



# AMX SUSTAINABILITY

Enabling a Better World

**2021**  
SUSTAINABILITY  
REPORT



# CONTENT

MESSAGE FROM THE CEO	3
ENABLING A BETTER WORLD	5
ENABLING A BETTER PLANET	12
ENABLING A BETTER SOCIETY	22
ENABLING A BETTER WORKPLACE	29
ENABLING A BETTER BUSINESS FRAMEWORK	43
APPENDIXES	61
A. MATERIALITY AND STAKEHOLDER ENGAGEMENT	62
B. RISK MANAGEMENT	68
C. CONTRIBUTIONS TO UNSDGS AND UNGC PRINCIPLES	75
D. ENVIRONMENTAL INDICATORS	79
E. LABOR INDICATORS	83
F. SOCIAL INDICATORS	89
G. CORPORATE GOVERNANCE INDICATORS	91
H. CONTROVERSIES AND FINES	97
I. CERTIFICATIONS	103
J. ASSOCIATIONS AND ORGANIZATIONS	107
K. SASB INDEX	111
L. CLIMATE RELATED DISCLOSURES	113
M. SLL INDICATORS	117
N. GRI INDEX	118
O. TAX TABLE	122
EXTERNAL VERIFICATION LETTER	127

# OUR APPROACH TO REPORTING

(102-1, 102-12, 102-46, 102-50, 102-51, 102-52, 102-54, 102-56)

This Annual Sustainability Report describes América Móvil’s performance and achievements regarding environmental impact, labor management, social development and corporate governance, during the period between January 1st and December 31st, 2021. Unless otherwise stated, we report consolidated information corresponding to the 24 countries where we operate, which we usually group by region. Please note that after the sale of TracFone Wireless, we removed the United States of America (USA) indicators from previous years to make data comparable.

Our Sustainability Reporting is based on our materiality assessment, our commitment to the 10 Principles of the Global Compact and the United Nations Sustainable Development Goals. Also, we incorporate several methodologies and indicators from the Global Reporting Initiative (GRI) under the Essential option, the Sustainability Accounting Standards for the Telecommunications Services Industry (SASB), as well as recommendations of the Task Force on Climate Related Financial Disclosures (TCFD), the World Economic Forum and information requests from funds and rating agencies.

**We believe that online reporting is the most practical and efficient way to communicate with a large number of our stakeholders. We developed an interactive executive report, (downloadable to pdf) focusing the content on the progress of the year, and where appropriate, we redirect the reader to further information published elsewhere online or in the appendixes of this document.**

To fulfill our commitment to share accurate and transparent information, Ernst & Young verified several of the indicators included in this report. To review the scope of the indicators subject to external verification and the report issued by Ernst & Young, see the External Verification Letter at the end of the document.



# MESSAGE FROM THE CEO

(102-14, 102-15)

At the beginning of 2021, new COVID waves led to renewed confinements, constrained mobility, and a slowdown in economic activity in some countries within our footprint, including our major markets. Notwithstanding, América Móvil, once again, was able to contribute and reinforce the relevance of our business in people's lives and in building a better world, ending the year on a high note.

As vaccination progressed, activity resumed; but by the end of the second quarter, signs of higher inflation had created uncertainty that drove price corrections in some segments of the financial markets. In several Latin American countries inflation exceeded expectations and pushed some central banks—notably in Brazil and Mexico—to begin to hike interest rates. Foreign exchange volatility increased throughout Latin America. Furthermore, during the third quarter supply shortages were prevalent in several industries at a global level, thus inflation data continued to surpass estimates in the U.S. and other countries, so we continued to experience volatility in interest rates, exchange rates and equity markets through the remainder of 2021.

On the one hand, we continued to experience high demand for connectivity services across all markets since the pandemic shifted to greater use of digital solutions and online services. On the other hand, our strict controls and cost contention efforts allowed for EBITDA expansion of 6.7%. Even with the uncertainty and complexity of the aforementioned factors, we strengthened our leadership position and promoted development in the region, supported by our solid financial profile, which enabled us to resume investments that enhanced the power of our networks, as well as by our outstanding customer experience, that continues to be a strategic competitive advantage for the Company.

In 2020, we communicated our intentions to streamline our portfolio to concentrate our efforts on the organic opportunity we foresee in several markets. In November 2021, we completed the sale of Tracfone to Verizon. We have also been working with the relevant authorities to obtain the permits to complete the

sale of our assets in Panama and proceed with the joint venture with Liberty in Chile, both transactions announced in 2021.

Also, during the year, we obtained the relevant authorizations, for the most part, in 15 countries in Latin America, to proceed with the spin-off of a portfolio of 31 thousand towers into a new entity, *Sitios Latinoamérica*, which we expect to conclude in the third quarter of 2022.

It is worth highlighting that this year, we issued our first credit facility with sustainability commitments, and we expect it to be the first of many. We see this as a means to better align our financial strategy with our sustainability performance, showing our stakeholders that we are committed and moving in the right direction.

We issued a US\$1.5 billion Euro-equivalent Sustainability Linked Senior Unsecured Revolving Credit Facility with a 5-year tenor. We selected three KPIs we deem to be material for the company. The first one relates to reducing absolute scope 1 and 2 greenhouse gas emissions following our science-based targets and our net zero commitment. The second commitment touches on one of our most valuable assets -our employees- and; it is linked to health and safety standards. We are committed to increasing the number of subsidiaries with ISO 45001 certifications. Lastly, to improve our Board Governance, our third KPI must include two female members on our Board of Directors. Today, I can announce that we are well on track with the first two commitments and that we fulfilled the third one in 2021.

Sustainability is of the utmost importance for the Company; therefore, I chair the efforts of the Sustainability Committee, which is now comprised by Chief Executives

of América Móvil. The support from our executives has been fundamental in accelerating the engagement of the rest of the organization towards sustainability best practices that will help us achieve our goals. This year we made good progress in our sustainability agenda; for example, we managed to reduce CO<sub>2</sub>e emissions by 16% across our scope 1 and 2 footprint. Additionally, we reviewed our Company Purpose and Sustainability Strategy in light of our recent materiality assessment and the establishment of a new set of long-term goals that we will be striving.

As telecom operators, we are aware of the great responsibility we have to bridge the digital divide, support digital skills to become more prevalent among the population, in addition to serve and reduce the environmental footprint that people and industries have on the planet. We are catalysts for economic and social development in the region. Connectivity enables local producers to sell their products online as large retail chains do, it reduces mobility and drives efficiencies that translate into less energy consumption and avoided greenhouse gas emissions. Also, it allows children in rural areas to receive the same kind of education other children receive in large cities. Connectivity also enables people to receive real-time information that has saved many lives and makes it possible for family and friends to remain close.

At year-end, we accomplished bringing Internet services to 520.4 million people through our LTE coverage: 10.3% more than in 2020. Additionally, we continue to modernize our networks to migrate from 2G and 3G to LTE. It is important to mention that this year, our coverage reached 65% of population in underserved communities with LTE services in the region.

We continue expanding and modernizing our networks with the launch of 5G in most of our markets in 2021, to improve customer experience with higher speeds and lower latency. This technology will also enable us to offer innovative solutions for residential and corporate customers.

We are committed to move forward with our climate change strategy, update our business continuity and risk management plans, strengthen our information security practices, improve our customer experience, develop a responsible value chain, and reinforce our zero-tolerance for corruption and human rights violations along with our compliance culture, all of which have led us to become the leading telecom operator in our region.

In short, we are committed to creating value for all shareholders and stakeholders by delivering the best services to almost 300 million people, 30 million households, more than 2 million small and medium-sized businesses and our region’s leading corporations. We are grateful for the valuable contribution of our employees and business partners for the achievement of our results, since they join forces with América Móvil to enable a better world.

**Daniel Hajj Aboumrad**  
Chief Executive Officer







# OUR MISSION

We provide the best services and customer experience through the most advanced communication, information technology, and digital content solutions to bring people closer, accelerate the development within the region, and promote equal opportunities among people.

# OUR VISION

Consolidate as agents of change by providing connectivity and services with state-of-the-art, while maintaining our leadership in the telecommunications industry and reinforcing our commitment to enable a better world.



# OUR VALUES

(102-16)



**CUSTOMER EXPERIENCE:** We are committed to strengthening the relationship with our customers, who are the core of our business by promoting, listening and understanding their needs to provide solutions that generate the best service experience and their full satisfaction.



**INNOVATION:** We promote an environment of challenge and flexibility to change, we encourage continuous dialogue and the collective construction of new ideas and solutions that allow us to be better, consciously taking risks and considering mistakes as an opportunity to learn.



**PEOPLE / HUMAN DEVELOPMENT:** We develop the potential and honor the dignity of people in a learning environment, where respect, collaboration, high performance, diversity, equality, and inclusion are essential. We promote people's growth through challenge, training, guidance, and empowerment in decision making.



**SUSTAINABILITY:** Our commitment is to be an agent of change that promotes inclusion, economic development, and well-being in the region by always seeking a balance between the economic, social, and environmental aspects of our operations. Therefore, we are determined to do what is best for our employees, customers, suppliers, shareholders, and other stakeholders.



**INTEGRITY:** We strictly comply with the laws, regulations and ethical principles that govern our activities. We believe that transparency and honesty create security and trust. We value consistency between what we say and what we do.



**EFFICIENCY:** Maintaining austerity in times of prosperity to maintain strength in times of crisis. We care for our Company's assets as if they were our own. We optimize our processes by controlling our costs and expenses, adhering to the highest quality standards in the industry.



**COLLABORATION:** We encourage everyone's participation to actively contribute to the achievement of our objectives by providing insights, as well as listening and valuing the ideas of others. We combine our talent, experience, and skills to achieve better results.





# OUR SUSTAINABILITY STRATEGY

## SUSTAINABILITY GOVERNANCE

(102-32)

Sustainability at América Móvil is supervised by the Board of Directors and is one of the highest priorities for the Company. Furthermore, our Sustainability Committee is led by our CEO and involves all the C-Suite. By incorporating sustainability into strategic decision making in our daily operations, we are confident that we can improve our operating and financial performance and maintain our leadership in the market.

This year, with the introduction of our first Sustainability Linked Loan (SLL) we move forward towards better aligning our financial strategy with our Employee, Environment, Social, and Governance (EESG) performance. It was a US\$1.5 Billion Euro-equivalent Sustainability Linked Senior Unsecured Revolving Credit Facility, with a 5-year tenor. We selected three KPIs, the first one relates to the reduction of absolute scope 1 and 2 greenhouse gas (GHG) emissions, which aligns with our science-based targets and net zero commitment. The second KPI touches on one of our most valuable assets, our employees, and is linked to health and safety standards. Also, we committed to increase the number of subsidiaries with ISO 45001 certifications. Our third KPI required for the inclusion of two female members in our Board of Directors. To date, we are well on track with the first two commitments and have fulfilled the third one in the first year of the facility.



FOR MORE DETAIL REGARDING OUR SUSTAINABILITY GOVERNANCE AND THE CORPORATE SUSTAINABILITY COMMITTEE PLEASE GO TO OUR SUSTAINABILITY SITE IN [AMERICAMOVIL.COM](https://www.americamovil.com)





MESSAGE FROM  
THE CEO



ENABLING A BETTER  
WORLD



ENABLING A BETTER  
PLANET



ENABLING A BETTER  
SOCIETY



ENABLING A BETTER  
WORKPLACE



ENABLING A BETTER  
BUSINESS FRAMEWORK



APPENDIXES



EXTERNAL  
VERIFICATION LETTER

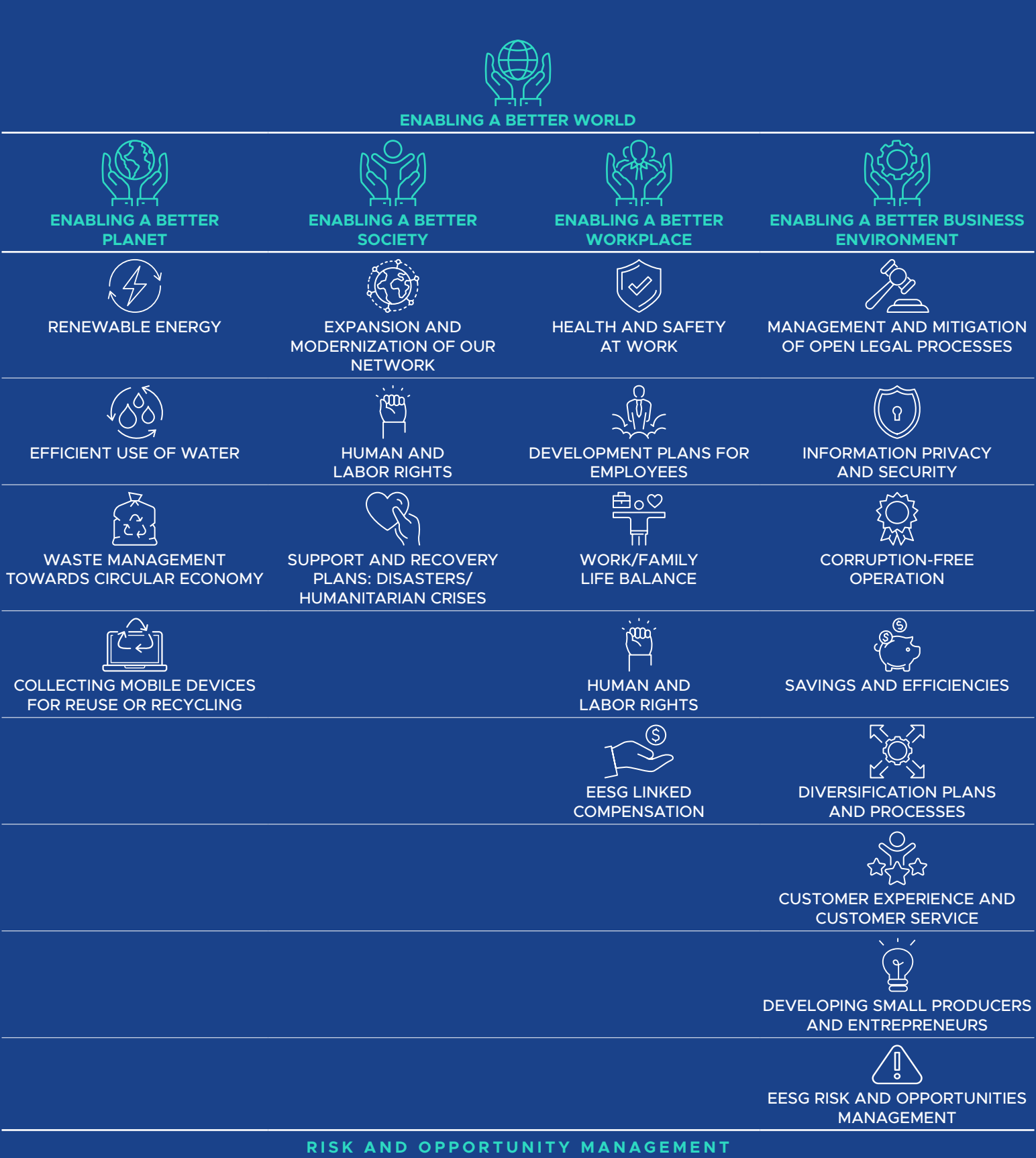
MATERIALITY

(102-21, 102-29, 102-31, 102-47)

At year-end 2021, we updated our materiality assessment through more than 34 thousand surveys among our different stakeholders (employees, directors, investors, board members, customers, corporate clients, retailers, suppliers, press, non-government organizations, academy, business associations, and authorities) in 18 countries of the Americas and Europe; and an impact assessment workshop held with the participation of key América Móvil’s management teams.

The following are the 20 most material EESG issues that resulted from the materiality surveys and the impact assessment workshop held with our top management, which will enhance the four pillars of our strategy.

After COVID-19 many of the priorities of our stakeholders have shifted. We have identified more awareness on health and environmental topics. The post-pandemic economy relies heavily on digital services and connectivity, thus Internet access and network reliability become fundamental for economic development and recovery. The labor market has also changed since flexible schemes, labor rights and evaluating performance are more relevant than ever. However, focusing on business ethics, human rights, privacy, cybersecurity, and innovation within the Company along with our value chain remain as important as before to provide the best customer experience.



FOR MORE DETAIL REGARDING THE IMPACTS AND STRATEGY DERIVED FROM OUR MATERIALITY ASSESSMENT, PLEASE GO TO [APPENDIX A](#) OF THIS DOCUMENT.







## SUSTAINABILITY STRATEGY

This year, we updated our Sustainability Strategy to ensure alignment with our Company Purpose and the recent materiality analysis. This exercise led us to include new priority issues for our stakeholders, the establishment of the second round of long-term targets to address such issues, and the implementation of corporate initiatives throughout all our operations, contributing to economic, social, and cultural development in the region.


Our service is fundamental for our customers' well-being: personal, family, and professional lives. Through our connectivity and solutions, we contribute to reduce the digital divide, improve access to education and health, and generate more significant social inclusion and development opportunities. We team up with our more than 180 thousand employees and join forces with business partners and organizations to work together to benefit the environment, biodiversity, culture, and communities to achieve our goal of enabling a better world.




ENABLING A BETTER WORLD




ENABLING A BETTER  
PLANET



ENABLING A BETTER  
SOCIETY



ENABLING A BETTER  
WORKPLACE



ENABLING A BETTER  
BUSINESS ENVIRONMENT

We minimize our environmental footprint while contributing to avoiding our clients' GHG emissions through connectivity services and digital solutions.

- Climate Change Strategy
- Energy Management
- Waste Management
- Water Management
- Operational Efficiency
- Biodiversity Programs

Through connectivity, we promote economic development and inclusion, contributing to fight poverty and generate greater opportunities in the region.

- Human Rights
- Internet Access
- Digital Divide
- Digital Skills and Digital Education Platforms
- Responsible use of the Internet
- Emergency response
- Social Investment

Our customer experience and business success relies on attracting, developing and retaining the best talent. Therefore, we foster growth within a favorable work environment.

- Labor Rights
- Diversity and Equality
- Talent Attraction and Retention
- Human Capital Development
- Health and Safety
- Employee Well-being
- Compensation
- Employee Engagement

Ethics and integrity govern our daily actions, in the operation and with our value chain, to acknowledge the trust that our stakeholders have placed in us.

- Customer Experience
- Innovation
- Network Reliability
- Ethics and Compliance
- Information Privacy and Security
- Privacy in Communications
- Value Chain Management
- Risk Management



# OUR TARGETS

Under these pillars, we have defined a series of targets that help us measure progress through our shared value strategy.

## BETTER SOCIETY

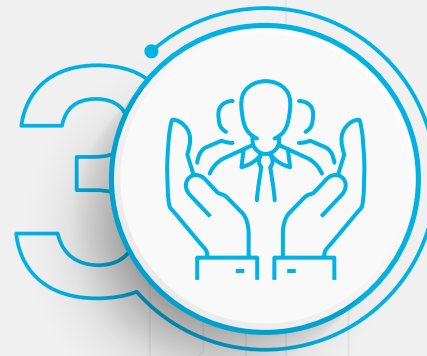
As agents of change and catalysts for development, we must ensure that we maximize the benefits that connectivity can offer to the community.

- Zero tolerance for human rights violations in our operations and our supply chain.
- Increase training in basic digital skills that allow users to communicate and access public, commercial, and financial services online.
- Increase training in digital skills to improve the employability of people in different sectors, promoting entrepreneurship and the growth of small businesses.
  - Increase training on technical digital professions and higher-level skills.
  - Increase training in digital skills and online safety for children and teenagers.

## BETTER BUSINESS FRAMEWORK

We conduct business based on strong principles and values, which has resulted in the excellent reputation we have with society and our stakeholders'.

- Zero tolerance for corrupt practices within the Company and in the supply chain.
  - 100% of our active business partners evaluated in 2025.
  - 100% of our subsidiaries certified to ISO27001 by 2025.
- 100% of our active business partners trained in our Code of Ethics and Anti-corruption practices, and at least 50% trained in environmental footprint by 2025.
- Consistent increase in Net Promoter Score compared with previous years and exceeding competition in all brands and segments.
- Increase to 3 female directors in the Board of Directors of América Móvil by 2025\*.



## BETTER PLANET

We have great potential to reduce the environmental impact of our customers and users through the connectivity and solutions we offer them. Additionally, we ensure that while providing our services, we carry them out with the lowest possible environmental impact.

- Net zero by 2050.
- 52% reduction of our carbon emissions from energy and fuel consumption towards 2030 (scope 1 and 2)\*.
- 14% reduction of carbon emissions generated by the goods and services we purchase from our suppliers by 2030 (scope 3).

## BETTER WORKPLACE

Our employees are our most valuable asset. Human capital is an important driver of our performance; therefore, we strive to provide the best work environment.

- Zero fatalities (employees and contractors).
- 25 of our subsidiaries with health and safety certifications (ISO 45001) by 2025\*.
- 100% of our senior managers evaluated in 360° evaluations<sup>1</sup> every 3 years.
- Performance evaluations in 98% of our workforce by 2030.
- 1% improvement in the result of the employee climate survey plus a participation rate over 90% year on year.

\* Targets linked to America Móvil's SLL.

<sup>1</sup> Evaluation system in which the employee's performance is formally evaluated not just by their direct line manager, but also by peers, direct reports, and other employees, providing a "360 degree" view of the employee's performance.



# GLOBAL COMMITMENTS AND INDEXES

(102-12)

As part of our long-term sustainability strategy, we established relationships with several associations and organizations that contribute to our sustainability goals.

We ratify our commitment to strategic global initiatives, such as:

- United Nations Sustainable Development Goals
- Principles of the United Nations Global Compact
- UN Women Empowerment Principles
- United Nations Business Ambition for 1.5 ° C
- The GSMA Climate Action Task Force
- The GSMA Sustainability Working Group
- The GSMA We Care Program



TO LEARN MORE ABOUT OUR MEMBERSHIP TO ASSOCIATIONS AND ORGANIZATIONS GO TO [APPENDIX J](#).

**WE ARE PROUD TO ANNOUNCE THAT  
ONCE AGAIN, THIS YEAR WE WERE  
INCLUDED IN THE DJSI MILA PACIFIC  
ALLIANCE, THE S&P/BMV TOTAL ESG  
MEXICO INDEX, AS WELL AS IN THE  
FTSE4GOOD INDEX.**





# ENABLING A BETTER PLANET

(102-18, 102-20)



We deliver connectivity, Information Technology and Internet of things solutions, using artificial intelligence, and cloud-based systems; they contribute to decarbonization in other industries as well as in our customers' carbon footprint.

At América Móvil we have reinforced our commitment to operate with the least possible impact on the environment, consistent with our purpose of enabling a better world, while substantially reducing carbon emissions in other industries, as well as support our users to reduce their environmental footprint through connectivity and digital solutions.



As part of this efforts, in 2019, we announced our science-based target (SBT) to reduce our absolute direct (scope 1 and 2) GHG emissions by 52%, as well as our absolute scope 3 GHG emissions by 14% by 2030 (compared with 2019 levels); and committed to become net zero by 2050.

Also, as part of our Sustainability Linked Loan, last year we committed to a mid-term reduction target of 19% of scope 1 and scope 2 emissions by 2025 (vs. 2019 levels), which we will accomplish through five annual reduction targets.

In order to accomplish such commitments, at América Móvil we are focusing our efforts on two main strategies: First, minimizing the environmental footprint of our operations, products, and services throughout the entire life cycle, and second, compensating our environmental externalities so that the Company's footprint reaches closer to zero.

In 2019, we created an Emissions and Energy Task Force, led by the Chief Wireless Operations Officer (COO) to develop, and implement the Company's decarbonization strategy, along with sharing experiences, challenges, and best practices across different operations. Since then, our COO actively participates in the Corporate Sustainability Committee, through which we report progress on our Climate Change Strategy to Top Management and the Board of Directors.

Our governance model includes:

- A technical team in charge of energy efficiencies and other responsibilities related to our scope 1 and 2 emissions;
- a multidisciplinary team who must lead all clean/renewable energy procurement and scope 3 reduction initiatives; and,
- a steering team that supervises the progress made by the other teams' initiatives and is responsible for managing and reporting the Company's emissions.

Our decarbonization strategy focuses on 4 pillars:

1. to foster the use of renewable energy or migrate to cleaner energy sources as far as possible;
2. to modernize equipment to incorporate more efficient technology in technical and environmental terms;
3. to work with the value chain to reduce emissions related to the production and transportation of goods and services that are used in the operation; and,
4. to encourage the development of sustainable energy projects through the purchase of clean and renewable energy attribution certificates.

Additionally, we are in close collaboration with the industry as part of the GSMA Climate Action Task Force for:

- Aligning common partners in the value chain towards reporting emissions and committing to adopt reduction targets;
- improving the environmental sustainability of mobile devices and equipment;
- agreeing on climate policy frameworks and advocacy engagement to gain support from governments and other stakeholders for a fair and equitable net zero transition;
- adapting infrastructure and managing extreme weather events;
- increasing access to and use of renewable energies; and,
- using mobile connectivity to reduce carbon emissions through smart technologies.

In addition, since the validation of our SBT was one of the most ambitious targets in our region, we have worked closely on advocacy efforts and community practices with organizations such as UN Global Compact, CDP, WWF, WRI, among others, to encourage and guide other companies within the region to promote similar commitments.



IN 2021, DURING "SUSTAINABILITY WEEK"  
WE PROVIDED TRAINING ON OUR CLIMATE  
CHANGE STRATEGY TO MORE THAN

250

EMPLOYEES FROM THE SUSTAINABILITY  
AND OPERATING AREAS,  
AS WELL AS THOSE RESPONSIBLE FOR  
ENVIRONMENTAL AND ENERGY MANAGEMENT  
INCLUDING MANAGERS AND DEPUTY DIRECTORS  
OF ALL OUR SUBSIDIARIES.

To accelerate the progress to meet our target, we have established GHG emission reporting guidelines relevant to our reduction strategies and adopted an IT platform to improve the quality of emissions reporting and reduce human error.



SINCE 2017, AMÉRICA MÓVIL  
HAS IMPLEMENTED

371

NETWORK AND ENERGY EFFICIENCY  
PROJECTS ACCOUNTING FOR  
240 MILLION DOLLARS' WORTH OF  
ENERGY REDUCTIONS.





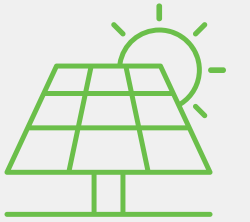
## ENERGY

(302-1, 302-4)

The Company and our subsidiaries carry out several specific efficiency and reduction initiatives considering the needs of each operation. However, we are implementing some quick measures across all operations like the set point of 27°C in all our network air conditioning equipment and replacing them with more modern and efficient ones.

This year, our overall energy consumption was 6.4 million megawatt hours (MWh), 21% of which came from renewable energy, 64% from the grid and 16% from combined cycles.

In 2016, Claro Brazil implemented clean energy purchase agreements and developed self-generation electricity plants. These projects allowed that in 2021, 49% of its electricity consumption did not generate any type of pollutant emissions. Currently, Claro Brazil has 64% self-generation electric units (52% photovoltaic, 6% hydroelectric, 2% biogas and 4% qualified cogeneration) which comprise more than 500 thousand solar panels and supply energy for up to 65% of the consumption of mobile sites. We expect to replicate the valuable experience of Claro Brazil in other subsidiaries.



**ONE OF OUR PRIORITIES IS TO USE MORE ENERGY FROM RENEWABLE SOURCES, MAINLY WIND AND SOLAR IN ALL MARKETS WHERE POSSIBLE.**

DURING 2021,

**46%**

**OF OUR SUBSIDIARIES ENTERED INTO POWER PURCHASE AGREEMENTS OR PURCHASED GREEN ELECTRICITY.**



**SINCE 2014, OUR SUBSIDIARY IN AUSTRIA OPERATES THE NETWORK WITH**

**100%**

**RENEWABLE ENERGY.**

**THE A1 GROUP OPERATES ITS OWN TWO LARGE PHOTOVOLTAIC FARMS. ONE IN BELARUS WHICH PRODUCES AROUND 24 MILLION KWH PER YEAR SINCE 2014, AND ONE IN AUSTRIA, WHICH PRODUCES MORE THAN 250 THOUSAND KWH OF ELECTRICITY PER YEAR SINCE 2013.**



# FUEL CONSUMPTION

(302-1)

We use different fuels to supply our fleet of cars and power plants to enable our base stations to provide connectivity to consumers in remote areas without access to electricity.

We started renewing our vehicles fleet across operations to achieve greater efficiency and less pollution. Regarding our off-grid base stations, we are replacing onsite diesel power plants for hybrid solar based systems along with maximizing the use of batteries. This has allowed us to reduce 11% our overall consumption of diesel and 56% bioethanol compared with 2020.

# WASTE

(306-2, 306-4, 306-5)

**AMÉRICA MÓVIL PROMOTES CIRCULAR ECONOMY FOR NETWORK EQUIPMENT BY DEVELOPING SOME STRATEGIES IN ORDER TO ACHIEVE A BETTER AND RESPONSIBLE END OF LIFE TREATMENT OF REUSED, RESOLD, REMANUFACTURED, OR RECYCLED EQUIPMENT OF OUR NETWORK.**

**NON-RECYCLABLE MATERIALS WILL BE SECURELY DISPOSED.**

Whenever possible, we seek to repair and reuse electronics, both in our network equipment and in computer and information technology hardware, as well as modems, decoders and other devices provided to customers. Once these are obsolete or no longer functional, they are transferred to certified suppliers for recycling. Additionally, in many of our subsidiaries we have collection programs for mobile phones and other electronic devices to promote awareness and develop a recycling culture in the community.



IN 2021, WE REUSED

**133**

**TONS AND RECYCLED MORE THAN 8.4 THOUSAND TONS OF ELECTRONIC WASTE THROUGH DIFFERENT SUPPLIERS.**

**IN ADDITION, WE CONTINUE TO PROGRESSIVELY REDUCE THE AMOUNT OF WASTE DISPOSED INTO THE LANDFILL.**



# WATER

(303-5)

Even though water is not a material input for our operation, we acknowledge its importance for Climate Change. Therefore, we are committed to improve water efficiency and reduce our water use year on year. At América Móvil, we use water mainly for human consumption, but in some cases, we also use it for data center cooling systems where we use high-efficiency closed-cycle systems.

In 2021, América Móvil consumed 3.9 million cubic meters of water.

All the Company's water discharges complied with the regulations of the regions where we operate.



WATER CONSUMPTION	TOTAL (M³)
2018	4.5
2019	3.06
2020	2.30
<b>2021</b>	<b>3.9</b>

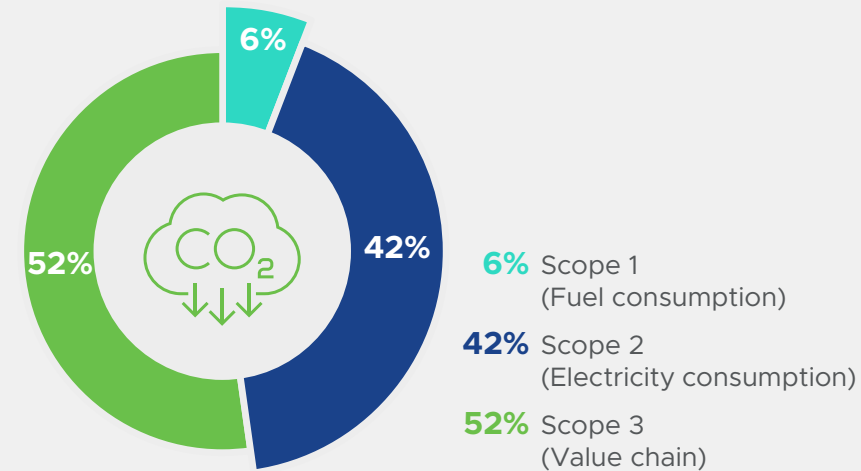
*\*The increase in water consumption in 2021 relates mainly to the inclusion of Telcel and Puerto Rico in this years' scope. Without Telcel and Puerto Rico our 2021 consumption was 3.0 m³.*



# EMISSIONS

(305-1, 305-2, 305-3)

During 2021, our greenhouse gas (GHG) emissions totaled 5,243,509 tons of CO<sub>2</sub>e (market based), of which more than 299 thousand tons of CO<sub>2</sub>e correspond to emissions of scope 1, 2.1 million tons of CO<sub>2</sub>e from emissions of scope 2, and 2.6 million tons of CO<sub>2</sub>e of scope 3.



We are decreasing the use of refrigerant gases and substituting those for lower environmental impact alternatives as part of the annual maintenance plans.

In 2021 Claro Brazil developed a project we call “Power Saving RAN functions” which allowed us to save energy in base stations when the traffic is too low by switching off some functionalities that enable less electricity consumption without compromising network quality. The project was successfully implemented and has been shared with all our subsidiaries to be part of our 2022 reduction emissions plan.

## CARBON INTENSITY

(305-4)

For the past 3 years, we have been successfully reducing our scope 1 and scope 2 carbon intensity per terabyte streamed in our network, achieving a 24% reduction this year.

### CARBON EMISSIONS BY TERABYTE STREAMED ON THE NETWORK

	TBs <sup>1</sup>	TON CO <sub>2</sub> e (scope 1 and 2)/TBs
2019	5,797,075	1.46
2020	8,667,661	1.06
<b>2021</b>	<b>9,867,329</b>	<b>0.53</b>

<sup>1</sup> Terabyte streamed

## CONNECTIVITY FOR A BETTER FUTURE: “THE ENABLEMENT EFFECT”

The use of technology is key to generate efficiencies in many industries and to promote decarbonization. We have been developing solutions for corporate customers that could result in substantial GHG reductions, among other benefits. Additionally, we have seen an increased usage of connectivity solutions in the residential segment, including productivity solutions, online education, online banking, entertainment, which ultimately results in an overall reduction of the environmental footprint.





# BIODIVERSITY

(304-2, 304-3)

In accordance with our strategy, we seek to generate a positive impact in the environment by integrating mobile technologies in the protection of species. In order to achieve this, we have established alliances with local governments and associations whose objectives are aligned with ours.



WE HAVE DESIGNATED MORE THAN

## \$870

THOUSAND DOLLARS PER YEAR  
FOR THE DIFFERENT BIODIVERSITY AND  
CONSERVATION PROGRAMS CARRIED  
OUT BY THE WWF-TELMEX TELCEL  
FOUNDATION ALLIANCE (*ALIANZA WWF-  
FUNDACIÓN TELMEX*)

RESULTING IN EXTENSIVE SOCIAL AND  
ENVIRONMENTAL BENEFITS, THE GENERATION  
OF NEW EMPLOYMENT OPPORTUNITIES,  
ENVIRONMENTAL EDUCATION, ECOTOURISM,  
REFORESTATION, AND COMMUNITY COOPERATION,  
AMONG OTHERS.



Alianza  
FUNDACIÓN  
**TELMEX telcel**



## CONSERVATION PROGRAM FOR THE MONARCH BUTTERFLY

Since 2003, the WWF-Telmex Telcel Foundation Alliance has implemented a Conservation Program for the Monarch Butterfly (*Programa para la Conservación de la Mariposa Monarca*) whose objective is to preserve this species in Mexico, as well as its habitat (The Monarch Butterfly Biosphere Reserve in the states of Michoacán and Estado de México), including its migration and hibernation. The program has been successful in eradicating illegal logging, creating sustainable community businesses, protecting, and restoring forests, developing an economic strategy that provides communities with alternative business opportunities linked to forest conservation, and the publication of scientific articles considered as the technical basis for the management of the Reserve.

The main achievements of the program include:

- The establishment of five spaces for the sustainable transformation of wood, whose felling capacity is 4,500 cubic meters. These elements produce 9 million pesos for the agricultural communities that own them. We also supported three community processing centers' chain of custody certification under the Forest Stewardship Council (FSC) standards.

- Supported the growth of more than 18 million plants in 13 community forest nurseries established and preserved by WWF and our national and international partners), historically exceeding the biannual goal of 1 million trees.
- Continued support for the reforestation program of the Forest Protection (*Protectora de Bosque - PROBOSQUE*), by planting 1 million saplings in 1,893 acres (766 ha) in coordination with PROBOSQUE, WWF Canada, Air Wick, two municipalities, and a civil society organization. To date, we have achieved reforestation of 47,049 acres (19,040 ha) by planting 19 million trees. In addition, we supported 15 community brigades to protect close to 964 thousand acres (390,114 ha) of temperate forests, grasslands and jungles in the Estado de Mexico and Michoacán.
- Established a network of 32 mushroom production modules, a processing module, and the provision of 32,147 bags of inoculated substrate, which generated benefits of \$3.9 million pesos for production families.



Alianza  
FUNDACIÓN  
**TELMEX telcel**



**DURING 2021 WE DID NOT CARRY OUT A REFORESTATION DAY WITH EMPLOYEES DUE TO THE PANDEMIC, BUT WE DID FULFILL THE REFORESTATION IN THE FORESTS WITH THE LANDLORDS<sup>1</sup>, IN ADDITION, WE HELD A VIRTUAL REFORESTATION WHERE FOR EACH TREE PLANTED, THE ALLIANCE PLANTED**

**200  
REAL TREES.**

<sup>1</sup> Land lord/ Ejidatario is the member of the ejido (land) that receives a parcel of land to produce and all decisions pertaining to the ejidal land must be made by the entire assembly of the ejidatarios.





## JAGUAR PROTECTION PROGRAM

We have carried out the Program for the Protection of Jaguars (*Programa de Protección a Jaguares*) for 16 years in association with the National Alliance for the Conservation of Jaguars (*Alianza para la Conservación de Jaguares*) and the WWF-Telmex Telcel Foundation Alliance. The objective of the program is to promote, care for, and preserve the species and its habitat with projects that contribute to environmental policies and establish a link between the different sectors of society to ensure the preservation of jaguars, their prey, and their habitats in Mexico.

The main achievements of the year were:

- Continuous monitoring of jaguars with satellite telemetry collars has been a fundamental tool for jaguar conservation in the Calakmul region, home to the largest population of the species in Mexico. Our results from 2020 to 2022, indicate that none of the tagged animals have been hunted. On the other hand, the camera-trap monitoring data (complementary to the telemetry collars) shows that, in the last 10 years, the jaguar population in our study site has almost doubled, and from 2020 to 2022 it has remained stable. Our data have provided a baseline to compare with other jaguars in the same region over time, or with other jaguars in southeastern Mexico.

- The identification of biological corridors is essential to determine which sites are priorities for maintaining the connectivity of jaguar populations in regions where natural environments have been fragmented. In 2021 we completed the identification of all biological corridors in the Yucatan Peninsula by finishing the mapping of the biological corridors of Calakmul-Sierrita de Ticul-Los Petenes and Calakmul - Sian Ka'an. Biological corridors and natural protected areas are the main mechanism for the conservation of ecosystems and wildlife.

- The National Jaguar Symposium was held on 6-9 December 2021 in Cuernavaca, Morelos. More than 40 specialists participated and worked on the new version of the National Jaguar Strategy. Three scientific articles were published on the ecology and conservation of the jaguar in Mexico: CEBALLOS, G., et al. (2021). "Jaguar Distribution, Biological Corridors, and Protected Areas in Mexico: from Science to Public Policies"; CRUZ, C., H. Zarza, J. Vidal-Mateo, V. Urios and G. Ceballos (2021). "Top Predator Ecology and Conservation: Lessons from Jaguars in Southern Mexico"; CEBALLOS G., H. Zarza, et al. (2021). "Beyond Words: From Jaguar Population Trends to Conservation and Public Policy in Mexico".



## CONSERVATION OF MARINE SPECIES IN THE SEA OF CORTEZ

In 2021 we celebrated the Thirteenth Anniversary of the Species Conservation of Priority Marine Species in the Sea of Cortez (*Programa de Conservación de Especies Marinas Prioritarias en el Mar de Cortés*). This program, in which we collaborate with the WWF - Fundación Telmex Telcel Alliance, is the only one in the Gulf of California that focuses on 15 marine species that are in danger of extinction, divided into three large groups: whales, sea turtles and sharks.

Among the most relevant achievements of the year are:

- In the 2021 - 2022 season, nest protection increased by 30% compared with last season, with 30,010 eggs and 14,708 olive ridley sea turtle hatchlings released compared with the previous season.
- In collaboration with Ecology and Whale Conservation (*Ecología y Conservación de Ballenas - ECOBAC*) and the Laboratory of Marine Mammalogy of the UNAM, we made progress in addressing the threats of collisions, entanglement, and bad tourism practices by identifying risk areas throughout the Mexican Pacific. The above was achieved by analyzing marine traffic (AIS data) and distribution of 18 whale species. Training and communication materials were provided by the Alliance and participating organizations in response to the importance of addressing and better understanding this threat and the international collaboration.
- Ten acoustic tracking stations were installed to determine important white shark distribution areas and migration routes in five islands off the west coast of Baja California and the Gulf of California, which have not been studied before.
- The “Manual of Good Practices for Observing White Sharks Through Cage Diving in the Guadalupe Island BC” was updated. With the participation of 65 specialists, the manual intends to prevent incorrect attraction practices, cage design, and accidents that may harm people and sharks.







THIS YEAR,

**17,122**

**STUDENTS FROM 105 SCHOOLS WERE  
VISITED IN 31 STATES,  
279 TEACHERS WERE INVOLVED IN THE PROGRAM  
AND GAVE 198 LECTURES.**

## NATURE IN YOUR SCHOOL AND AT HOME PROGRAM

This program has operated successfully since 2014 through the WWF and TELMEX-TELCEL Foundation Partnership to create awareness among Mexican students regarding the need to protect vulnerable species and their habitats.

During 2021, the Project was carried out virtually, and participation was through social networks and uploading their projects on our official website (lanaturalezanosllama.com), each month there was an invitation to participate in the project for a different species where schools were visited for two weeks virtually, the species were:

- Gray Whale
- Mexican Wolf
- Blue Whale
- Hammerhead Shark
- Red Macaw
- Pink Snail
- Leatherback Turtle
- Virtual Reforestation Journey
- Bull Shark
- Sea Lion
- Hawksbill Turtle



Alianza  
FUNDACIÓN  
**TELMEX telcel**



FOR MORE INFORMATION ABOUT OUR BIODIVERSITY PRINCIPLES VISIT OUR [ENVIRONMENTAL POLICY HERE.](#)



Today, more than ever, our priority is to accelerate digital inclusion. Therefore, we focused our strategy on three pillars: 1) bringing **Internet access** to underserved communities; 2) **promoting its adoption** in the most vulnerable groups of society (we seek to include women, people with disabilities, the elderly, the poor, migrants, and rural population); and 3) helping these groups to **capitalize on all the benefits** of connectivity by offering **digital skills** and **digital education** to enhance their development.



# INTERNET ACCESS

The Company continues to make significant investments to expand the capacity and coverage of our networks to meet the needs of society in each country. The following table shows the percentage of the population covered by the Company as of December 31st, 2021:

## TECHNOLOGICAL EVOLUTION<sup>1</sup>

GENERATION TECHNOLOGY	GSM	UMTS	LTE
(% of covered population)			
Argentina	99%	98%	97%
Austria	100%	96%	99%
Belarus	100%	100%	0%
Brazil	94%	95%	87%
Bulgaria	100%	100%	99%
Chile	97%	97%	98%
Colombia	91%	80%	73%
Costa Rica	85%	86%	96%
Croatia	99%	99%	99%
Dominican Republic	100%	99%	97%
Ecuador	96%	80%	78%
El Salvador	91%	88%	87%
Guatemala	89%	89%	88%
Honduras	81%	82%	72%
Macedonia	100%	100%	99%
Mexico	94%	95%	93%
Nicaragua	72%	72%	50%
Panama	82%	90%	86%
Paraguay	77%	80%	83%
Peru	88%	83%	83%
Puerto Rico	82%	94%	99%
Serbia	99%	98%	98%
Slovenia	100%	100%	99%
Uruguay	100%	99%	98%



## INCREASE OF POPULATION COVERED AT YEAR-END 2021

At year-end, we accomplished bringing Internet access to 520.4 million people through our LTE coverage, 10.3 million more than in 2020.

We still have the opportunity to connect 79.8 million people with LTE in the region, 14.7 million of them living in underserved communities. We continue modernizing our networks in underserved communities to migrate from 2G/3G to LTE. This year we have reached 65% of people living in underserved communities.

Technology	Population Covered (Million)	Population Covered in Underserved Communities* (Millions)
UMTS (3G)	555.5	-
LTE (4G/4.5G)	520.4	39.4
5G	52.5	-

*\*We defined underserved communities as people living in communities under 5 thousand inhabitants.*

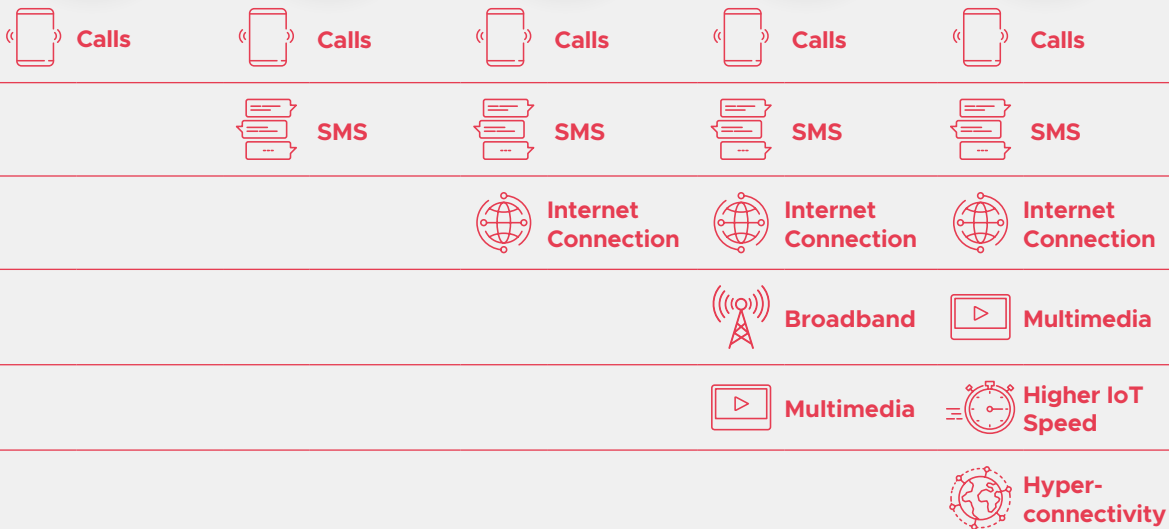
 **TO LEARN MORE ABOUT THE RELIABILITY AND AVAILABILITY OF OUR NETWORKS, [CLICK HERE](#).**

We continued to modernize our networks across all markets. In 2021, we further expanded our 5G networks in Austria and other eastern European countries and launched our 5G network in the Dominican Republic. In 2022, we will continue with the rollout of 5G networks in several markets in Latin America.

<sup>1</sup> As of December 31, 2021, our 5G network covered the following percentages of population in the indicated countries: 62% in Austria, 17% in Brazil, 52% in Bulgaria, 13% in Croatia, 6% in Dominican Republic, 18% in Peru, 49% in Puerto Rico and 19% in Serbia.



1G 2G 3G 4G 5G



Among the many advantages that our 5G Networks will offer, three main factors will change the way our users are connected:



**1. Higher speed and lower latency.** The 5G Network will be much faster, and the time it takes to transfer data will be materially reduced.



**2. Hyperconnectivity.** Our infrastructure will also allow more devices to be connected at the same time. For example, in public spaces with large crowds, such as concerts or public roads.



**3. Experience for entertainment.** The 5G network will allow unparalleled experiences with access to the extended reality immersion, including virtual, augmented, and mixed reality, along with extraordinary experiences for the gaming community.

# INTERNET ADOPTION

As of December 31st, 2021, América Móvil had 367 million accesses, 80 million revenue-generating units (RGUs<sup>1</sup>), and 287 million mobile subscribers (voice and data), 20 million more than the previous year.

MILLION ACCESSES	MOBILE	FIXED LINES, BROADBAND AND PAY TV
2017	279	83
2018	276	84
2019	278	81
2020 <sup>2</sup>	267	81
2021	287	80

**144,299**

PEOPLE DIRECTLY BENEFITED FROM  
DIGITAL ADOPTION PROGRAMS  
IMPLEMENTED BY OUR SUBSIDIARIES  
DURING THE YEAR.

<sup>1</sup> RGUs for fixed services comprise the number of fixed accounts for voice, data, and Pay TV services (which include the number of services of both types of Pay TV and certain other digital services).  
<sup>2</sup> Figure does not include TracFone.





**141.6** MILLION PEOPLE  
ACCESS SOCIAL NETWORKS  
92% LATIN AMERICA / 8% EUROPE



**19.8** MILLION PEOPLE  
USE AGRICULTURAL SERVICES  
88% LATIN AMERICA / 12% EUROPE



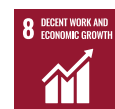
**46** MILLION PEOPLE  
USE MOBILE FINANCIAL SERVICES  
81% LATIN AMERICA / 19% EUROPE



**46.4** MILLION PEOPLE  
PAY FOR THEIR UTILITIES ONLINE  
84% LATIN AMERICA / 16% EUROPE



**49.6** MILLION PEOPLE  
ACCESS GOVERNMENT SERVICES  
91% LATIN AMERICA / 9% EUROPE



**52.7** MILLION PEOPLE  
SEARCH OR APPLY FOR A BETTER JOB  
85% LATIN AMERICA / 15% EUROPE



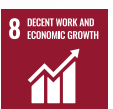
**54.2** MILLION PEOPLE  
MONITOR AND IMPROVE THEIR HEALTH  
86% LATIN AMERICA / 14% EUROPE



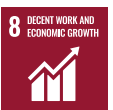
**131.3** MILLION PEOPLE  
MAKE VIDEO CALLS  
92% LATIN AMERICA / 8% EUROPE



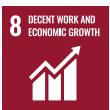
**122.1** MILLION PEOPLE  
ACCESS NEWS  
91% LATIN AMERICA / 9% EUROPE



**115.1** MILLION PEOPLE  
ACCESS FREE VIDEOS  
92% LATIN AMERICA / 8% EUROPE



**100.2** MILLION PEOPLE  
IMPROVE THEIR EDUCATION  
94% LATIN AMERICA / 6% EUROPE



**82.6** MILLION PEOPLE  
ACCESS INFORMATION  
ABOUT PRODUCTS AND SERVICES  
87% LATIN AMERICA / 13% EUROPE



**60.2** MILLION PEOPLE  
MAKE PURCHASES ONLINE  
84% LATIN AMERICA / 16% EUROPE



## USE OF INTERNET: IMPACT OF AMERICA MOVIL'S CONNECTIVITY<sup>1</sup>

(203-2)

The connectivity that América Móvil provides in Latin America and Europe enables us to be catalysts of progress for the SDGs achievement, accounting for:

<sup>1</sup> Source: Data obtained from GSMA Intelligence Consumer Survey (2020) and América Móvil calculations. The number of users is quantified by multiplying unique mobile subscribers by the percentage of respondents who said yes to performing a particular activity using a cell phone. Unique subscriber data is obtained from GSMA Intelligence, which combines data reported by mobile operators with GSMA Intelligence Consumer Survey and América Móvil. Total América Móvil individual users in Europe and Latin America totaled 208.9 million in 2021.





# DIGITAL SKILLS AND DIGITAL EDUCATION

We are committed to transforming the lives of as many people as possible, bringing digital tools to those who already have access to the Internet (regardless of their age, gender, geographic location, socioeconomic level, or academic history), to effectively eliminate barriers to access quality educational content, training, and health around the world.

## APRENDE (LEARN)

We are confident that, through education, we can promote development in the communities where we operate. Therefore, in partnership with Carlos Slim Foundation, we offer Aprende.org, an open and accessible free-of-charge platform that brings together modern and world-class content on training, employment, education, culture, and health. We offer free browsing on the platform through our networks in Mexico, Panama, and the Dominican Republic.

 **4,300,581**  
REGISTERED USERS

## EDUCACIÓN INICIAL (INITIAL EDUCATION)

The *Educación Inicial* Program (Initial Education) strengthens the skills of adults who are responsible for the upbringing and education of children through guidance, training, and support to significantly transform their vision and action towards them and therefore, enhance their affective, physical, cognitive, and social skills by using a human rights approach.

 **3,023,842**  
PEOPLE HAVE BEEN BENEFITED BY THIS PROGRAM



## PRUÉBAT (SELF-TEST)

This program provides the minimum education for the 21st century and develops language, math, digital, scientific, and technological skills. It offers students, teachers, and parents academic support with access to digital simulators with interactive content and assessments for intermediate and higher education grades.

**5,893,736**  
STUDENTS

**600,029**  
TEACHERS

**47,953**  
REGISTERED SCHOOLS

## KHAN ACADEMY IN SPANISH

This online platform offers practice exercises, instructional videos, and a personalized learning board in Math, Science, Finance, Economics, and Computer Science. This platform was created in 2006 by Salman Khan, and today it is used in several educational spaces around the world.

**18,692,630**  
STUDENTS

**6,896**  
VIDEO LECTURES

## CAPACÍTATE PARA EL EMPLEO (JOB TRAINING)

We created this initiative to develop productive skills in the region, through free online training for all sectors that increase people's income and quality of life, by improving their eligibility for a new job or providing them with tools to start their own business. The program offers training, certification, job opportunities, diplomas, and online resources to self-evaluate knowledge capabilities.

The courses that are most in-demand today are:

- Beauty consultant
- Accounting assistant
- IT technician
- Hairstylist
- Basic Computing
- Dressmaking
- Database manager
- Cook
- Browsing Skills
- Mobile Phone and Tablet Repairs

**9,819,606**  
STUDENTS

**33,447,140**  
COURSE REGISTRATIONS

**35%**  
OF TOTAL COURSE  
REGISTRATIONS ARE IN THE  
TECHNOLOGY SECTOR

This year the number of users in our digital education platforms increased by more than 20%, representing over 6.7 million additional users. The number of lessons taught increased 49%, reaching 212.6 million lectures, which is equivalent to five courses per user on average. Additionally, in 2021 we increased by more than 5 thousand the number of schools registered in *PruebaT*.



**DURING 2021 WE OFFERED DIGITAL  
SKILLS TRAINING TO MORE THAN**

**492**  
THOUSAND PEOPLE  
THROUGH THE APRENDE PLATFORM,  
INCLUDING: 1) BASIC DIGITAL SKILLS COURSES  
TO ALLOW USERS TO COMMUNICATE, TO ACCESS  
ONLINE PUBLIC, COMMERCIAL AND FINANCIAL  
SERVICES; 2) COURSES TO IMPROVE PEOPLE'S  
EMPLOYABILITY, FOSTER ENTREPRENEURSHIP  
AND DEVELOP SMALL AND MEDIUM ENTERPRISES'  
ALONG WITH 3) COURSES TO BECOME A SPECIALIST  
OR TECHNICIAN IN DIGITAL PROFESSIONS.



FOR MORE INFORMATION ON THE USE OF OUR  
DIGITAL EDUCATION PLATFORMS, PLEASE GO TO  
[APPENDIX F](#).



# ECONOMIC CONTRIBUTION

(201-1)

By promoting digital inclusion and making better use of the digital tools that connectivity provides within our reach, we strengthened our Company’s economic performance and our ability to continue contributing to the development of the countries in the region.

		 GENERATED ECONOMIC VALUE	 DISTRIBUTED ECONOMIC VALUE	 RETAINED ECONOMIC VALUE*
2020	million pesos (MXN)	839,707	805,673	34,034
2021	million pesos (MXN)	855,535	780,920	74,615
	million dollars (USD)	41,564	37,939	3,625

\* Considering that the economic value retained is equivalent to the current net profit.

(102-7, 102-45)



NOTE: FOR MORE INFORMATION ON OUR FINANCIAL PERFORMANCE, [CLICK HERE](#).

# COMMUNITY INVESTMENT

(203-1)

We make significant efforts to contribute to the development of society and our communities. We achieve this through our initiatives or by joining forces with several organizations, government institutions, and associations.

We select initiatives very carefully by considering their potential impact, the number of people who will participate and the benefits they will bring.

IN 2021, AMÉRICA MÓVIL INVESTED MORE THAN

260

MILLION PESOS (12.6 MILLION DOLLARS) IN CORPORATE CITIZENSHIP AND PHILANTHROPIC CONTRIBUTION, OF WHICH 59.2% WAS DONATED IN SPECIES, INCLUDING THE DONATION OF SERVICES.



IN 2021,

5,833

EMPLOYEES VOLUNTEERED IN DIFFERENT INITIATIVES.

WE HAVE CONTRIBUTED 19,137 HOURS OF VOLUNTEER WORK THROUGH THE VARIOUS ACTIVITIES, OF WHICH 27% WERE PERFORMED DURING WORKING HOURS.







# TALENT

(102-7)

**At América Móvil we are convinced that committed employees are fundamental for our performance.**

One of the greatest challenges we face in all the regions where we operate is the high demand of skilled digital professionals. The high demand of skilled digital professionals is happening in a wide range of industries, which will increase competition to access, attract, retain, and develop the best talent in this field.

We believe that Purpose and Culture are fundamental drivers for employee engagement and a differentiating factor when competing for talent. Therefore, this year, we reviewed our purpose and developed a strategy to communicate it to ensure that all our employees understand their role in enabling a better world, while aligning core principles, processes, and behaviors toward a sustainable business growth culture.



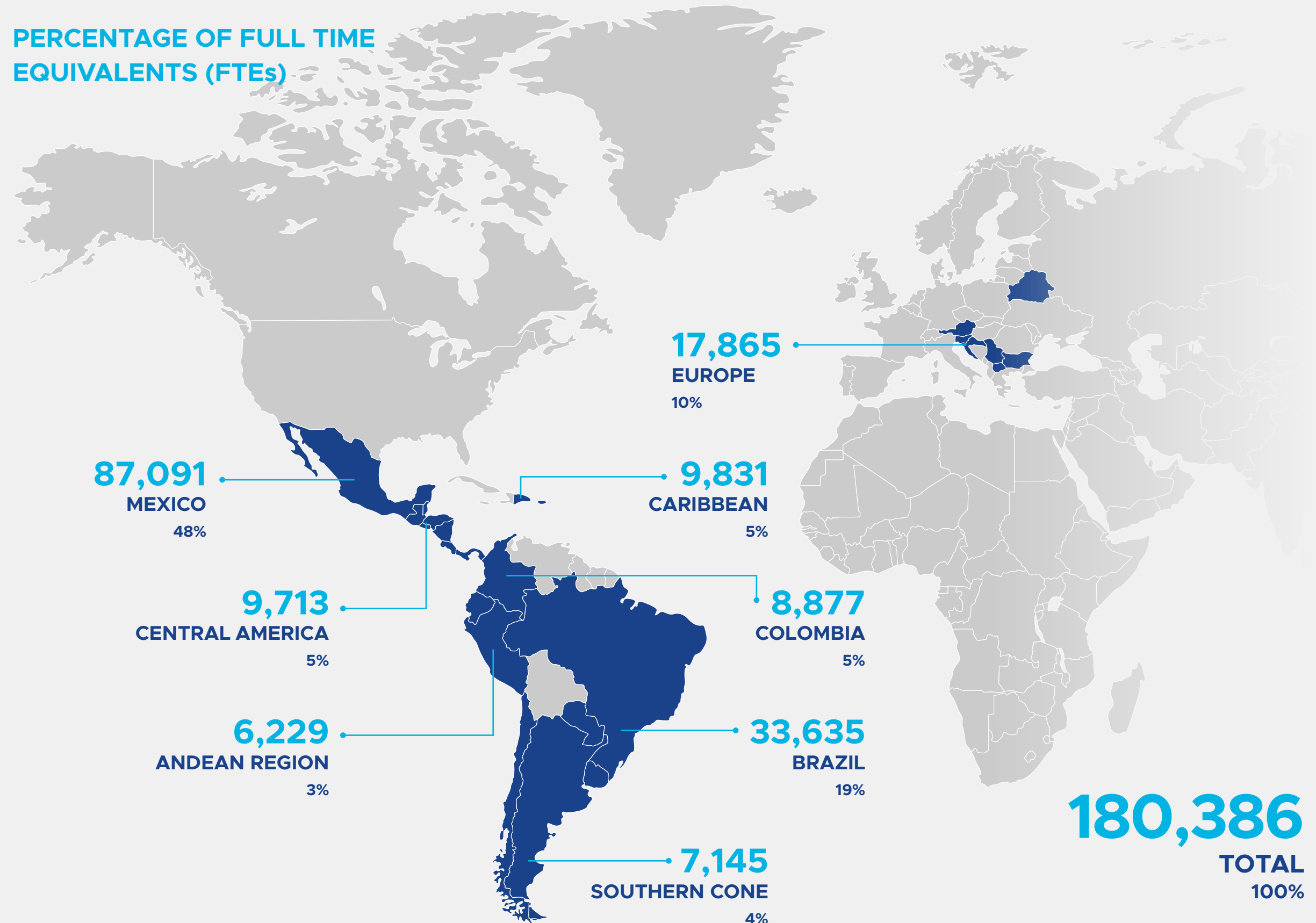
AS OF DECEMBER 31, 2021,  
AT AMÉRICA MÓVIL WE HAD

**181,205**

EMPLOYEES, OF WHICH 39% WERE  
WOMEN, 61% WERE MEN, 99% HAD  
PERMANENT POSITIONS,  
AND 1% WERE TEMPORARY.

OF THE TOTAL NUMBER OF EMPLOYEES, 20,304  
WORK FOR OTHER AMÉRICA MÓVIL BUSINESSES.

## PERCENTAGE OF FULL TIME EQUIVALENTS (FTEs)

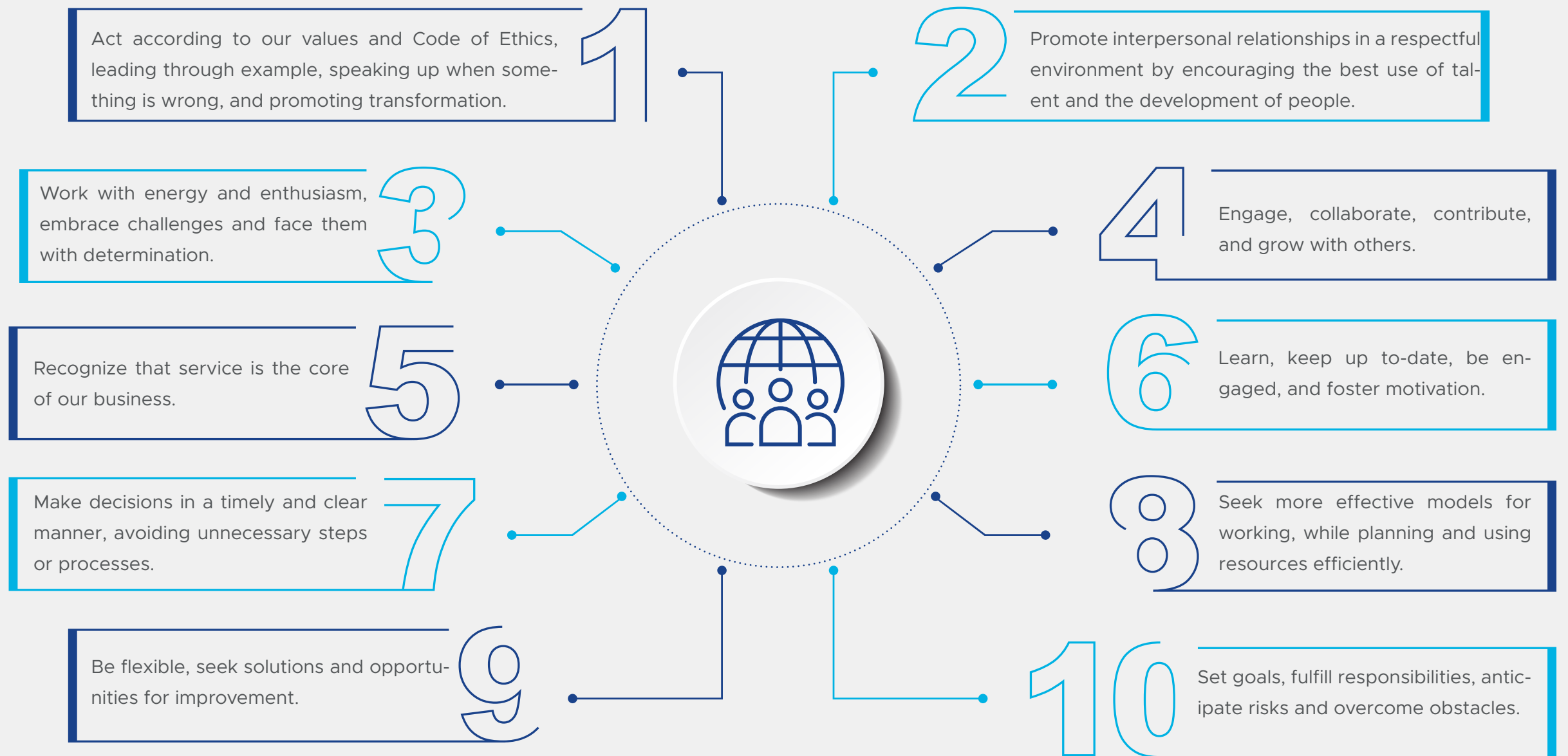




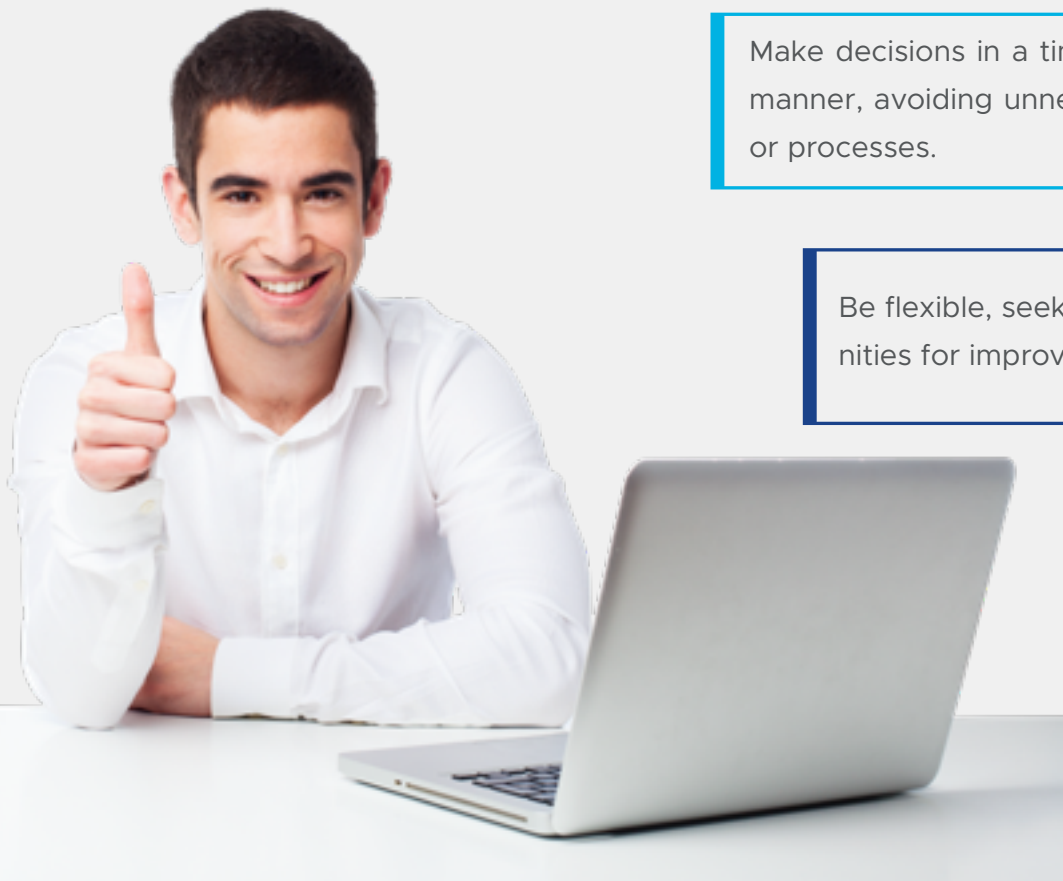
# SUSTAINABLE GROWTH CULTURE

## BEHAVIORS

Every single department in the Company plays a relevant role in our Sustainability Business Strategy and provides shared value. All América Móvil's employees, regardless of their job description, contribute to enabling a better world by adopting the following behaviors:



WE PROMOTE THESE BEHAVIORS AS PART OF DAY-TO-DAY RITUALS, PROCESSES, TRAINING, AND PERFORMANCE EVALUATIONS, AS WELL AS THE CONVERSATIONS THAT THE LEADERS CARRY OUT WITH THEIR TEAMS.





## SUSTAINABILITY WEEK

For the second consecutive year, América Móvil held the Sustainability Week. An online effort to strengthen our Sustainable Business Growth Culture and share best practices across operations.

During the whole week, we presented online conferences and webinars given by prestigious speakers from MIT University, Tuck School of Business, UN Global Compact, UNICEF, UN High Commissioner for Human Rights, Deloitte, Mercer, Dow Jones and GSMA, among others. The objective was to train our directors, junior and senior managers in a wide variety of material topics of our Sustainability Strategy:

OVER



**2,000**  
EMPLOYEES

FROM SEVERAL BUSINESS UNITS IN LATIN  
AMERICA, THE CARIBBEAN, AND EUROPE  
JOINED IN 30 HOURS OF TRAINING.

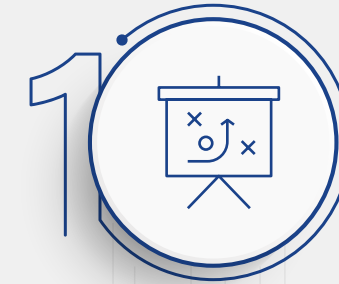


### DAY 2 – RESPONSIBLE OPERATION

Climate Change  
Waste Management & Circular Economy  
Industry Contribution to Carbon Neutral  
Climate Change Mitigation Strategy  
Climate Change Adaptation Strategy

### DAY 4 – RISK MANAGEMENT / DIGITAL DIVIDE

Risk Management Culture  
Risk Management within the Supply Chain  
Digital Divide Alignment Strategy  
Internet Access: 3G-4G Modernization Plans  
Digital Adoption: Reconnected/Aprende Tour  
Digital Abilities & Online Education



### DAY 1 – PURPOSE AND STRATEGY

Sustainability and Business Strategy  
Stakeholders' Expectations  
Shifting Priorities Post-COVID  
AMX Global Commitments  
From Purpose to Strategy



### DAY 3 – GOVERNANCE / CUSTOMER EXPERIENCE

Telecom Impact on Children and Youth  
Rights of Youth and Children in Telecom  
Human Rights in Operation and  
the Supply Chain  
AMX Third Party Due Diligence Protocol  
Customer Golden Record  
Omnichannel Initiative  
Quality Standards for Retailers



### DAY 5 – HUMAN CAPITAL

Company's Challenges Ahead  
The Employee of the Future  
Global Trends: Purpose & Culture  
AMX Third Party Due Diligence Protocol  
Labor Inclusion of Vulnerable Groups  
Health & Safety Management Systems  
Sustainability Culture and 2030 Goals





# LABOR RIGHTS

## FREEDOM OF ASSOCIATION

(102-41)

We acknowledge that our operations are based on regions with strong labor unions, and frequent labor strikes. We have broad experience in developing a constructive relationship with the unions, based on transparency, trust and mutual added value. We respect the right to freedom of association of our employees, who can choose freely to be members of a union or to participate in collective negotiations of contracts in accordance with applicable labor laws in all the countries where we operate.

As part of our management with unions, we have established a mutually agreed productivity evaluation process for unionized personnel that includes payment for performance. We have this program in place in our Brazil, Telcel and Telmex operations, which allows for a constructive results-based dialogue with the unions.

At the end of 2021, 114,680 of our employees were unionized, or 63% of our workforce is covered under a collective negotiation scheme.

## DIVERSITY, EQUALITY AND NON-DISCRIMINATION

(405-1)

Diversity enriches, it helps us better understand the needs of the different groups in the markets in which we operate, it gives us perspective, allows us to broaden our opinions, and to be more tolerant and respectful of different points of view and cultures in a globalized world. Also, it is known that diverse companies with strong non-discriminatory practices perform better in terms of efficiency, productivity, innovation, employee engagement and talent attraction and retention, thus making anti-discrimination practices a key strategic topic for companies.

This year, we developed our group-wide Non-Discrimination and Anti-harassment Policy, where we establish our zero-tolerance commitment to discrimination and harassment and the process we implement to ensure all allegations are taken seriously and handled in a confidential and kind manner. When allegations are confirmed, corrective and disciplinary actions are taken, as well as employee dismissal or legal actions, as the case may be.

América Móvil recognizes talent regardless of gender. To date, we have 39% women in the company. Of the total positions, women occupy: 52% in management positions in revenue-generating functions (commercial role), 32% in all management

positions, including junior, middle and top management, 34% in junior management positions, 21% in executive positions, and 16% in STEM (Science, Technology, Engineering, and Mathematics) related positions.

In 2021, 2,390 América Móvil employees had a disability representing, 1.3% of our workforce. Also, of our total workforce are of the following nationalities: 48% Mexican, 31% South American, 5% Central American, 5% Caribbean, and 10% European.

Following our Diversity and Inclusion Policy, we are committed to guaranteeing the same employment opportunities and economic benefits for similar responsibility and performance in a specific function. In this sense, the criteria for determining salary and other benefits are done exclusively concerning skills, job profile, organizational chart, and other objective parameters (such as tenure). No distinction is made regarding gender, age, or any other characteristic resulting in discrimination.



**FOR MORE DETAILS ON GENDER PAY, PLEASE VISIT [APPENDIX E](#).**







## HEALTH AND SAFETY (H&S)

(403-1, 403-5, 403-6)

One of our strategic goals is promoting and protecting the health, safety and well-being of our employees and visitors in our facilities. Therefore, our health and safety teams analyze, plan, and implement the necessary actions to minimize health and safety risks, as well as preventing work-related injuries or illnesses, creating a favorable work environment within the organization.

This year, we developed our Corporate Health and Safety Policy (H&S Policy) which fosters a culture of health and safety within our operations supported by management systems, in compliance with applicable local laws and regulations. The leadership and commitment of our top management team has been essential to move towards the alignment and certification of our operations under the ISO 45001 standards by 2025.

By the end of 2021, our subsidiaries Telcel, Claro Colombia, Claro Chile, Claro Ecuador, Claro Puerto Rico and all the subsidiaries of A1 Telekom Austria Group had health and safety certifications. This year, under this standard, where more than 1 million hours were allocated to health and safety training, and they had more than 300 thousand participants<sup>1</sup>.

### HEALTH AND SAFETY POLICY



*América Móvil's Health and Safety Policy seeks to guarantee a positive work environment in which the health, safety, and well-being of our employees and those within our work centers is fostered and protected. Throughout the Policy, we set the principles and guidelines by which all employees should live as part of our health and safety culture so that the corresponding teams may manage latent, potential, and inherent risks.*

*To ensure that América Móvil's H&S standards are well known by our employees, our Policy mandates that they should be aware of the training programs and know how to avoid unsafe situations, respond in a timely manner to unexpected events (fires, earthquakes, social disturbances, etc.) and to encourage a strong commitment with their health and safety, as well as of those around them.*

TO DATE,

**84%**  
OF OUR OPERATIONS HAVE HEALTH  
AND SAFETY PROGRAMS.



Among the most relevant results of the health and safety programs are the following:

**51%** OF OUR OPERATIONS  
HAVE HEALTH AND SAFETY, SUCH  
AS IDENTIFICATION OF RISKS AT  
THE WORKPLACE TO REDUCE  
OCCUPATIONAL INJURIES.



MORE THAN **51%** OF THE  
COUNTRIES PROVIDED WORK  
MANAGEMENT PROGRAMS AT HEIGHTS  
TO MINIMIZE RISKS AND ACCIDENTS  
FOR EMPLOYEES AND CONTRACTORS,  
INCLUDING: REGULAR MEDICAL  
EXAMINATIONS, TRAINING ON HOW  
TO SAFELY PERFORM WORKING  
AT HEIGHTS, AND PROPER USE OF  
PROTECTION EQUIPMENT.



**46%** OF OUR SUBSIDIARIES HAVE  
STRESS MANAGEMENT PROGRAMS.

ADDITIONALLY, **65%** OF  
OUR OPERATIONS HAVE OTHER  
PROGRAMS THAT SEEK TO IMPROVE  
THE WORKING CONDITIONS OF OUR  
EMPLOYEES. INCLUDING TRAINING  
ON ELECTRICAL SAFETY, EMERGENCY  
RISKS AND DISASTER RESPONSE,  
PHYSICAL SECURITY PROTOCOLS,  
AND THE GUIDELINES OF SAFETY  
MANAGEMENT SYSTEMS.



AROUND **46%** OF OUR  
OPERATIONS HAVE HEALTH AND/OR  
NUTRITION PROGRAMS, WHICH MAINLY  
OFFER PLANS TO PROMOTE THE  
DIETARY CARE OF OUR EMPLOYEES  
AND FOSTER HEALTHY HABITS THAT  
IMPROVE THEIR QUALITY OF LIFE.



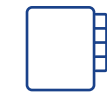
IN **16%** OF OUR OPERATIONS,  
AWARENESS AND DRIVER EDUCATION  
WORKSHOPS ARE HELD.



**41%** OF OUR SUBSIDIARIES  
PROVIDE BRIGADE TRAINING IN THE  
WORKPLACE FOR EVACUATION AND  
EMERGENCY CARE.

<sup>1</sup> More than 100 thousand employees took at least 3 courses.





# HUMAN CAPITAL MODEL

(401-1)

**Our employees are one of our most important stakeholders, therefore we have developed a Human Capital Model that we are constantly adapting to face our industry challenges.**

Our Human Capital Model focuses on business performance and a positive customer experience. We believe that one of the key strengths of our model is based on the independence that we provide to each of our subsidiaries to manage their own personnel within the general policies and guidelines of human resources in the Company's headquarters.

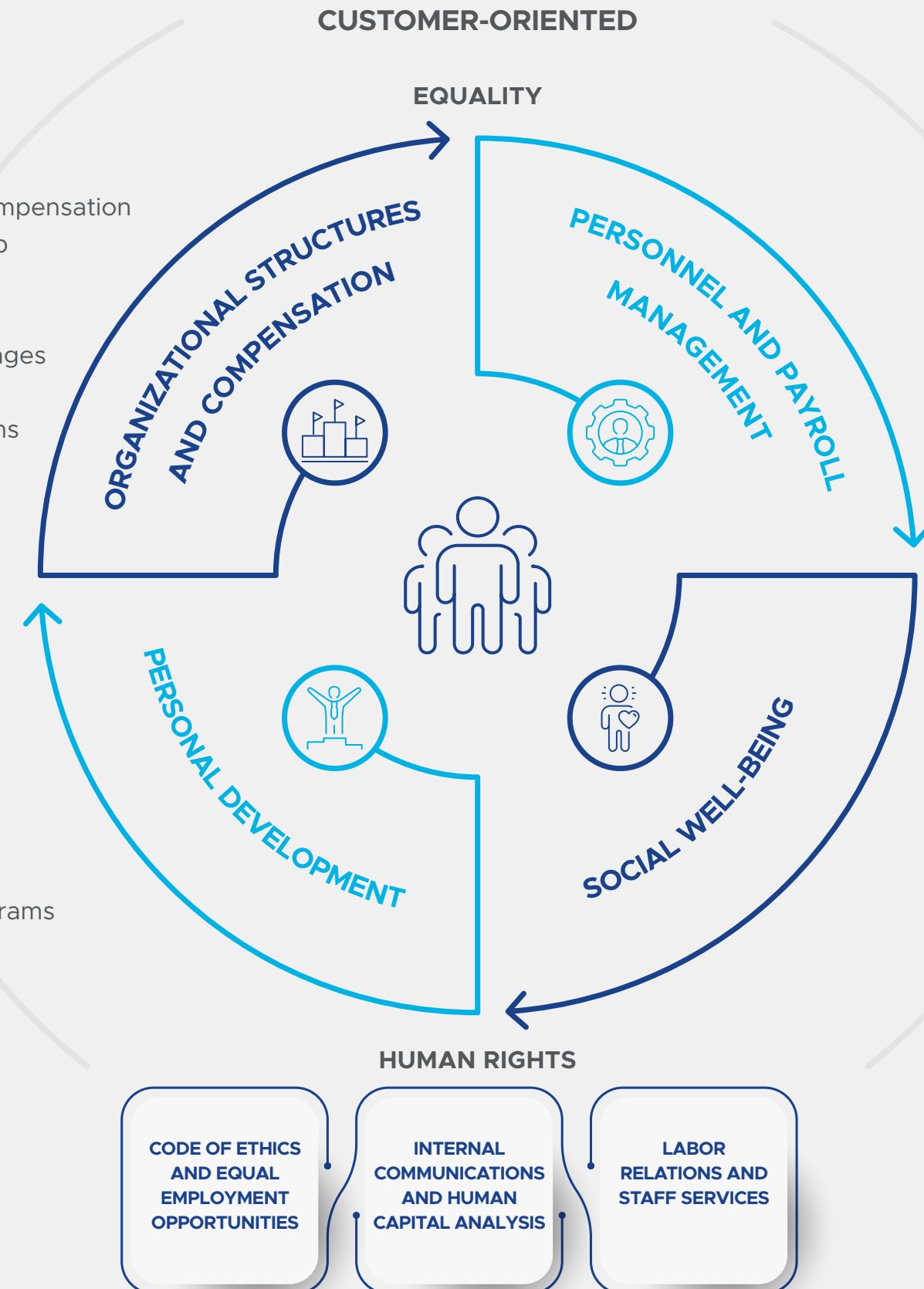
- Organizational structures
- Management of salaries and compensation
- Analysis of job functions and job descriptions
- Job valuation
- Compensation scales, salary ranges and market research
- Productivity and bonus programs linked to the Company's performance indicators (EBIT)

- Inventory of Human Resources
- Key employees
- Recruitment and selection
- Induction to the Company and the position
- Performance evaluation system and indicators
- Training and development programs
- Employee climate survey
- Culture

- Staff administration
- Time management
- Benefits management
- Payments and settlements
- Accounting transfers to official entities and third parties
- Social well-being, health and safety and environment

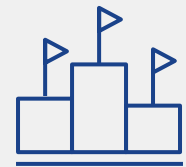
## RESPECT

- Personal growth
- Health
- Culture and recreation
- ASUME (constant personal development, self-fulfillment, balanced personal growth)





People are at the center of our strategy. We base our Model on the Code of Ethics and our Diversity and Inclusion Policy; also on proper internal communication, analysis of human capital and on the work of labor relations and staff services. The Model always considers dignity, equality, respect, and human rights, and divides the key actions into four main areas:



## ORGANIZATIONAL STRUCTURE AND COMPENSATIONS

We carry out periodical reviews of our job market value and job descriptions to align them with business requirements. In addition, we have productivity programs and bonuses for results considering the Company's financial results in terms of earnings before income tax (EBIT). Also, in some operations, we have an EESG bonus.



## PERSONNEL AND PAYROLL MANAGEMENT

The Corporate Human Resources Department supervises payroll and benefits management, health and safety indicators and establishes general guidelines regarding personnel management.



## SOCIAL WELL-BEING

We promote the personal and social well-being of our employees contributing to their integrated development through several human development programs in the areas of Personal Growth, Health, Culture, and Recreation. Additionally, we have "ASUME", a program that seeks to achieve the development of individuals by promoting balanced personal growth and its contribution to social environment by working on people's physical, emotional, social, economic, artistic, intellectual, moral, and spiritual qualities.



## PERSONAL DEVELOPMENT

The Corporate Human Resources Department establishes guidelines and indicators for the employee climate survey, performance evaluation systems, as well as training and development programs, in addition to inventories of human resources to detect talent.

We promote the personal and professional training of our employees according to the needs of the position. All promotions are based on merit.

The Company suspended hiring after the Covid-19 contingency, except for those related to customer service positions for the reopening of Customer Service Centers. This explains why most of the positions covered by external candidates were entry level and employees without command. The rest of the positions were mainly covered by internal candidates.

For América Móvil it is important to maintain a low employee turnover. However, after the health contingency, the voluntary turnover rate this year increased significantly compared with the ones we presented pre-COVID. In 2021, our total turnover rate was 11.94% and 8.86% in the case of voluntary turnover.



OUT OF

**39,878**  
OPEN POSITIONS,

16% WERE FILLED BY INTERNAL CANDIDATES.

The average hiring cost per FTE was 11,903 Mexican pesos in 2021. At América Móvil, the employment cost is fixed, so we have the exact cost within all levels and positions. We suspended hiring in the second quarter of 2020 due to the sanitary emergency, therefore, the relative price of hiring per candidate increased.

In the case of the Company's merger and acquisition processes, the workforce has been incorporated, creating synergy and leveling benefits to all employees. In the case of spin-offs, employees are transferred from the functions being spun off, respecting salary, seniority, and benefits. Whereas in case of a joint venture, the conditions are agreed upon between the two companies.



# TRAINING

(404-1, 404-2)

**At América Móvil we make a constant effort to promote the development of our employees. A key component of this effort is offering ongoing training, both online and in person in all areas and at all levels.**

We offer mandatory training courses throughout América Móvil that provide employees with the basic skills and compliance principles they need to carry out their daily activities.

This type of training includes basic courses in occupational health and safety, information security and information technologies in the workplace, diversity, code of ethics, anti-corruption, data privacy, among others. In the same manner, we offer non-mandatory courses to improve employees' skills including leadership courses, project management (agile methodologies), to name a few. This year, technological partners supported us with webinars to enhance our knowledge in new technologies.

In 2021, we continued the Customer Experience and Sales Training for América Móvil employees, helping them develop a strategy aligned with the objectives and the necessary skills on customer experience throughout the Company. The training seeks to establish employees' confidence, knowledge, and abilities to meet and exceed customer expectations.

For us, it is vital to focus on enhancing the customer experience through our employees to continue building authentic customer loyalty culture and ensure the growth of the business in the long-term. This program covers 4% of full time employees within the Company.

We will continue to provide leadership programs to promote employees' communication skills and tools to empower and inspire América Móvil's multidisciplinary teams, aligned with organizational culture and the Company's goals, resulting in an environment of empowerment, commitment, and trust.

Developing future organizational capabilities to face market challenges, gives continuity to the business, promotes new ways of collaboration that allow the organization to lead in the market and increases employee engagement. This program covers 9% of full time employees within the Company.

Generating leaders helps us drive employee productivity by building their confidence and creating a positive work environment.







## CAPACÍDATE CARSO (CARSO TRAINING PLATFORM)

In addition, our operations carry out their own training needs detection (TND) process so that the training and development programs in which our employees participate address their specific needs. The following are some of the training programs implemented in the Company:

- Development of management skills, including training of high-performance teams, project management and coaching programs.
- Technological training.
- Human development programs, such as communication, negotiation, and interpersonal skills workshops.
- Development of skills such as creativity and innovation, as well as agile methodologies.

In 2021, 75% of employees participated in non-mandatory courses that helped not only to improve the professional performance of employees, but also to adapt to the new normal. At the end of the year, we provided close to 11 million hours of mandatory and non-mandatory training, resulting in an average of 61 hours of training per full-time equivalent employee. In this sense, we invested more than 300 million MXN (16 million dollars) in training.

The objective of the *Capacítate Carso* platform is to continuously train and develop our employees. By using this platform, employees can view the courses that have been assigned to them based on their job profile, the time remaining to complete them, as well as the courses they have already completed. The platform also enables us to share courses offered in a single operation to the rest of the Group, promoting the exchange of good practices throughout the Company.

On the other hand, *Capacítate Carso* allows the Human Resources team to obtain key information of the development stage achieved by each employee and general statistics on the progress reached in a certain area or topic within the group.



IN 2021, OUR EMPLOYEES  
WERE OFFERED

**1,155,055**  
HOURS OF TRAINING  
THROUGH THE PLATFORM.



# PERFORMANCE EVALUATIONS

(404-3)

Every year we conduct performance evaluations across the organization to identify areas in which our employees can demonstrate their skills and detect specific talents. Evaluations are carried out at all levels within the Company and analyze performance in abilities such as establishing productive relationships in the workplace, focus on customer service, leadership of work teams, service commitment, talent development, and communication skills, among others.

For the performance evaluation, the manager-employee feedback process is carried out on the aspects of the fulfillment of the established objectives, as well as the level of development of abilities that the employee demonstrates for the best performance of its position. Additionally, in most of our subsidiaries, we establish the performance, professional and personal growth targets for each employee to measure individual contribution to achieving the Company's strategic objectives. In the rest of the subsidiaries, performance targets are evaluated by division.

OUR 2030 GOAL IS TO IMPLEMENT  
PERFORMANCE EVALUATIONS ON

98%

OF OUR WORKFORCE.

ADDITIONALLY, WE ARE COMMITTING TO ASSESS  
AT LEAST 95% OF OUR SENIOR MANAGERS WITH  
360° EVALUATIONS EVERY THREE YEARS.



# WORK ENVIRONMENT

At América Móvil, we conduct annual employee climate surveys to understand the perception that our employees have of the Company and identify how each of the areas within our subsidiaries are performing regarding several labor issues, such as respect within work teams, satisfaction with employee benefits, among others. The survey allows us to have a specific idea of what our improvement objectives should be and, based on them, design specific action plans for each area that includes those elements where opportunities for improvement are detected.

We have carried out the employee climate survey for 10 years in all our operations. One of the 2030 goals of our Sustainability strategy is to improve the result by 1% of our work environment survey year on year, with a participation rate over 90%.

In 2021, more than 91.26% of our employees participated in the employee climate survey, with a score of 85.29%. We continue to strengthen our efforts to communicate and involve our employees in evaluating our work environment to achieve our annual goal.

Once we have processed the responses, our Corporate and local Human Resources teams review the results in detail and present them to each division, identifying key opportunity areas and action plans to improve the divisions' and the overall Companies' scores.

Additionally, in some of our operations, we measure the Employee NPS monthly to follow employee satisfaction trends.



# LABOR BENEFITS

(401-2, 401-3)

**All our employees, receive a fair living wage and benefits without exception, as stipulated by applicable laws in the countries where they work. Also, we offer additional benefits in some of our operations, such as: life insurance, private medical expenses insurance, temporary or permanent disability insurance, dental insurance, parental leave, financial assistance for the purchase of school supplies, preferential prices to acquire our devices, transportation service to and from our work centers, financial assistance to cover funeral expenses, and paid leave in the event of the decease of a family member.**

We also comply with applicable laws regarding the termination of employees, whether due to dismissal, retirement, or voluntary resignation. It is important to note that in the countries and regions where we operate, the compensation offered to both men and women (unionized or not) is the same, reflecting our culture of equality.

América Móvil has Compensation Policies aligned to the strategy, organizational culture, and objectives of each company, seeking to compensate each employee in a balanced manner according to their performance and contribution to each subsidiary, with equal wages internally and competitive compared with the market in the region. We have tools that allow to manage wages in a structured manner with several compensation plans, financial incentives, and talent retention.

The policies promote equality, respect, diversity, the work profiles, and recognize the abilities and potential of each employee, ensuring that the positions are filled with the most competent candidate considering equal opportunities and without discrimination of any kind.

Additionally, all our subsidiaries have maternity and/or paternity leave policies in alignment with local regulation.



AT AMÉRICA MÓVIL,  
THE RETENTION RATE AFTER MATERNITY IS

**87%**  
AND PATERNITY IS 94%.





FROM 1999 TO DATE,

218,834

EMPLOYEES HAVE BENEFITED FROM  
ASUME'S ON- AND OFF-THE-JOB TRAINING.



## HEALTH & WELL-BEING

(403-6)

In response to the health emergency caused by COVID-19, we provided programs to ensure awareness of the guidelines to prevent the spread of the pandemic. Additionally, to avoid work stress, absenteeism, violence, harassment, discrimination, anxiety, and emotion management, we incorporated conversations and courses on psychosocial risks taught to employees.

### INTEGRAL HUMAN DEVELOPMENT OF EMPLOYEES AND THEIR FAMILIES

#### ASUME PROGRAM



ASUME is a human development program that contributes to the integrated progress of individuals and motivates them to get in touch with themselves and initiate a process focused on the constant search for self-development seeking to be a better person and thus, enhance the environment in which each person develops (family, the workplace, studies, etc.), and committed to contributing in the progress of the country.

ASUME is based on three main points:



1. Constant improvement; there is no limits to being better.



2. Self-competition.



3. The balanced improvement in eight aspects of the person: Physical, Affective, Social, Economic, Aesthetic, Intellectual, Moral, and Spiritual.

The documented accomplishments that participants achieve by being part of ASUME are:

- Enhanced self-esteem and potential development, improving personal, family, work, and social relationships.
- Personal growth, satisfaction, and change in vision in all aspects (physical, emotional, social, economic, aesthetic, intellectual, moral, and spiritual) resulting in a greater sense of belonging and social contribution.





## SOCIAL WELL-BEING

It contributes to the comprehensive human development of employees and their families. Social Wellbeing is based on the following points of action:

Activities are carried out in different areas: Training, Health, Culture, Recreation, Environment and Education.



SELF-ESTEEM AND  
LIFE PROJECT



SECURITY AND  
CONFIDENCE



CULTURE AND  
TRADITIONS



CONSTANT AND  
PERMANENT IMPROVEMENT



VALUES AND FAMILY



HEALTH AND  
INFORMATION



ENVIRONMENT



## TRAINING

By carrying out events such as conferences, workshops, lectures, and activities that contribute to creating in people a “Culture of Transformation Towards Development.” Since 2005, this training program has inspired more than 893,705 people in Mexico and Latin America in 14,748 events for personal and family growth and some companies with the community in general.

Workshops on environmental care are also held, contributing to daily habits for the sustainable use of natural resources.

## HEALTH

Its objective is to promote a culture of prevention and awareness as a habit of health care for employees and their families through physical and mental health activities:

- Conferences, courses, workshops and preventive and educational health campaigns.
- Tournaments and events with various sports.

From 2005 to date, 16,230 events have been held and 979,270 employees and their families have benefited from this program which have improved their health and physical condition, preventing chronic degenerative diseases.

## CULTURE AND RECREATION

Preserving our cultural values is a priority; therefore, through cultural and artistic events, employees and their families share their free time in an enhancing and creative manner, while learning about protecting, and rescuing our culture and traditions.


In this area, events include plays, guided visits to historical monuments and museums, conferences, workshops, and musical concerts.

From 2005 to date, 10,075 events have been held, where 1,468,570 people, including employees and their families, have shared their free time in activities that preserve and rescue our culture and traditions.

It is worth mentioning that this social responsibility of the América Móvil Group in Mexico has contributed to benefit the community in general in some of the cities where these social wellbeing activities are carried out.



# ENABLING A BETTER BUSINESS FRAMEWORK



Our corporate governance practices are governed by our bylaws, the Mexican Securities Market Law and the regulations issued by the CNBV. We also comply with the Mexican Code of Best Corporate Practices (*Código de Mejores Prácticas Corporativas*). On an annual basis, we file a report with the Mexican Stock Exchange regarding our compliance with the Mexican Code of Best Corporate Practices.



The solidity of our corporate governance practices is the basis of our sustainable development. We constantly review our policies and compare with the best international practices to improve corporate governance.

## BOARD STRUCTURE

(102-18, 102-19, 102-20, 102-22, 405-1)

Our organizational chart and governing bodies are comprised by professionals from different fields, academic experience, ages, and gender. There are 12 members of the Board—of which three of them are women—elected on an annual basis. We have benefited from the valuable contribution of financial experts, industry experts, and the long-time experience of some of our members.

There are two committees: Executive Committee, elected from among the directors and alternate directors, and the Audit and Corporate Practices Committee comprised of independent members of the Board of Directors.

We believe that our Board is comprised of men and women with diverse skills, experience and backgrounds that promote:

- competitive advantage;
- greater productivity and innovation;
- broad understanding of opportunities, subjects, and risks;
- inclusion of different concepts, ideas, and relationships;
- enhanced decision-making and dialogue; and
- strong capacity for supervising the organization and its governance.



FOR DETAILED INFORMATION ON THE MEMBERS OF THE BOARD OF DIRECTORS AND BOARD PRACTICES, SEE [APPENDIX G](#).



AS PART OF THE COMPANY'S COMMITMENT WITH DIVERSITY,  
**WE COMMITTED TO INCREASE THE NUMBER OF FEMALE DIRECTORS OF THE BOARD TO THREE BY 2025. THIS YEAR WE MET THE TARGET BY INCLUDING TWO MORE WOMEN REACHING**

**21.4%**  
**OF FEMALE PRESENCE.**



OUR BOARD DIVERSITY POLICY IS AVAILABLE [HERE](#).





# CORPORATE BEHAVIOR

## RISK MANAGEMENT

(102-17, 102-20)

In 2019, we created the Compliance Office to address the challenges that the Company has identified. It is a multidisciplinary team of professionals from different fields and areas of our organization including legal, operations, auditing, information technology, among others, that have the mandate to enforce the Integrity and Compliance Program, as well as to secure our Company's long-term reputation and resilience. It is of strategic relevance and brings independent governance to ensure compliance in all our operations. The Compliance Office has developed a more comprehensive risk management strategy focused on: prevention, timely detection, impact assessments and mitigation; along with establishing necessary contingency plans.

Additionally, it establishes proper and effective control, surveillance, and audit systems, which ensure compliance with high integrity standards within the organization and across our value chain. The latter by implementing a Third-Party Due Diligence Protocol as part of our operating procedures with business partners.

América Móvil's Chief Compliance Officer report to the Chief Executive Officer on a quarterly basis, as well as to the Board's Audit and Corporate Practices Committee, the highest governance body that supervises risk management within the Group, and holds extraordinary meetings as needed.

During the last three years, we have worked systematically to identify potential risks for our operations, including those related to corruption, money laundering, personal data and information security, cybersecurity, human rights, macroeconomic, regulatory, environmental, market, labor, climate change, physical and social, among others. This process is first carried out at the corporate level and subsequently in all our subsidiaries.

Furthermore, during 2021 we worked on the selection of a risk management tool to standardize processes across business units and operations. We are currently strengthening our Risk Management governance by formalizing a committee that includes officers from several business units such as the Chief Information Security Officer, Compliance, Audit, Sustainability and Operations.



**FOR MORE INFORMATION REGARDING OUR RISK MANAGEMENT GO TO [APPENDIX B](#) OF THIS DOCUMENT.**



**THIS YEAR, AMÉRICA MÓVIL, GLOBAL HITSS AND AMERICA MÓVIL CONTENIDO RECEIVED THE TRACE INTERNATIONAL INC. CERTIFICATION ON ANTI-BRIBERY AND ANTI-CORRUPTION. ALSO,**

**33%**  
**OF OUR SUBSIDIARIES HAVE THE ISO:37001 CERTIFICATION ON ANTI-CORRUPTION.**

## CODE OF ETHICS

(205-2)

Our Code of Ethics is the basis of the Integrity and Compliance Program, it governs our daily actions and decision-making processes. It also establishes the following obligations for América Móvil employees, contractors and business partners: read and adhere to the Code of Ethics, comply with its principles, behave in an ethical manner, and report any illegal act or breach of the Integrity and Compliance Program through the formal anonymous Whistleblower portal, where legal protection is provided if necessary: <https://denuncias.americamovil.com/>.

Penalties for non-compliance with the Code of Ethics and our Policies, both for employees and third parties, may be administrative, labor or even legal, depending on the seriousness of the act and will be sanctioned in accordance with the internal labor regulations and/or applicable legislation.





AT THE END OF THE YEAR,

95.8%

OF EMPLOYEES HAD BEEN  
TRAINED AND CERTIFIED ON  
THE CODE OF ETHICS.



THE FULL TEXT OF OUR CODE OF ETHICS AND  
ASSOCIATED INTEGRITY AND COMPLIANCE  
PROGRAM (ICP) POLICIES MAY BE FOUND ON  
OUR WEBSITE AT AMÉRICA MÓVIL, IN THE  
CORPORATE GOVERNANCE SECTION, [HERE](#).

## ETHICS, HUMAN RIGHTS AND COMPLIANCE MANAGEMENT

(102-17)

Our Compliance Division has developed an Integrity and Compliance Program (ICP), with our Code of Ethics as its foundation. Such program codifies the ethical principles that govern our business and promotes, among other things:

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

The Integrity and Compliance Program and our Code of Ethics apply to all our officers, senior management, directors, employees, the Company's supply chain, and/or other business relationships.

To ensure the implementation of our Code of Ethics and the Integrity and Compliance Program, the Compliance Office has the following initiatives, among others:

- the development of policies and other Company guidelines to comply with current legislation;
- the identification, prevention and mitigation of operational and legal risks in order to ensure the Company's long-term reputational value and generate greater certainty to its value chain;
- the establishment of proper and effective control, monitoring, and auditing systems, which constantly and periodically examine compliance with integrity standards throughout the organization; and
- the management of the Whistleblower Portal and coordination of training on compliance issues.

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



## COMPLIANCE PORTAL

(102-17, 102-25)

Also, at the end of the year, the team launched a Compliance Portal where all our employees must sign in and adhere to the Code of Ethics. In this Portal, our policies, training, formats, and procedures are available to ensure the effective implementation of our Integrity and Compliance Program, which includes regulatory compliance, personal data protection, anti-money laundering and terrorism financing, anti-corruption, crime prevention, labor compliance and social security, equality, human rights protection, environmental protection, and our whistleblower portal.

The Compliance Portal is also available for our business partners once they have completed our Third-Party Due Diligence process. For more information regarding third party evaluations and compliance to Our Code of Ethics, go to the Supply Chain Management section.

Furthermore, the Compliance Portal has allowed automated compliance processes related to our Gifts Policy, as well as our Third-Party Due Diligence Protocol. In the near future, we will have our Sponsorships, Donations, and Conflict of Interest Policies available.

To learn more about our policies and protocols, please send an email to:

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

## WHISTLEBLOWER PORTAL

(102-17)

Our Whistleblower Portal allows us to consolidate complaints from employees, third parties and other business partners across all our operations, which are managed and investigated by the Compliance Office of América Móvil and each subsidiary, along with a multidisciplinary group of Company officials that comprise the respective Ethics Committees.

From January to December 2021, we received 5,879 complaints through the Portal, of which we accepted 2,949 for investigation, the rest were rejected for several reasons including operational and/or customer service issues that were directed to the corresponding areas, duplication of complaints and complaints that were not related to the Company, among others. The accepted complaints pass through a desk and field investigation process: 869 resulted in a violation of the Code of Ethics; 1,384 were non-admissible because we did not find non-compliance; and 696 were under review at December 31st, 2021.

Of the total complaints, 15% refer to information privacy issues, 0% to corruption, 0% to freedom of expression, 4.8% to unequal or discriminatory treatment, 16.1% to workplace harassment and 3% to sexual harassment.

For the past 5 years we have not had any incidents related to corruption.

Given the number of Human Rights related complaints received during the year, we implemented a gap analysis that led to strengthening our human rights policy. Furthermore, we intend to advance on in-depth human rights assessments during the following years to identify potential risks and develop the necessary mitigation plans at corporate and subsidiary level.

Also, during 2021 we implemented along with an external consultant, the diagnosis of sexual and labor harassment at América Móvil's Headquarters and Telcel. We have plans to expand this initiative to all subsidiaries in 2022 and 2023.



**TO LEARN MORE ABOUT OUR WHISTLEBLOWER PORTAL, THE COMPLAINTS INVESTIGATION PROCESS, AND THE ETHICS COMMITTEE, PLEASE VISIT [APPENDIX G](#) AND OUR [SUSTAINABILITY WEBSITE](#).**



**FOR MORE DETAILS REGARDING COMPLAINTS AND SANCTIONS, GO TO [APPENDIX G](#).**



## DATA SECURITY

(102-19, 102-20)

Technological evolution, IAAS, IoT solutions and 5G, along with the expansion of digitization in all aspects of our daily lives has made cybersecurity a major concern for organizations, governments, families, and individuals in general.

Cyberattacks, the theft of sensitive information, as well as new and increasingly sophisticated forms of cybercrime, are critical issues that we address through our Information Security Strategy. We manage information security by efficiently securing important data, both financial and confidential, and minimizing the risk of illegal or unauthorized access.

This year, we developed a Global Security Operations Center (SOC) managed by Scitum, a subsidiary of TELMEX specialized in Cybersecurity, including a cyber-intelligence team to identify potential threats. The SOC fulfills the dual function of securing all our operations, to provide confidence to customers about our services and solutions, besides delivering cybersecurity products and advisory services to our corporate clients, to help them stay one step ahead of these challenges.

This centralized model has allowed us to leverage personnel, facilities, and processing capacity by standardizing security levels across subsidiaries, while streamlining the process by at least 18 months.

Oscar Von Hauske, Chief Fixed Operations Officer, Chief Information Security Officer (CISO), and Member of the Board of Directors of América Móvil and Telekom Austria Group, leads the Information Security Efforts within the entire Company. The new governance structure allows for our subsidiaries' Information Security Committees and Scitum<sup>1</sup> personnel to work closely at the incident detection level, including the Corporate Teams and Corporate Committee in the incident management stage, or the top management in the case of serious events or events with high economic and reputational impact.


All our operations processes are aligned with the ISO 27001 on information privacy and security and other international standards<sup>2</sup> that guarantee the proper operation of activities.

To ensure the correct implementation of our strategy and the ISO 27001 Security Management System, we have also established a communication mechanism between operations, which allows us to manage our needs and send alerts in a timely manner.

**81%**   
**OF OUR OPERATIONS ARE  
ISO 27001 CERTIFIED<sup>3</sup>.**

**WE HAVE SET THE TARGET OF ACHIEVING  
100% OF OPERATIONS CERTIFIED BY 2025.**

**IN 2021, WE OFFERED AN ONLINE INFORMATION  
SECURITY TRAINING TO**

**111,374**   
**EMPLOYEES, INCLUDING PART TIME  
AND CONTRACTORS THROUGH OUR  
CAPACÍDATE CARSO (CARSO TRAINING)  
PLATFORM.**

**ADDITIONALLY, WE CONTINUE TO CARRY OUT  
CYBERSECURITY AWARENESS CAMPAIGNS  
THROUGH EMAILS, ONLINE GUIDELINES,  
AMONG OTHERS.**

<sup>1</sup> Scitum is the leading cybersecurity company in Mexico, with presence in Latin America, the United States, and some European countries. They provide services for the entire cybersecurity cycle, including consulting and managed services. Scitum is part of Telmex, and Grupo Carso.

<sup>2</sup> We also have other certifications such as PCI DSS, SOC 1 Type II, SOC 2 Type II, Level V HSHA-WCQA and Eco-Data Centers, to name a few.

<sup>3</sup> Telcel, Telmex, Global Hitss, Telvista, Scitum, TRIARA and Consorcio Red Uno, Claro Brazil, Claro Colombia, Claro Chile, Claro Peru, Telekom Austria Group (excluding Serbia) and Claro Enterprise Solutions.





Following COVID-19, our corporate information security team reviewed security incidents management processes and protocols, updating Disaster Recovery Plans (DRP) to safeguard critical information, along with Business Continuity Plans (BCP) to restore fixed and mobile services as soon as possible. All operations continue working to bring them down to subsidiary level, establishing responsible officers and applicable scenarios.

In order to be updated in the latest trends, once a year, we carry out the virtual América Móvil Security Symposium with the participation of more than 100 people per day, including all heads of Information Security of all our subsidiaries, information technology engineers, commercial and customer experience areas, among others covering topics such as cloud security, 5G security, and malware<sup>1</sup>.

During 2021, we did not have information security incidents that resulted in sanctions in any of our operations. However, we had two zero-day incidents related to the Active Directory:

December 24th – Claro Colombia. The incident affected billing, collection, fixed services activation and customer service systems for 48 hours.

December 31st – Claro Brazil. The incident affected 10% of billing, collection, mobile services activation, customer service, SOC, Proxy and SIEM systems for 12 hours.

None of these incidents resulted in data breaches or loss of personally identifiable information (PII). After the incidents the IP addresses were blocked and we contacted all subsidiaries, as well as the software and antivirus developers to create the necessary patches to prevent similar attacks in the future.

<sup>1</sup> Software that is specifically designed to disrupt, damage, or gain unauthorized access to a computer system.



## DATA PRIVACY GOVERNANCE

The protection of personal data and privacy in communications is crucial for telecommunications companies. Society's demands for better privacy have resulted in strict regulations for processing personal information to guarantee confidentiality and the right of each person to decide on the use of their personal data.

At América Móvil, we introduced our Privacy Program to enhance our protection standards and developed a Privacy Policy aligned with the highest international standards, defining the corporate benchmark for personal data protection across operations beyond local applicable legal provisions.

Our Privacy Program is based on five fundamental initial points:

1. The creation of a Privacy Team including local experts in the laws and best practices of personal data protection.
2. A Privacy Risk Assessment to identify threats and reduce our exposure, including mitigation plans to reduce their incidence.
3. The implementation of standard policies in our operations in compliance with the highest international standards.
4. The implementation of a comprehensive training program and a coordinated communication strategy.
5. Continuous monitoring of our subsidiaries to ensure compliance with all privacy requirements.

We have dedicated teams in every subsidiary overlooking privacy issues working on risk assessments and improving guidelines for the appropriate use of personal information and the physical, technical, and administrative security measures that all our operations, employees, subcontractors, and authorized Third-Parties must comply with.

To ensure that all América Móvil employees comply with these standards, in 2021 we developed the material for an online training course which will be mandatory for all employees and must be completed in the first quarter of 2022. Shortly after, the same training protocol will be extended to vendors. Additionally, we continue implementing communication campaigns to ensure a comprehensive understanding of our policy and best practices.



THIS YEAR,  
**TELCEL ACCREDITED ITS SURVEILLANCE  
AUDIT WITH ZERO NON-CONFORMITIES  
AND WILL HAVE A SECOND REVIEW IN THE  
FOURTH QUARTER OF 2022 TO RENEW OUR DATA  
PROTECTION CERTIFICATE.**



AS A RESULT OF OUR COMMITMENT  
TO PERSONAL DATA PROTECTION,  
**OUR SUBSIDIARIES IN CHILE AND PERU  
WERE RECOGNIZED BY THE  
NGO DIGITAL RIGHTS AS THE  
TELECOMMUNICATIONS COMPANY  
THAT BEST PROTECTS ITS CUSTOMERS'  
DATA IN ITS REPORT "WHO PROTECTS  
YOUR DATA".<sup>1</sup>**



**CLARO PERU IS PUBLISHING ITS  
PRIVACY POLICY IN QUECHUA, THE  
ORIGINAL LANGUAGE OF PERU,  
ON ITS WEBSITE.**

**WE WILL ADOPT IN OTHER REGIONS THIS  
TYPE OF INITIATIVES IN ORDER TO INCREASE  
TRANSPARENCY TO THOSE WHO HAVE ENTRUSTED  
US WITH THEIR PERSONAL DATA.**



**OUR PERSONAL DATA PRIVACY POLICY IS  
AVAILABLE [HERE](#).**

<sup>1</sup> CHILE: Quien Defiende tus Datos. 2021 <https://www.derechosdigitales.org/wp-content/uploads/QDTD-2021.pdf>  
PERU: Quien Defiende tus Datos. 2020 <https://hiperderecho.org/qdtd2020/>



# COMMUNICATIONS PRIVACY

(418-1)

We are committed to the protection of our users’ rights and freedom of expression. For this reason, our policies prohibit interference in the communications of our clients, as well as listening, manipulating or monitoring conversations and interference in the transmission of data or the disclosure of its existence or content. Sharing information with relevant authorities is only allowed if the legislation demands and/or requests comply with the requirements established by the applicable legislation in each of our operations. To ensure full alignment with local legislation, América Móvil has defined strict security procedures, as well as specific criteria for verifying the validity of every request received by the authority.

In 2021, América Móvil’s subsidiaries received 637,136 requests for information from our users by the authorities. In 92% of the cases, the information required by the competent authorities was provided, after verification of its adherence to the applicable local legislation. The remaining 8% was not processed because it did not come from the competent authorities or did not comply with the requirements established by law.

COUNTRIES / REGIONS (418-1)	ORDERS OF AUTHORITY RECEIVED <sup>1</sup>	ORDERS OF AUTHORITY PROCESSED <sup>2</sup>
Central America <sup>3</sup>	61,678	61,369
Southern Cone <sup>4</sup>	370,856	338,591
North America and Caribbean <sup>5</sup>	109,607	107,781
Andean Region <sup>6</sup>	94,995	76,480
Total	637,136	584,221



TO LEARN MORE ABOUT THE REGULATIONS THAT WE ARE SUBJECT TO IN EACH COUNTRY WHERE WE OPERATE REGARDING PRIVACY OF COMMUNICATIONS AND COLLABORATION WITH JUSTICE AUTHORITIES, [CLICK HERE](#).

<sup>1</sup> Those duly directed and entered by the official party and / or by electronic means (mail, tool, platform or system) to the Company.

<sup>2</sup> Those duly proceeding by virtue of the fact that they were: 1) founded and motivated; 2) came from the competent authority by law; 3) are supported by the corresponding judicial authorization, in accordance with the provisions of current legislation; and, 4) specify the person or persons who will be subject to the measure; the identification of the place or places where it will take place, if possible; the type of communication to be intervened; its duration; the process that will be carried out and the lines, numbers or devices that will be intervened and, where appropriate, the name of the concessionary company of the telecommunications service through which the communication object of the intervention is made.

<sup>3</sup> Costa Rica, El Salvador, Guatemala, Honduras, Nicaragua and Panama.

<sup>4</sup> Argentina, Brazil, Paraguay, and Uruguay.

<sup>5</sup> Telcel, Telmex, Claro Enterprise Solutions, Claro Puerto Rico and Claro Dominican Republic.

<sup>6</sup> Colombia, Chile, Ecuador and Peru.



## TAX PRINCIPLES & CONTRIBUTIONS

### TAX PRINCIPLES

(207-1)

We adhere unrestrictedly to our Code of Ethics and our policies including our Tax Policy and our Anti-Money Laundering Policy all of which are reviewed periodically; to the Conventions and International Treaties on tax matters, Anti-Corruption and Anti-Money Laundering; the Tax Code of the United States of America; the applicable financial reporting standards; and the applicable national and local legislation in each of the countries where we operate.

We are committed to avoid tax evasion, as well as to comply with tax obligations regardless of the country in which they are generated. Likewise, we refrain from using illegal benefits in countries classified as tax havens for tax planning purposes, as well as not to create companies in countries considered as tax havens.

If business operations justify the acquisition of a company that prior to the purchase had subsidiaries in countries classified as tax havens, the commitment is to liquidate or sell them in order to meet the intention of strict compliance with the tax regulations of the countries in which our commercial operations are carried out.

We seek to maintain a good relationship with the tax authorities, based on transparency and collaboration. Also, we avoid engaging in or maintaining relationships with companies that are related to tax evasion, money laundering and criminal financing activities.

América Móvil and its subsidiaries develop and maintain a transparent, traceable and truthful tax framework, complying with all tax requirements in an accurate and timely manner. América Móvil and its subsidiaries develop and maintain a transparent, traceable, and truthful tax framework, complying with all tax requirements in an accurate and timely manner. Following international best practices, Mexico as a member of the Organization for Economic Co-operation and Development (OECD), has incorporated into their local tax legislation the principles of this organism.

Our Tax Policy is publicly available and approved by our Chief Financial Officer. It outlines our tax commitments, including the following principles:

1. Our tax payments are made in the countries where we generate our income, and we make full disclosure of this in the Country-by-Country report that we present to the Mexican tax authorities.
2. We refrain from using tax havens for fiscal planning purposes.
3. We have procedures to guarantee the compliance of our fiscal duties to minimize any tax-related risks.
4. We have an adequate transfer pricing policy based on market prices and arm's length principle based on their economic value and contribution.
5. We report taxes paid in our public fillings in accordance to IFRS 3 and IAS 12 in note 13 of our 20-F report.

Additionally, our Anti-Money Laundering Policy has the following complementary Tax-related provisions:

1. Always behaving with truthfulness and transparency in the accounting books and records.
2. Prohibiting irregular operations to obtain an undue tax benefit.
3. Promoting business practices with companies that maintain a good reputation in tax matters, avoiding commercial relations with those of which we do not have sufficient and verified information, and not relating with companies whose bad reputation in tax matters, national or international, is known or should be known.
4. Performing and allowing internal or external audits to verify compliance with the applicable legal framework in tax matters.

To learn more about our Anti-Money Laundering Policy, or the rest of our policies and protocols, please send an email to:

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

### TAX CONTRIBUTION

(207-1, 207-4)

Tax residence for América Móvil is deemed in Mexico, so we are taxed 1) under our Mexican Income and 2) our worldwide income as it flows into Mexico, and we are subject to several other contributions as described in our Tax Policy. Additionally, we pay and collect various taxes from governments through its transactions with suppliers and customers, as well as through our own operations around the world.



TO LEARN MORE ABOUT OUR TAX POLICY, [CLICK HERE.](#)



FOR MORE INFORMATION REGARDING OUR TAX CONTRIBUTIONS GO TO [APPENDIX G.](#)





# SUPPLY CHAIN MANAGEMENT

(102-9, 204-1)

América Móvil bases its relationship with suppliers on a centralized strategic model to achieve economies of scale and synergies for our subsidiaries. Also, we have strategic suppliers in all countries to address local problems, particularly network maintenance, customer service platforms, and Call Centers.

One of the main priorities of our supply chain strategy is to identify any risk (legal, reputational, tax, financial, Etc.) within our suppliers based on joint responsibility because the success of the company depends on resilience within our value chain. Any potential supplier must complete a three-stage process within America Móvil's Third-Party Risk Management Strategy:

## 1) ENABLING:

To initiate and/or continue a business relationship with América Móvil, we must ensure that commercial partners comply with our principles, codes of ethics, quality standards, and just-in-time supply.

This year we strengthened our procedures by incorporating a Third-Party Due Diligence Protocol to identify risks derived from several factors that must

be known, analyzed, classified, and handled by the Company. The objective is to maintain commercial relationships only with Third Parties that share and implement in their operations and level of commercial execution, unrestricted compliance with the law, and the ethical principles that identify us.

This protocol allows us to protect the Company, shareholders, employees, and business partners by identifying and assessing risk in the performance of suppliers, distributors, or related Third Parties in general, before hiring or entering any relationship, such as the history of links to acts of corruption, fraud, bribery, money laundering, malpractice, sanctions, litigation, human rights violations, environmental impacts and links to other illegal actions. In this sense, we foster commercial ties based on ethical principles, which can generate long-term and mutual beneficial relationships.

In addition to the risk of non-compliance with América Móvil's Code of Ethics and Principles identified through the Due Diligence protocol, we identify the critical nature of the suppliers, based on the type of goods and services that will be sourced to the Company.



AS OF DECEMBER 31ST, 2021,  
WE HAD CONTRACTS WITH MORE THAN

**20**  
THOUSAND SUPPLIERS,  
AND MORE THAN 4 THOUSAND  
RETAILERS AROUND THE WORLD.

ALMOST

**70%**



OF BUSINESS PARTNERS  
SIGN OUR CODE OF ETHICS

WHILE 674 LATIN AMERICAN SUPPLIERS ENTERED  
OUR NEWLY ESTABLISHED THIRD-PARTY DUE  
DILIGENCE PROCESS.



## 2) PROCUREMENT AND CONTRACTING:

In this stage, we consider competitive pricing, commercial partners that meet sustainability criteria, and at the same time, provide added value that contributes to improving the user's experience and recommendation.

## 3) QUALITY AND PERFORMANCE:

We must ensure that the purchased goods and services will be delivered on time and with the required quality standards to meet the final user's satisfaction.

## 4) PROCUREMENT PROCESS INVITATION:

Once the suppliers are classified and certified, they can follow the bidding process.



AS PART OF OUR COMMITMENT TO CONTRIBUTE TO THE ECONOMIES OF THE COUNTRIES WHERE WE OPERATE, ON AVERAGE, MORE THAN

**80%**

OF OUR SUPPLIERS ARE LOCAL, AND IN SOME OPERATIONS THE PERCENTAGE EXCEEDS 90%.



WE CONTINUE OUR TRAINING AND OUTREACH EFFORTS TO DEVELOP LOCAL SUPPLIERS IN OUR VALUE CHAIN. BY YEAR-END 2021, WE WERE ABLE TO TRAIN MORE THAN

**13.7**

THOUSAND LOCAL BUSINESS PARTNERS IN LATIN AMERICA IN OUR CODE OF ETHICS, AND 3.5 THOUSAND IN ANTI-CORRUPTION THROUGH OUR ONLINE TRAINING PLATFORM, *CAPACÍDATE ALIADOS*.



This year, while establishing our 2030/2050 targets, we extended our 2020 goals. By 2021 our goal was to align 70% of our suppliers with our Supplier Code, achieving 69.9% by the end of the year. Our second goal was to provide sustainability training to 30% of our local suppliers. Almost 40% of our local suppliers have received training through our Allies Training Platform. Finally, we aimed to close the year with 100% of our Tier 1<sup>1</sup> suppliers evaluated in sustainability, completing 70% by December 2021.

Our updated supply chain management goals were established as follows:

- 14% reduction of scope 3 GHG emissions by 2030.
- Zero tolerance for human rights violations within the Company and the supply chain.
- Zero tolerance for corrupt practices within the Company and the supply chain.
- 100% of our active business partners evaluated in 2025.
- 100% of our active business partners trained in our Code of Ethics, Anticorruption Practices and at least 50% trained in environmental footprint by 2025.

During our 2021 Sustainability Week, we presented our subsidiaries with the new Third Party Due Diligence Protocol and best practices on Supply Chain Risk Management, along with the new set of supply chain management targets. At least one representative from sustainability, procurement and compliance in each subsidiary participated in this event.



FOR MORE INFORMATION REGARDING RISK MANAGEMENT, GO TO [APPENDIX B](#).

<sup>1</sup> Only the total Tier 1 suppliers whose annual purchase orders exceeded 50 million dollars are being considered.



# CUSTOMER VALUE MANAGEMENT

Our Company has a customer-centered strategy. We seek to excel in customer experience improved by constant innovation, digitalization, and through omni-channel customer care.

## CUSTOMER EXPERIENCE

Our customer experience strategy is based on a cultural change to achieve the transformation that spreads across the organization by promoting multi-disciplinary teams that work in an efficient. The entire organization is involved in customer dialogue by continuously measuring key customer experience metrics established at all levels.

Since 2018, we have collaborated in a regional and local governance model, with customer experience guidelines and customer experience awards, aiming to increase Net Promoter Score, generate cost reduction, reduce voluntary churn<sup>1</sup>:

1. Digitization focused to increase sales through digital channels, self-service, reduction of paper usage and in-store experience.
2. Streamlining through process redesign, commercial offer improvement, and a clear language for the user.
3. Omni channel, enabling a flexible and seamless shopping experience across all contact channels by ensuring consistency in communication.
4. Data analytics and artificial intelligence, seeking personalization, empowering virtual assistants, and making an efficient development of use cases; and,
5. Voice of the customer through continuous voice-of-customer monitoring and redesign of the customer journey, using design thinking methodology.

<sup>1</sup> Disconnection Rate. The ratio of wireless subscribers disconnected during a given period to the number of wireless subscribers at the beginning of that period.

TODAY, MORE THAN

91%



OF TRANSACTIONS ARE CARRIED OUT THROUGH SELF-MANAGEMENT CHANNELS BY ADDRESSING THE TREND IN CONSUMER BEHAVIOR TOWARDS SELF-SERVICE, WHILE LESS THAN 16% ARE CARRIED OUT THROUGH ASSISTED SERVICE CHANNELS, INCLUDING OUR CUSTOMER SERVICE CENTERS, CUSTOMER SERVICE AND OUR CALL CENTER.

The customer experience should include:

- **VALUABLE EXPERIENCES:** Covering every detail to create unique, efficient, and straightforward experiences that prioritize customers.
- **CLEAR AND HUMAN COMMUNICATION:** Maintaining timely and complete communication in all contact channels by being understanding and courteous.
- **TRANSPARENT AND RELIABLE SERVICE:** Delivering promised services and solutions being responsible for customer satisfaction.
- **FLEXIBILITY AND EMPOWERMENT:** Providing customers with services according to their needs.





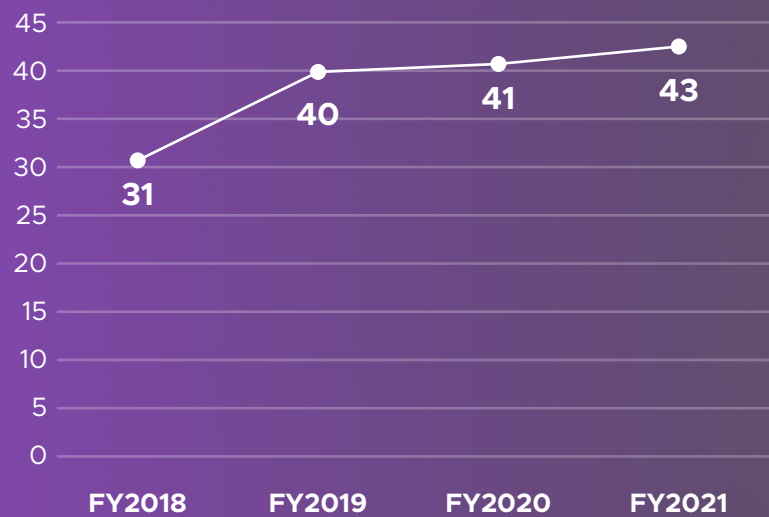


Considering that all markets are different and that many of the strategies to better address customers are local, we established an aligned metric to measure customer satisfaction between countries' operations that could help us identify the effectiveness of the strategies that every subsidiary carries out. This metric is the Net Promoter Score (NPS) indicator. By focusing on customers and analyzing their behavior, the NPS allows us to identify the origin of what is not working and prevent bad experiences from occurring or solving problems beforehand.

To evaluate the Net Promoter Score, in 2021, we carried out close to 180 million surveys in our operations, which allowed us to better understand if the user experience was in line with their expectations. Additionally, we have a plan to measure how the use of applications and their interaction with our channels positively affect customer loyalty.

To measure NPS, we asked our customers how likely they would recommend our service based on their own experience. The indicator calculation is based on subtracting the number of those who would not recommend our service from the number of those who would.

At year-end 2021, the Net Promotor Score for América Móvil was 43 points, representing a positive increase of 2 points compared with the previous year and 3 points compared with 2019.



Given that we have been able to continuously increase the Net Promoter Score, we decided to set a more ambitious objective, which consists of exceeding the mobile and fixed NPS of our competitors and increasing the gap. In order to achieve this, we continue our efforts to offer a more complete customer experience focused on their needs and expectations.

The following are some examples of the positive responses we received compared with our local competitors in some of our operations:

COUNTRY	NPS OF CLARO/ TELCEL BRAND	NPS MOBILE CLARO/TELCEL	NPS LEADING COMPETITOR IN MOBILE PRODUCTS	NPS FIXED CLARO/TELCEL	NPS LEADING COMPETITOR IN FIXED PRODUCTS
Chile	51	50	25	50	38
Dominican Republic	33	29	29	29	11
Argentina	42	42	28	42	28
Mexico / Telcel	56	56	44	NA	NA





## DIGITAL CHANNELS

América Móvil focuses on our clients to have a complete and satisfactory experience in a digital environment by constantly monitoring our commercial websites and creating solutions to manage them. We are also introducing innovative digital customer service processes that help us improve and simplify the lives of our subscribers.

Our main objective is to include the implementation of functional web architectures, the digitization and automation of processes focused on the needs of consumers, the generation of savings for the entire Company, and innovation in digital solutions.

Through our digital channels, today our clients can: see our entire catalog of products and services, compare plans and prices, purchase plans and equipment, monitor their consumption levels, express their level of satisfaction, pay bills, increase credit on their prepaid lines, answer their questions in our frequently asked questions section or through our chat bot and chat with our advisors.

In response to the digital era, all of América Móvil's service tools are geared towards creating a simpler and more efficient experience for our customers. Consequently, 100% of our operations have a website, app, Facebook, Twitter, and Instagram.



# INNOVATION

We constantly seek to expand our offer of value-added services and digital products to provide solutions that improve the lives of our users. In innovation, we see the possibility of identifying new revenue sources, improving efficiency in our operations, and contributing to reducing society's environmental footprint.

## OPEN INNOVATION

Our Digital Innovation Center in Mexico emerges as a mediator between the Company and possible technological partners and startups, in addition to providing trend analysis and market intelligence to our operations.

Also, our main operations in the European, Colombian, and Brazilian markets lead open innovation efforts, generating alliances between the company and diverse players in the digital ecosystem for the development of new technologies, products, services, and business models. The innovation strategy has been focused on 3 pillars:

### COLLABORATING WITH STARTUPS

Facilitating the integration of external innovation in the organization through collaboration with startups, innovation centers, universities, or research centers.



### EXPANDING THE PORTFOLIO OF DIGITAL PRODUCTS AND SERVICES

Developing alliances with companies around the world to enhance our product portfolio and adopt a data-driven business development approach.



### FINANCING

Promoting internal Entrepreneurship and identifying fiscal incentives and financial support to explore new paths for business development.





## PRODUCT INNOVATION

Telecommunications and infrastructure service requirements are evolving as new use cases emerge and more industries implement Internet of Things (IoT) technologies. In the past, M2M (machine-to-machine) solutions simply used a SIM card in a mobile phone adapted to transmit sensor data through Short Message Service (SMS). This has changed dramatically since then. Today, IoT devices are designed according to their purpose and manufactured in millions through complex logistics processes and global supply chains.

Today, thanks to the applications of Internet of Things (IoT), the transmission of data in real time through remote sensors contributes to proactive decision making in practically all industries ranging from transportation, manufacturing, agriculture, and healthcare to cities, buildings, smart energy, and services.

At América Móvil, the number of connections for Internet of Things (IoT) devices, as well as machine-to-machine (M2M) communications grows more than 30% each year.

Climate change and greenhouse gas emissions have become the greatest challenge of our times. While at América Móvil we cooperate indoors as individuals and as a company, we also have the potential to enable millions of clients in all industries to achieve more efficient and sustainable operations using innovative information technologies.

**TO LEARN MORE ABOUT SOME OF THE SUCCESS STORIES REGARDING IOT (INTERNET OF THINGS) APPLICATIONS, VISIT OUR WEBSITE**  
[WWW.AMERICAMOVIL.COM/SUSTAINABILITY](http://WWW.AMERICAMOVIL.COM/SUSTAINABILITY)



## PROCESS INNOVATION

Five years ago, América Móvil created a Transformation Office with similar local organizational structures to develop and share optimization projects across operations. We developed a management system called FRIDA to facilitate the follow-up and best practice sharing.

Since 2017, 2,438 initiatives have been managed in all our Latin American operations, representing over 1.4 billion dollars in cost reductions and efficiencies.

Last year, we registered 200 million dollars in savings from opportunities gained during the pandemic, as well as from ongoing initiatives across work fronts.

## AGILE METHODOLOGY

In order to keep up with the continuous changes in the market, we are incorporating the Agile Methodology in some of our work processes and teams, which allows us to be more efficient in developing new products and services, including the following benefits:

- Maintaining visibility from work throughout the implementation;
- Reducing uncertainty in product development services;
- Improving communication between business units;
- Allowing the company to adapt to market opportunities;
- Enabling improvements in development;
- Fostering greater flexibility and competitiveness.

## INNOVATION AWARDS

In addition, some of our operations have introduced the Innovation Awards, through which our employees submit cost reduction, revenue increase or process improvement projects that are analyzed by multidisciplinary judges including internal members and Third-Party experts in innovation.

WITHIN THE DIFFERENT SEGMENTS,  
NETWORK AND ENERGY INCLUDES

**371**

**PROJECTS ACCOUNTING FOR 240  
MILLION DOLLARS IN REDUCTIONS.**



# CONTINUOUS IMPROVEMENT AND CERTIFICATIONS

At América Móvil we offer constant training focused on the implementation of continuous improvement processes and mechanisms.

Among our certifications we can mention SCRUM Master, different ISO certifications, Lean Six Sigma, Java and Oracle Certifications and Agile Certified Practitioner.



TO LEARN MORE ABOUT THE CERTIFICATIONS THAT WE HAVE ACCOMPLISHED, VISIT [APPENDIX I](#) OF THIS DOCUMENT.







# APPENDIXES

## INFORMATION AND CONTACT

(102-53)

If you would like to share your opinions of the content of this report, please contact us through any of the following channels:

**E-mail:** [contacto-rse@americamovil.com](mailto:contacto-rse@americamovil.com)

**Phone number:** +52 (55) 2581 3700 ext. 1097

**Website:** <http://www.americamovil.com>



# APPENDIX A: MATERIALITY AND STAKEHOLDER ENGAGEMENT

## MATERIALITY

(102-21, 102-29, 102-31, 102-47)

The COVID-19 pandemic triggered significant changes in all aspects of the daily life around the world, that is why instead of launching our materiality analysis in the 2020 pandemic period we, decided to carry it out until year-end 2021.

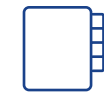
The study, as the one held in 2017, was aligned to the 10 Principles of UN Global Compact, 2030 UN Sustainable Development Goals, and followed several methodologies including ISO 26000, SA8000, and GRI Standards. In order to reflect the post-pandemic re-prioritization, this year we also aligned the study to UN Post-Covid priorities and recent investor concerns.

As part of our materiality analysis poll, we had the participation of more than 34 thousand people from across our stakeholders' universe in the region, including: employees, directors, investors, board members, customers, corporate clients, retailers, suppliers, press, NGOs, academy, business associations, and authorities.

## POLL PARTICIPATION MAP







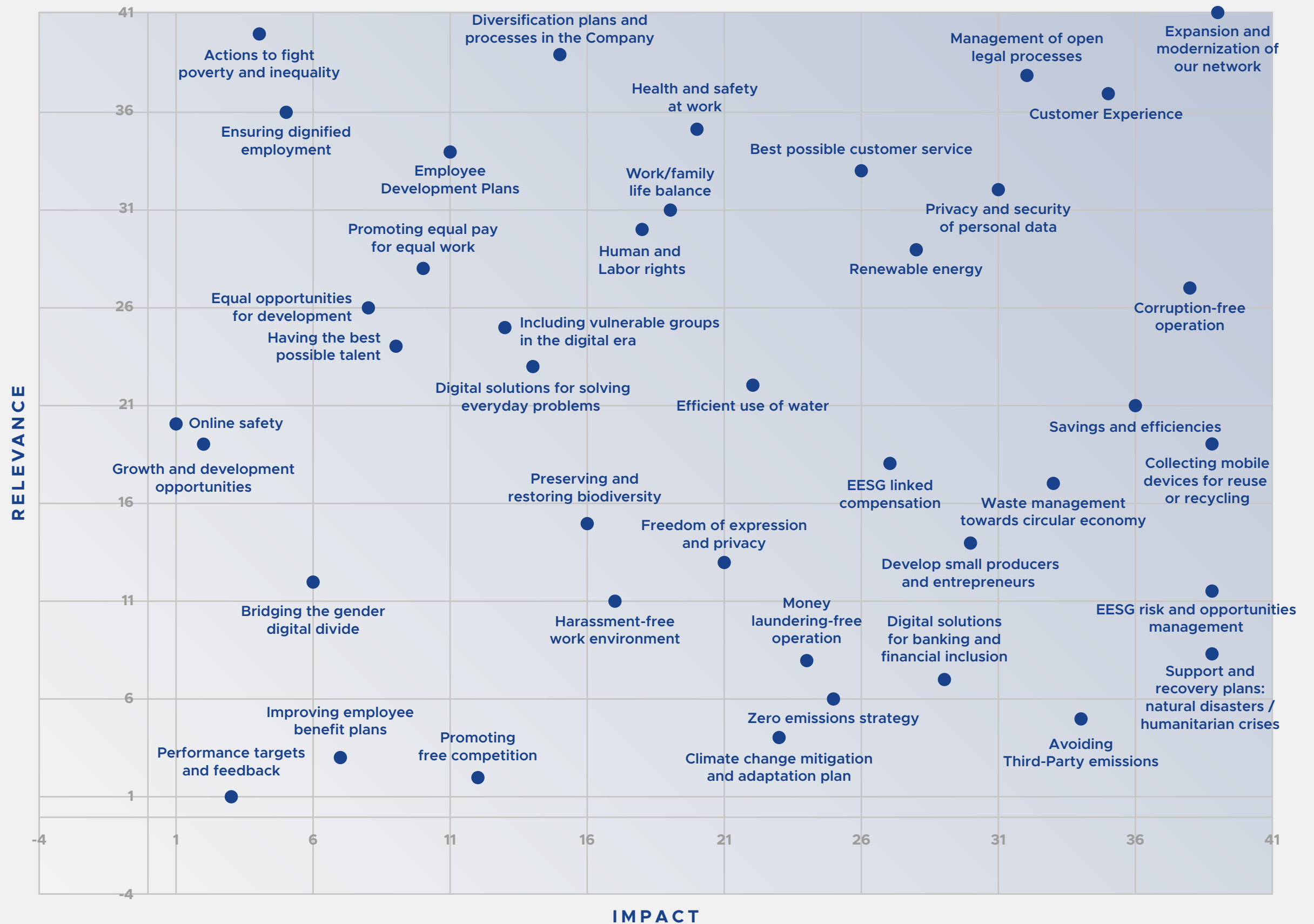
## MATERIALITY MATRIX

According to the materiality analysis the top material issues are:

- To continue investing in the expansion and modernization of our network, increasing coverage to provide Internet and digital services to a greater number of people.
- To have any open legal process handled and establish processes to avoid their recurrence.
- To improve the experience of our users in connectivity, availability and the offering of products and services.
- To guarantee the privacy and security of clients, employees, etc. personal data of
- To guarantee a corruption-free operation.

While The secondary material issues are:

- Ensuring health and safety at work.
- Guaranteeing the best possible customer service through all our channels, on site or virtual, whether they are our own, from distributors or from commercial chains.
- Investing in renewable energy.
- Ensuring significant savings every year through continuous improvement projects.
- Managing the efficient use of water.





- And the least material but, still important for the Company are:
- Having diversification plans and processes in the Company.
  - Having development plans that prepare employees for continued growth, even outside the company.
  - Promoting the emotional stability of employees and work/family life balance.
  - Having zero-tolerance for any deviation or any violation of human and/ or labor rights.
  - Managing and minimizing the waste generated towards a circular economy.
  - Creating programs along with partners to collect mobile and/or electronic devices for reuse or recycling.
  - Having compensation linked to business, environmental, social, and corporate governance performance indicators.
  - Developing small producers and entrepreneurs within the company’s value chain.
  - Minimizing risks and capitalizing on social, environmental, and economic opportunities.
  - Establishing support and recovery plans for the society, in the face of natural disasters and humanitarian crises.

Compared with the 2017 materiality matrix, we observed an increase in the impact of several topics for the Company such as: the efforts to minimize our emissions, having the best customer service, modernizing infrastructure and avoiding Third-Party emissions; while there was a decrease in the impact for the Company on topics such as connectivity and ethical use of technologies.

Also, we identified a significant increase in the relevance that our stakeholders gave to certain topics such as: occupational health and safety, as well as information security and privacy; while there was a significant decrease in the importance, they gave to other topics such as: waste management, natural disaster aid plans, the preservation and restoration of biodiversity and avoiding Third-Party emissions.

Finally, some issues raised by the Corporate Sustainability Executive Committee, which in the materiality analysis were considered as new relevant issues to manage are: the promotion of emotional stability of employees and work/family life balance; circular economy; the creation of programs along with partners to collect mobile and/or electronic devices for reuse or recycling; and EESG linked compensation.

## RELATIONSHIP WITH STAKEHOLDERS

(102-40, 102-42, 102-43, 102-44)

We have identified nine América Móvil stakeholders with whom we maintain constant communication. To guarantee such communication, we have established several contact channels.

In 2021, we evolved our Stakeholder Engagement Guidelines to align the activities of our subsidiaries, thus reducing risks and strengthening our social license to operate.

These guidelines are a tool that allows those responsible for the institutional relations and liaison duties within América Móvil and its subsidiaries, to locally know, plan, implement and evaluate the policies and procedures regarding how to manage, coordinate, supervise and/or advise about the relationship with América Móvil and its subsidiaries.

The objective of the institutional relationship of América Móvil and its subsidiaries is to establish and ensure constructive relationships in the long-term with key players to fulfill the Company’s goals, the promotion of sustainability in the activities we carry out and the quality of the services we provide to our clients.

All activities carried out to achieve this objective are governed by local applicable regulations and by América Móvil’s Code of Ethics.



STAKEHOLDER	CHANNELS OF COMMUNICATION	FREQUENCY	MAIN EXPECTATIONS	ISSUES DISCUSSED DURING 2021	INITIATIVES TO ADDRESS ISSUES AND EXPECTATIONS
CLIENTS	<ul style="list-style-type: none"><li>Social media</li><li>Market research</li><li>Service in stores</li><li>Telephone support / Call Center</li><li>Internet portal / Online Stores</li><li>Chat/Chatbot</li><li>Apps in mobile devices</li><li>Self-Service Modules</li><li>Suggestions mailbox</li><li>Email</li><li>Blogs</li><li>Whistleblower portal</li><li>Sustainability Report</li></ul>	Continuous / Annual	<ul style="list-style-type: none"><li>Great customer experience / service quality</li><li>Follow- up of complaints and/or suggestions</li><li>Coverage and connectivity</li><li>Competitive prices</li><li>Questions answered</li><li>Acquiring new packages or services</li></ul>	<ul style="list-style-type: none"><li>Unsolicited advertising calls/messages</li><li>Data service failures (poor experience)</li><li>Voice service failures (dropped calls)</li><li>Additional charges</li><li>Non-consensual portability</li></ul>	<ul style="list-style-type: none"><li>Addressing complaints in a positive and timely manner</li><li>Proper use of black lists and filtering tools</li><li>Responsible marketing practices</li><li>Ensuring clear information available to the user</li><li>Ensuring that the current contract is available</li><li>Materiality assessment</li></ul>
MEDIA	<ul style="list-style-type: none"><li>Corporate Communications</li><li>Telephone support</li><li>Email</li><li>Press room</li><li>Events</li><li>Virtual and in-person meetings</li><li>Whistleblower portal</li><li>Sustainability Report</li></ul>	Continuous / Quarterly / Annual	<ul style="list-style-type: none"><li>Transparency and accountability</li><li>Timely information</li><li>Advertising sales</li></ul>	<ul style="list-style-type: none"><li>Diversification of advertising from print to digital media</li><li>AMX Tower Spin-off</li><li>Professional Video Games League</li><li>5G Future Forum Invitation for New Members</li><li>Annual Report</li><li>Claro-Telxius Submarine Cable</li><li>AMX-Liberty Latin America Alliance in Chile</li><li>Agreement to sell Claro Panama to Cable and Wireless</li><li>Tokyo 2020 Olympic and Paralympic Olympics Games</li><li>Completion of Tracfone sale to Verizon</li><li>Claro 360 and Intel Alliance</li><li>Launch of new satellite for Latin America</li><li>Alliance with Red Bull Racing</li><li>Alliance with ABB FIA Formula E World Championship</li><li>Buyback fund and new female directors appointed</li></ul>	<ul style="list-style-type: none"><li>Press releases</li><li>Answered requests of information regarding:<ul style="list-style-type: none"><li>New Android TV Decoder similar to Claro Box TV from - TAVI Latam, Colombia.</li><li>Submarine cable</li><li>América Móvil’s History</li></ul></li><li>Collaboration agreements to maintain advertising due to budget cuts and economic recovery</li><li>Materiality assessment</li></ul>
INVESTORS	<ul style="list-style-type: none"><li>Events and presentations</li><li>Quarterly results conferences</li><li>Financial and operating reports</li><li>Internet website</li><li>Email</li><li>Telephone support</li><li>Virtual and in-person meetings</li><li>Whistleblower portal</li><li>Sustainability Report</li></ul>	Continuous / Quarterly / Annual	<ul style="list-style-type: none"><li>Transparency and accountability</li><li>Timely information</li><li>Cost effectiveness</li></ul>	<ul style="list-style-type: none"><li>Financial and operational performance</li><li>Sustainability targets and evaluations</li><li>Risks and regulations</li><li>Market competition</li><li>Towers Spin-off</li><li>CAPEX</li><li>5G implementation</li><li>Divestitures, Mergers and Acquisitions</li><li>Dividends and share buybacks</li><li>Corporate governance practices</li><li>Climate Change Strategy</li><li>Privacy and Cybersecurity Practices</li><li>Infrastructure</li><li>Convergence</li><li>Strategy in specific markets</li></ul>	<ul style="list-style-type: none"><li>Investor Day Conference</li><li>In presence and virtual meetings and calls</li><li>Follow-up meetings with responsible divisions</li><li>Follow-up calls with rating agencies</li><li>EESG website and reestructuring reports.</li><li>Materiality assessment</li></ul>





STAKEHOLDER	CHANNELS OF COMMUNICATION	FREQUENCY	MAIN EXPECTATIONS	ISSUES DISCUSSED DURING 2021	INITIATIVES TO ADDRESS ISSUES AND EXPECTATIONS
SUPPLIERS	<ul style="list-style-type: none"><li>Telephone support</li><li>Events</li><li>Virtual and in-person meetings</li><li>Whistleblower portal</li><li>Sustainability Report</li><li>Commercial Integrity Policy</li><li>Partner training portal</li></ul>	Continuous / Annual	<ul style="list-style-type: none"><li>Transparency and accountability</li><li>Health and safety</li><li>Timely payment</li><li>Vendor development</li></ul>	<ul style="list-style-type: none"><li>Semiconductor and other components shortages</li><li>Semiconductor and other components shortages</li><li>Changes in logistics and pricing</li><li>Necessary supply in a timely manner</li><li>Third Party Due Dilligence Protocol</li><li>Disolution of low-end devices suppliers</li><li>Delivery guarantees</li><li>Tier 2 Critical Suppliers</li></ul>	<ul style="list-style-type: none"><li>Anticipating orders</li><li>Committing to buy specific volumes of products</li><li>Constant monitoring to ensure availability</li><li>Negotiations to avoid extra costs</li><li>Increased planning and close management with supply chain to ensure product availability</li><li>Strengthening of our reverse logistics program</li><li>Conversations with critical Tier 2 suppliers</li><li>Central Procurement Project to manage inventories.</li><li>Pilot Project of Third Party Due Dilligence Protocol</li><li>Materiality Assessment</li></ul>
EMPLOYEES	<ul style="list-style-type: none"><li>Email</li><li>Telephone support</li><li>Virtual and in- person meetings</li><li>Internal magazine</li><li>Manuals and training</li><li>Internal Communications and Intranet</li><li>Work Environment Survey</li><li>Performance feedback</li><li>Unions</li><li>Whistleblower portal</li><li>Sustainability Report</li></ul>	Continuous / Monthly / Annual	<ul style="list-style-type: none"><li>Respect for human and labor rights</li><li>Health and safety</li><li>Growth and development</li><li>Salaries and benefits</li><li>Training and growth</li><li>Transparency and accountability</li></ul>	<ul style="list-style-type: none"><li>Speeding up internal processes</li><li>Opportunities in innovation and creativity</li><li>Emotional stability and work/life balance</li><li>Development opportunities and plans</li><li>Health and safety certifications</li><li>Salary increase</li><li>Compensation linked to ESG performance</li><li>Human Rights and Labor Rights</li></ul>	<ul style="list-style-type: none"><li>Sustainability Week</li><li>Company Purpose, Vision, Values and Behaviours</li><li>Meetings with all divisions to address concerns from Work Environment Survey</li><li>Negotiations with unions regarding employee benefits</li><li>Webinars on psychosocial risks for employees</li><li>Social wellbeing programs for employees and families</li><li>Technical training and skills deveopment workshops</li><li>Corporate Health and Safety Policy and training</li><li>Diagnosis on sexual and workplace harrassment</li><li>Diagnosis on diversity and inclusion</li><li>Materiality Assessment</li></ul>
RETAILERS	<ul style="list-style-type: none"><li>Events</li><li>Virtual and in-person meetings</li><li>Email</li><li>Telephone support</li><li>Specialized journals</li><li>Manuals and training</li><li>Advertising</li><li>Satisfaction surveys</li><li>Whistleblower portal</li><li>Commercial Integrity Policy</li><li>Sustainability Report</li></ul>	Continuous / Monthly / Annual	<ul style="list-style-type: none"><li>Commercial benefits</li><li>Training and growth</li><li>Transparency and accountability</li><li>Timely payment</li><li>Health and safety</li></ul>	<ul style="list-style-type: none"><li>Changes in the billing system</li><li>Handset shortages</li><li>COVID's impact in the market</li><li>Special offers and market opportunities</li><li>Targets and strategy</li><li>Product sales</li><li>COVID protocols</li><li>Point of sale image</li><li>Paperless campaign</li><li>E-commerce</li><li>Commissions on sales</li></ul>	<ul style="list-style-type: none"><li>Developing manuals of the new billing system</li><li>Training and daily assistance in the operation</li><li>Workshops and planning meetings</li><li>Follow-up of handsets requests / alternatives</li><li>Provision of technical data sheets.</li><li>Annual distributors' conference.</li><li>Speeding up internal processes</li><li>Contingency support plans</li><li>Clarification on commission scheme</li><li>Training on prepaid/pospaid offers</li><li>Effective use of marketing funds</li><li>Point of sale feedback</li></ul>





STAKEHOLDER	CHANNELS OF COMMUNICATION	FREQUENCY	MAIN EXPECTATIONS	ISSUES DISCUSSED DURING 2021	INITIATIVES TO ADDRESS ISSUES AND EXPECTATIONS
<b>PARTICIPATION IN INDUSTRY ASSOCIATIONS</b>	<ul style="list-style-type: none"><li>Virtual and in-person meetings</li><li>Special events</li><li>Information shared by the sector</li><li>Whistleblower portal</li><li>Sustainability Report</li></ul>	Monthly / Annual	<ul style="list-style-type: none"><li>Transparency and accountability</li><li>Timely information</li><li>Sharing of best practices</li></ul>	<ul style="list-style-type: none"><li>Human Rights assessment for the industry</li><li>Climate Action</li><li>Circular Economy</li><li>Scope 3 Emissions</li><li>Impact of Telecom Services on SDGs</li><li>Industry Materiality Post-COVID</li><li>Industry sustainability KPIs</li><li>Industry Standards and Regulation</li></ul>	<ul style="list-style-type: none"><li>Active participation in Industry working groups</li><li>Feedback to Industry White Papers/ initiatives</li><li>Calls and interviews with specialists</li><li>Co-Founding 5G Future Form</li><li>Hosting the GSMA Mobile 360 Latin America</li><li>Materiality Assessment</li></ul>
<b>AUTHORITIES</b>	<ul style="list-style-type: none"><li>Alliances</li><li>Agreements</li><li>Virtual and in-person meetings</li><li>Information requirements</li><li>Audits</li><li>Telephone support</li><li>Email</li><li>Whistleblower portal</li><li>Sustainability Report</li></ul>	Monthly / Annual / Unexpected inspections	<ul style="list-style-type: none"><li>Coverage and connectivity</li><li>Support and collaboration during disasters</li><li>Compliance with laws and regulations</li><li>Tax and contributions management</li><li>Investment and job creation</li></ul>	<ul style="list-style-type: none"><li>Radio spectrum management policies</li><li>5G spectrum allocation</li><li>6GHz band for 5G implementation</li><li>Digital infrastructure expansion</li><li>Service quality</li></ul>	<ul style="list-style-type: none"><li>Materiality Assessment</li></ul>
<b>COMMUNITY</b>	<ul style="list-style-type: none"><li>Corporate citizenship programs/ events</li><li>Virtual and in-person meetings</li><li>Telephone support</li><li>Email</li><li>Whistleblower portal</li><li>Sustainability Report</li></ul>	Continuous / Monthly / Annual	<ul style="list-style-type: none"><li>Coverage and connectivity</li><li>Investing in social/economic development programs</li><li>Good neighbor</li><li>Caring for environment and biodiversity</li></ul>	<ul style="list-style-type: none"><li>Coverage and connectivity</li><li>Digital divide</li><li>Education</li><li>Health</li><li>Culture</li><li>Environmental care</li><li>Emergency Response</li><li>Network reliability</li></ul>	<ul style="list-style-type: none"><li>Expansion of LTE coverage</li><li>Digital divide programs</li><li>Digital education platforms and scholarships</li><li>Courses on digital skills</li><li>Business Continuity and Business Recovery Plans</li><li>Continuous Investment in infrastructure and capacity</li><li>Climate Change commitments</li><li>Environmental protection programs</li><li>ASUME program</li><li>Culture and Sports sponsorships</li><li>Health prevention programs</li><li>Materiality Assessment</li></ul>

# APPENDIX B: RISK MANAGEMENT

(102-15, 201-2)

The following is a list of the most relevant identified risks and are in no particular order.

## NATURAL DISASTERS, EXTREME WEATHER AND OTHER CATASTROPHIC EVENTS SUCH AS WAR, TERRORISM, OTHER ACTS OF VIOLENCE OR ILLNESS

Our operations could experience damages as a result of unexpected events such as wars, acts of terrorism, conflicts at the international, domestic or regional level (including labor conflicts), embargoes, problems related to public health (including contamination, adulteration or food or water shortages, the outbreak of diseases caused by the above or the spread of diseases or pandemics including COVID-19, Ebola, Avian Influenza, H1N1 influenza or Middle East Respiratory Syndrome, and natural disasters (including earthquakes, tsunamis, hurricanes or other adverse climate or environmental conditions) in the countries where we are present. These events could affect our ability to perform our tasks and could affect our ability to continue operating without interruption, which in turn could have an adverse impact on our activities and results of operations.

## PUBLIC HEALTH CRISES IMPACT, INCLUDING THE COVID-19 PANDEMIC, ON THE GLOBAL ECONOMY AND OUR OPERATIONS

We may be subject to risks related to public health crises, such as the COVID-19 pandemic, which had an adverse effect on our operating results in 2020. Our business is based on our ability to provide products and services to customers in all the countries where we operate, and the ability of those customers to use and pay for those products and services for their business and in their daily lives. As a result, our business, financial condition and results of the operations could be materially affected by a crisis like the COVID-19 pandemic that significantly impacted the way customers use and pay for our products and services, the way our employees are able to provide services for our customers, and the ways that our partners and suppliers are able to provide products and services to us. For example, public and private sector policies and initiatives to reduce the transmission of COVID-19, including the initiatives we took in response to the health crisis to promote the health and safety of our employees and provide critical infrastructure and connectivity to our customers, along with the related global slowdown in economic activity, contributed to decreased net profit for the year and lower earnings per share during 2020.

In addition, such a crisis could significantly increase the probability or consequences of the risks our business faces in ordinary circumstances, such as risks associated with our supplier and vendor relationships, risks of an economic slowdown, regulatory risks, and the costs and availability of financing. Because the severity, magnitude and duration of the COVID-19 pandemic and its economic consequences are uncertain and rapidly changing, the impact on our business, financial condition and results of operations in 2022 and beyond remains uncertain and difficult to predict. In addition, the ultimate impact of the COVID-19 pandemic on our business, financial condition and results of operations depends on many factors, including those discussed above, that are not within our control.

## EXPECTATIONS OF OUR STAKEHOLDERS REGARDING ESG PRACTICES

Investors and other stakeholders are increasingly aware of the environmental, social and corporate governance practices of companies in all industries. If we are unable to adapt to or meet the changing expectations of these groups, or if these groups perceive that we have not responded adequately to the growing concern about environmental, social and corporate governance practices (regardless of whether or not there is a legal obligation to do so), our reputation could be damaged and our activities, our financial condition or the price of our shares could be significantly affected. If we fail to meet the expectations of our several stakeholders, respond appropriately to them, or achieve significant sustainability goals, the trust in our brands could decrease and our activities or our ability to access financing sources of could be affected.

Therefore, the Sustainability Strategy is led by the Executive Sustainability Committee which has standardized and aligned best practices and criteria to improve our reports.



## STRONG COMPETITION IN THE TELECOMMUNICATIONS SECTOR

We are currently facing strong competition and it is expected that this will increase in the future as a result of the appearance new operators, the development of new technologies, products and services and convergence. In addition, the telecommunications sector is expected to consolidate in response to the need for operators to reduce costs and obtain additional radio spectrum. This trend could result in the surge of larger operators with greater financial, technical, promotional and other resources competing with us. Among others, our competitors could:

- grant higher subsidies for the purchase of mobile phones;
- pay higher commissions to their distributors;
- offer airtime or other services (such as Internet access) for free;
- offer services at lower prices through double-play, triple-play, quadruple-play service packages and other similar pricing strategies;
- expand their networks with higher speeds; or
- develop and deploy new and better technologies and more speed, including 5G LTE technology.

Competition could lead us to increase our advertising and promotional expenses, as well as reduce the prices of our services and mobile devices. This could cause a decrease in our operating margins, generate a greater number of options for users and increase the migration of clients between different competitors, which in turn could make it difficult for us to retain our current clients or attract new ones. The costs related to attracting new clients could also continue to increase, which could cause a decrease in our profitability even as the number of clients continues to grow.

Our ability to compete successfully will depend on our level of coverage; the quality of our network and our services, our rates; the quality of our customer service; the implementation of effective marketing initiatives; the success in the sale of the double-play, triple-play and quadruple-play service packages. Also, it will depend on our ability to predict and react to the different factors that affect competition in the telecommunications sector, including the availability of new services and technologies, changes in consumer preferences, demographic trends, economic conditions and the price discount strategies of our competitors.

If we are unable to attract new clients, increase the levels of use of our services and introduce new services to counteract any price reduction and respond to competition, our revenues and profitability could decrease.

América Móvil's priority has always been cost reduction and operational efficiencies, as well as continued investment in infrastructure and capacity in order to ensure our leadership in the market, driven by

high-quality services, solutions, and competitive prices. In addition, we continue to work to improve our customers' experience to maintain and increase brand preference.

## OBJECTIVES AND SERVICE QUALITY STANDARDS

The terms of the concessions of our subsidiaries establish certain objectives in terms of service quality, including, for example, minimum percentages of completed calls, maximum percentages of circuit occupancy, availability of operators and response to repair requests.

In the past, failure to meet service quality obligations has led to significant fines from regulatory authorities. That is why at América Móvil we constantly invest in the modernization of our networks and the expansion of their capacity in order to provide our clients with the best possible quality of service. However, our ability to meet the applicable quality of service requirements in the future could be affected by factors beyond our control and therefore, we cannot guarantee that we will be able to meet these requirements.

## CHANGES IN THE REGULATORY ENVIRONMENT

Our operations are subject to considerable government regulation and may be adversely affected by legislative and regulatory reforms, as well as changes in regulatory policies. Concession titles and construction, operation, sale, resale and interconnection contracts required by telecommunications systems in Latin America and other countries are regulated in different ways by government or regulatory authorities. Any of the authorities that have jurisdiction over the Company's operations could adopt or declare new provisions or reforms or adopt measures that could adversely affect us. Both, the regulation of rates that operators can charge for their services, as well as the environmental regulation (including those related to renewable energy sources and climate change), could have a significant adverse effect on our profit margins.

In addition, changes in government administration could lead to new regulation and the adoption of policies that could affect our operations, including regulation and tax policies as well as competition policies applicable to communications services. We cannot predict how the modification of existing measures, or the imposition of new regulatory measures will affect the results of operations. Similarly, in other countries we could face policies such as the existence of preferences so that the ownership of concessions and assets related to the provision of communications services remains in the hands of domestic and not foreign investors, or in the hands of the government, and not from the private sector, which could prevent us from continuing to develop our activities or harm their development, generating loss of revenues and forcing capital investments, which could have a significant adverse effect on our activities and results of operations.

## REGULATION ON DOMINANT OPERATORS

The authorities that regulate us are entitled to impose specific measures, among others, in terms of rates (including termination and interconnection rates), quality of service, access to active or passive infrastructure and provision of information to any operator that in the opinion of such authorities exercises substantial power in a relevant market.

Thus, we cannot predict the measures that the authorities would adopt if they were to determine that América Móvil exercises substantial power in the markets of the countries in which it operates. However, the issuance of unfavorable determinations for our subsidiaries could lead to significant restrictions on these operations. Also, we could be subject to additional regulatory restrictions and increased scrutiny for providing integrated services.

If in the future our activities are subject to specific measures because of the regulations applicable to the dominant operators, including measures regarding rates, quality of service or information, the flexibility so that we can adopt competitive market policies will probably be affected. The enactment of any new legal framework could have a significant adverse effect on our operations.

## REGULATION ON NET NEUTRALITY

We support the principle of open Internet in the sense that clients can access services, applications and content in a non-discriminatory manner. For such access to be updated with quality and diversity, the possibility of traffic management and network administration is necessary.

The risk of strict regulation, which does not allow operators to manage the necessary network resources for efficient operation, would impact quality and slow down innovation and the provision of new services and applications.

On the other hand, the opportunity to have a flexible regulation based on general principles, in the matter of net neutrality grants the necessary legal certainty to promote investment in sufficient infrastructure to continue facing the challenges involved by the exponential growth of data carried by telecommunications networks, with services and applications such as 5G, Internet of Things and others that will require a solid, robust, and resilient infrastructure.

We highlight the urgent need to continue to have the commercial freedom that allows operators to enter into different types of agreements with content and application providers, in order to offer various commercial offers for different types of users.

If operators have this possibility, it will benefit the end user to have the freedom to choose the offers and modalities that best fit their needs. Transparency in these offers is essential for clients to have enough decision-making elements.

## SANCTIONING PROCESSES ON ZERO RATING

Zero-Rating, understood as the practice of providing Internet access without additional cost or debit of the quota of data included to the user in their rate plan or package, under certain conditions, is a practice commonly carried out by the industry in general. In this sense, we recognize in Zero-Rating a window of opportunity to contribute to the development and bridging the digital divide, with programs focused on providing education, health, and training.

However, given the origin of this practice, our operations are not exempt from possible claims by competitors or other commercial agents that could allege unfavorable conditions in the competition process.

In order to avoid this type of effects, we conduct ourselves within a framework of transparency, fairness and non-discriminatory treatment, we make available to third parties interested in sponsoring traffic generated to their Internet pages or through their mobile applications, the same commercial conditions, and it has been ensured that users have fair access to the Internet, content and applications.

## PAID PEERING & FREE PEERING

We carry out the exchange of Internet traffic efficiently and in accordance with high domestic and international performance standards to provide our clients with the best capacity, speed and availability at all times.

To achieve this, we permanently establish and maintain agreements for the direct (peering) or indirect (transit) exchange of Internet traffic with various Internet Service Providers (or ISPs).



## ADDITIONAL RADIO SPECTRUM CAPACITY AND NETWORK UPGRADES

Radio spectrum use concessions are essential for the Company’s growth and for the operation and deployment of our networks, including networks with new generation technologies such as 5G LTE to offer better data services and value-added services. We acquire most of our concessions for the use of the radioelectric spectrum through public auctions held by the governments of the countries where we operate.

In most of these countries, participation in radio spectrum auctions requires prior government authorization and we may be subject to maximum limits on the amount of spectrum we can acquire. Among other things, the inability to acquire additional radio spectrum could cause a decrease in the quality of the Company’s network and services, limit our ability to meet user needs, and consequently affect our ability to compete successfully.

If we are not able to acquire additional capacity in the radioelectric spectrum, we could increase the density of our network through the construction of new radio bases and switching centers. However, these measures are extremely expensive, may be subject to restrictions and authorizations in terms of local regulation and would not fully solve the needs of the Company. América Móvil participates in industry associations that promote spectrum allocation in order to improve the quality of services that the telecommunications industry can provide.

## CONCESSIONS AND LICENSES FOR FIXED PERIODS

Our concessions and licenses have established expiration periods, which typically range from 5 to 20 years, and are generally subject to renewal upon payment of applicable fees, but there is no guarantee that the Company will obtain the necessary extensions. The loss or failure to extend any concession could have a significant adverse effect on our activities and results of operations. Our ability to obtain the extension of the concessions, as well as the terms of such extensions, depend on many factors that are beyond our control, including the prevailing regulatory and political environment at the corresponding time. Generally, the amount to be paid for rights is established at the time of granting the respective extension. The granting of a certain extension may be subject to the condition that we bind ourselves to new and more stringent terms and requirements of service. In some countries and under certain circumstances (especially regarding fixed services), we may be forced to transfer to the government certain assets related to the exploitation of its concessions, but the method of calculating the applicable consideration varies in each jurisdiction.

There is no certainty as to whether the governments of most of the countries in which we operate would enforce this obligation, or how they would interpret the practice of the corresponding dispositions. In addition, the regulatory authorities of the different countries where we operate are empowered to revoke or seize concessions in certain cases. For example, in accordance with the Federal Telecommunications and Broadcasting Law, the Mexican government can seize the networks and facilities of the Company and use the personnel who serve its networks in case of non-compliance with the obligations established in its concession titles or in case of natural disasters, war, serious disturbance of public order or when an imminent danger to national security, internal peace of the country or the economy is foreseen, or to guarantee continuity in the provision of services.

## CHANGES IN THE TELECOMMUNICATIONS SECTOR

The telecommunications sector continues to undergo major changes due to the development of new technologies that offer users a wide range of options to meet their communications needs.

These changes include, among others, regulatory reforms, the evolution of industry standards, the constant improvement of the capacity and quality of digital technology, the reduction of the development cycles of new products, the evolution of clean technologies and renewable energy, and the variation of the needs and preferences of the end users.

Both, the pace and level of growth of demand by users and the extent to which the prices of airtime, broadband services, Pay TV services and line fees will continue to decline, are uncertain. As the Company’s growth is increasingly dependent on the revenues generated by our data services, it is important that we maintain a competitive position when it comes to providing high-quality broadband and Internet access services. If we fail to keep up with technological advances, either in a timely manner or at an acceptable cost, we could lose clients to our competitors.

In general terms, the development of new services in the sector requires the Company to anticipate and respond to the diverse and changing demands of our users. In addition, it requires us to make significant capital investments - including maintenance and modernization of our networks on a continuous basis - to expand their coverage, increase their capacity to absorb the growth in demand for broadband services and adapt to new technologies. We may not be able to accurately predict technology trends or the success of new services in the market. In addition, the introduction of new services may be subject to legal or regulatory restrictions. If such services fail to gain market acceptance, or if the costs associated with their implementation and introduction increase significantly, our ability to retain and attract users could be adversely affected.

The foregoing is applicable to many of the services we provide, including services that use wire and wireless technologies.

## CORRUPTION, BRIBERY AND MONEY LAUNDERING

We operate in several countries, subject to complex regulatory frameworks whose application is increasingly strict. Our corporate governance practices and the processes we use to ensure compliance with the legal provisions we are subject to, may be insufficient to prevent the violation of applicable laws, regulations, and accounting or corporate governance standards. Failure to comply with applicable laws and regulatory measures could damage our reputation, expose us to significant fines or penalties, and adversely affect our operations and ability to enter financial markets. The Company could be affected by violations of our code of ethics, our policies to prevent corruption, our protocols of business conduct, fraudulent behavior and corrupt or dishonest practices on our employees, contractors, or other representatives.

We have governance and compliance processes to prevent legal, accounting, or corporate governance rules and regulations violations. However, through our Integrity and Compliance Program, we better implement measures to mitigate these impacts. To effectively control corruption, América Móvil has implemented preventive measures such as the development of anti-corruption policies, anti-corruption clauses in all our contracts with third parties, and due diligence processes for third parties, among other actions. We have also trained our employees on anti-corruption issues through a mandatory online course for all personnel in all our subsidiaries.

## SERVICE INTERRUPTIONS AND SYSTEM FAILURES

We need to continue providing our clients with a continuous and reliable service through our network. The Company’s network and infrastructure are exposed to various risks, including the following:

- Physical damage to access lines and fixed networks;
- Power interruptions or voltage variations;
- Natural disasters;
- Climate change;
- Malicious actions, such as theft or misuse of clients’ data;
- Limitations on the use of our base stations;
- Defects in computer programs;
- Human errors; and,
- Other interferences beyond our control, including those generated as a result of civil unrest in the countries in which we operate.

For example, our satellite operations in Brazil could be affected if there is a delay in the launch of new satellites to replace those in use when they reach the end of their useful lives. Such delay could be attributable to delays in the construction of the satellites, the lack of availability of vehicles for their launch into orbit and / or their failed launch.

In the past, our operations have been affected by natural disasters such as hurricanes and earthquakes. We have taken several measures to reduce these risks, but there is no guarantee that these measures will completely prevent systems failure. Failures in our systems could cause interruptions in services or decreases in capacity for users, any of which could have an adverse effect by causing an increase in expenses, expose us to legal responsibility, generate loss of current and potential clients, reduce the levels of traffic generated by users, decrease our revenues, and damage our reputation, among other things.

## CYBERSECURITY INCIDENTS AND OTHER NETWORK BREACHES

In recent years, both cybersecurity incidents and tactics to breach critical systems of large companies in order to gain access to and exploit sensitive information have evolved and increased in sophistication and frequency. Although we use several measures to prevent, detect and mitigate these incidents, there is no guarantee that we will be able to adequately anticipate or prevent them. Cybercrime, including attempts to overload our servers with attacks to prevent legitimate users of a service from accessing it, theft, social engineering practices, phishing, ransomware, and other similar disruptions caused by accessing or attempting unauthorized access to their systems could result in the destruction, misuse or disclosure of personal data or other sensitive information.

The constant evolution of cybersecurity incidents makes their detection or prevention difficult, making our systems, those of our service providers and those of our clients vulnerable. The violation or damage of our systems could cause data loss, access problems to these systems and interruptions in their operations. If any of these events were to occur, the loss, unauthorized disclosure, or lack of access to data and the impact of mobile or fixed networks could have an adverse effect on our activities and results of operations.

The costs related to a cybersecurity incident could include increased expenses for information and cybersecurity measures, damage to the Company’s reputation or loss of customers and partners, which could cause financial losses due to the need to adopt remedial measures and face possible liabilities, including possible litigation and penalties.

Any of these circumstances could have a significant adverse effect on our results of operations and the financial condition of the Company.



## PROPER MANAGEMENT OF PERSONAL DATA

We process large amounts of personal data of our clients and employees and are subject to various regulatory requirements regarding compliance, security, privacy, and quality in the management of this data. The lack of proper management of personal data could lead to improper handling of personal data, which in turn could lead to data loss, investigations or sanctions by regulatory authorities and create risks of cybersecurity. We are subject to regulation regarding the privacy of personal data in all the countries in which we operate; and compliance with applicable regulations could expose us to higher costs and limit our ability to transmit data between certain jurisdictions, which could adversely affect our operations.

Therefore, in recent years, the Company has strengthened its data governance through privacy policies and processes, including the implementation of training and certifications in order to prevent such violations and comply with the highest international standards in order to drive everyone towards that standard.

## CHANGES IN THE JOB MARKET

The job market in the telecommunications sector is highly competitive, especially for highly trained employees and management. The job market has become even more challenging, after the pandemic. The acceleration of the digital transformation across industries has increased the demand for highly skilled profiles in other sectors. Furthermore, the home office experience during lockdowns has led employees to more likely take a pay cut for non-financial goals, such as a better work-life balance, flexible and hybrid work models, or more enjoyable work, therefore increasing competition among companies to attract or retain highly trained professionals.

We believe that our future success will largely depend on our ability to hire, motivate, develop, and retain highly talented employees for all areas of the company, including the CEO and other members of the management team. If we are unable to hire or replace this type of employees with highly skilled and experienced successors, we could face difficulties in executing our strategic plans. If the Company's key personnel are separated from the company, our activities could be adversely affected. We could be forced to incur significant costs to identify and hire employees to replace those who leave the company, and we could suffer a great loss of experience and talent. In such a case, the Company could be unable to achieve the objectives of the business plan, which in turn could have an adverse impact on our growth in revenues and profitability.

One of the key factors that can make employees value one company over another, regardless of an economic offer; is purpose and culture. This year, we reviewed our company purpose and communication strategy to make sure that all our employees know and are inspired by our purpose, as a means to continue advancing towards achieving a sustainable growth culture.

## KEY PLAYERS IN THE VALUE CHAIN

We rely on several key suppliers to provide us with mobile phones, network equipment or services, which we need to expand and operate our business. If these suppliers do not provide us with equipment or services in a timely manner, we could experience service interruptions, which could have an adverse effect on our revenues and results of operations. Furthermore, this could translate into non-compliance with the conditions stated in our concession titles.

Actions taken by government or regulatory authorities regarding certain suppliers could affect the Company. For example, the governments of the United States and Canada, among others, are currently conducting a regulatory review of certain international providers of network equipment and technologies to assess potential risks. We cannot predict the results of such assessments, including the possible imposition of any restrictions on our main suppliers, and consequently, we could not predict how such restrictions would affect our operations.

In order to be able to identify third-party risks within the value chain, we map the critical parts of the business into the following categories: main business partners, non-replaceable business partners, critical component business partners, as well as business partners with environmental risks, human rights, money laundering and/or corruption.

In addition, through our Integrity and Compliance Program, we have developed a Due Diligence Protocol with Third Parties focused on strengthening risk management in our value chain.

HEALTH RISK CONCERNS

The use of portable communication devices has been said to carry health risks, - including the risk of developing cancer, due to the radio frequencies they emit. In the United States, several mobile telecommunications companies have been subject to lawsuits based on allegations that the use of mobile phones has had a variety of adverse health effects and our subsidiaries may be involved in similar litigation in the future. Government authorities are constantly updating the regulation applicable to electromagnetic emissions generated by portable communication devices and base stations, according to the latest international recommendations.

However, the health and safety of our customers and users is our priority. The Company is committed to comply with international recommendations and guidelines regarding electromagnetic fields in all our technologies in accordance with the levels approved by the World Health Organization and the International Commission for Non-Ionizing Radiation Protection (ICNIRP). Likewise, we request that our equipment and device suppliers comply with applicable technical regulations and standards related to exposure to electromagnetic fields and radio frequencies.

ECONOMIC, POLITICAL AND SOCIAL CONDITIONS

Our financial performance can be significantly affected by the economic, political, and social situation of the markets where we operate. In the past, many countries in Latin America and the Caribbean have experienced major economic, political, and social crises that could be repeated in the future. We cannot predict whether changes in administration will lead to government policy reforms and, if applicable, that such reforms will affect our operations.

- The economic, political, and social factors that could affect the Company’s performance include:
- the strong influence of the government on the economy of each country;
  - significant fluctuations in economic growth;
  - high levels of inflation, or hyperinflation;
  - currency fluctuations;
  - the imposition of exchange controls or restrictions for the transfer of resources abroad;
  - increases in interest rates at local level;
  - price controls;
  - changes in government policies in economic, fiscal, labor or other matters;
  - the establishment of trade barriers;
  - changes in laws or regulations; and,
  - political, social, and economic instability in general, as well as civil unrest.

The existence of unfavorable economic, political and social conditions in Latin America, the United States, the Caribbean or Europe could inhibit the demand for telecommunications services, cause uncertainty regarding the environment in which we operate, affect our ability to obtain the extension of our services, concessions and authorizations or to maintain or increase our profitability or market share or affect our efforts to make acquisitions in the future, all of which could have a material adverse effect on the Company. In addition, perceptions of risk in the countries in which we operate could adversely affect the trading prices of our shares and ADSs and restrict our access to international financial markets.

We cannot predict the policy changes those new administrations would adopt, nor the impact of the changes on our operations.

CHANGES IN FISCAL REGIME

We are subject to tax regulation in all the countries where we operate. Future reforms in such regulation could have material effects on our business.

América Móvil complies with all applicable tax laws and regulations in the countries where we operate. América Móvil does not use structures aimed at tax evasion.



# APPENDIX C: CONTRIBUTION TO UNSDGS AND TO THE PRINCIPLES OF THE UN GLOBAL COMPACT

(102-12)

## CONTRIBUTION TO THE TEN PRINCIPLES OF THE UN GLOBAL COMPACT

Since 2016, América Móvil and our subsidiaries have made a tangible effort to comply with the Ten Principles of the Global Compact and align our operation to them. These Principles and the initiatives we are implementing to address each of them are:

PRINCIPLE	OUR INITIATIVE
1. COMPANIES MUST SUPPORT AND RESPECT THE PROTECTION OF INTERNATIONALLY PROCLAIMED HUMAN RIGHTS.	América Móvil’s Human Rights Policy is aligned with the United Nations Universal Declaration of Human Rights, the Declaration on fundamental principles and rights at work proclaimed by the International Labor Organization (ILO) and the Guiding Principles on the Business and Human Rights established by the United Nations. Furthermore, we recognize that as a telecommunications service provider with operations in 24 countries, we can be a constructive influence on human rights in the region, therefore, we constantly seek ways to protect human rights in a consistent manner with our internal policies and the applicable legislation.
2. BUSINESSES MUST ENSURE THAT THEY ARE NOT COMPLICIT IN HUMAN RIGHTS ABUSES.	<p>Through América Móvil’s Commercial Integrity Policy, we evaluate our suppliers, retailers, and contractors by promoting alignment with respect for human rights throughout our value chain. This year, we developed a Third-Party Due Diligence Protocol to assess all suppliers and evaluate in detail the practices of those who turn out as high-risk suppliers in Human Rights. Our compliance and procurement teams continue working to align practices across operations in teams of evaluation, supplier selection, supplier engagement and grievance mechanism.</p> <p>We also include a sustainability clause in the contracts, which establishes the following: The supplier guarantees that the materials and/or products that have been used directly or indirectly by subcontractors throughout the value chain have a legal and sustainable origin.</p> <p>The supplier ensures that the minerals used in its products do not come from conflict zones or adjacent areas and, therefore, its purchase does not finance armed conflicts or human rights violations.</p> <p>América Móvil may require proof of the above at any time and the supplier must be able to demonstrate that the origin of its products excludes “conflict zones”.</p> <p>The supplier ensures that it does not violate any human rights and has policies and mechanisms to ensure that human rights are respected in its business and that of its suppliers. The supplier is committed to preventing and mitigating any negative impact on human rights related to its activities, products, or services.</p>



PRINCIPLE	OUR INITIATIVE
<b>3. COMPANIES MUST DEFEND FREEDOM OF ASSOCIATION AND THE EFFECTIVE RECOGNITION OF THE RIGHT TO COLLECTIVE NEGOTIATION.</b>	<p>América Móvil has a section in both, our Code of Ethics, and our Human Rights Policy in which it is specified that it does not interfere when its employees exercise their freedom of association and collective negotiation.</p> <p>This principle is also stipulated in América Móvil’s Commercial Integrity Policy and in our Third-Party Due Diligence Protocol applicable to our business partners.</p>
<b>4. BUSINESSES SHOULD ADVOCATE FOR THE ELIMINATION OF ALL FORMS OF FORCED AND COMPULSORY LABOR.</b>	<p>América Móvil has a section in both, our Code of Ethics, and our Human Rights Policy in which it specifies our commitment to fight and prevent all forms of forced and compulsory labor.</p> <p>This principle is also stipulated in América Móvil’s Commercial Integrity Policy that applies to our business partners. This year, we developed a Third-Party Due Diligence Protocol to assess all suppliers and evaluate the practices of those who turn out as high-risk suppliers in Labor and Human Rights in detail. Our compliance and procurement teams continue working to standardize practices across operations in teams of evaluation, supplier selection, supplier engagement and grievance mechanism.</p>
<b>5. BUSINESSES MUST ADVOCATE FOR THE EFFECTIVE ABOLITION OF CHILD LABOR.</b>	<p>América Móvil has a section in both, our Code of Ethics and in our Human Rights Policy in which we oppose child exploitation and take preventive measures.</p> <p>This principle is also stipulated in América Móvil’s Commercial Integrity Policy that applies to our business partners. This year we developed a Third-Party Due Diligence Protocol to assess all suppliers and evaluate in detail the practices of those who turn out as high-risk suppliers in Child Exploitation. Our compliance and procurement teams continue working to standardize practices across operations in teams of evaluation, supplier selection, supplier engagement and grievance mechanism.</p>

PRINCIPLE	OUR INITIATIVE
<b>6. BUSINESSES SHOULD ADVOCATE FOR THE ELIMINATION OF DISCRIMINATION REGARDING EMPLOYMENT AND OCCUPATION.</b>	<p>We have an Inclusion and Diversity Policy, which specifically seeks to establish the principles, criteria and guidelines that ensure a culture of inclusion and non-discrimination; as well as equal opportunities for all people, both at the beginning of their careers and when developing within the Company.</p>
<b>7. BUSINESSES SHOULD SUPPORT A PREVENTIVE APPROACH TO ENVIRONMENTAL CHALLENGES.</b>	<p>We developed América Móvil’s Environmental Policy to ensure that we carry out our operations and decision-making processes with the highest sense of responsibility and care for the environment. In addition, the Policy will be applicable to all our employees, suppliers, and contractors. This year, we developed a Third-Party Due Diligence Protocol to assess all suppliers and evaluate in detail the practices of those who turn out as high environmental risk suppliers. Our compliance and procurement teams continue working to standardize practices across operations in teams of evaluation, supplier selection, supplier engagement and grievance mechanism.</p> <p>Furthermore, we developed an online training platform to align our value chain with América Móvil’s principles and build ESG capabilities, including measuring and reducing environmental footprint.</p>
<b>8. BUSINESSES SHOULD TAKE INITIATIVES TO PROMOTE GREATER ENVIRONMENTAL RESPONSIBILITY.</b>	<p>América Móvil has a Commercial Integrity Policy addressed to all our partners: suppliers, retailers, clients, contractors, consultants, agents and anyone related to América Móvil or our subsidiaries worldwide. This year, we developed a Third-Party Due Diligence Protocol to assess all suppliers and evaluate in detail the practices of those who turn out as high environmental risk suppliers. Our compliance and procurement teams continue working to standardize practices across operations in teams of evaluation, supplier selection, supplier engagement and grievance mechanism.</p> <p>We also include a sustainability clause in the contracts that establishes the following: The supplier guarantees that it complies with all environmental laws and regulations applicable to its operations. In addition, the supplier ensures that it has a waste management plan to prevent and treat the waste, that it generates.</p>





PRINCIPLE

OUR INITIATIVE

9. COMPANIES SHOULD PROMOTE THE DEVELOPMENT AND DISSEMINATION OF ENVIRONMENTALLY FRIENDLY TECHNOLOGIES.

América Móvil’s efforts in the Ninth Principle are reflected through our several energy efficiency programs, as well as through our circular economy programs, which seek to reduce the amount of electronic waste by reusing the parts and components of the electronic devices that can still be used, and properly disposing of those that cannot be recycled. Additionally, we acknowledge our role as potential catalysts of Green House Gas (GHG) emissions through the digital solutions that we offer to our customers and corporate clients.

10. BUSINESSES SHOULD WORK AGAINST CORRUPTION IN ALL ITS FORMS, INCLUDING EXTORTION AND BRIBERY.



Our Compliance and Integrity Program has updated our Anti-Corruption Policy and issued complementary policies on Donations, Procurement, Sponsorship and Anti-Money Laundering to ensure that any activity carried out by, or on behalf of our Company, is based on the ethics and values that defines us, condemning corruption, bribery, fraud, or any other illegal act that may occur throughout our value chain. In order to ensure understanding of this policy and what is expected of employees, suppliers, distributors and contractors, we developed an online training on Anti-Corruption along with the *Centro de Investigación y Docencia Económicas (CIDE) and Transparencia Mexicana*.

CONTRIBUTION TO THE UN SDGS

(102-12)



At América Móvil, we seek to actively contribute to the achievement of the Sustainable Development Goals of the United Nations 2030 Agenda. Therefore, we have aligned our materiality and identified key projects that could contribute to the SDG goals.

As one of the leading telecommunications operators worldwide and given our geographic footprint, we have the opportunity to have a significant impact on at least these 9 goals:

	AMÉRICA MÓVIL PROGRAMS	SUSTAINABLE DEVELOPMENT GOALS INDICATOR	2021 PROGRESS
	<ul style="list-style-type: none"><li>Aprende.org</li><li>Khan Academy in Spanish</li><li>PruébaT</li><li>Capacítate para el Empleo</li></ul>	<p><b>4.1.1</b> Proportion of boys, girls and teenagers who, a) in the second and third grades, b) at the end of elementary education and c) at the end of lower middle school education, have reached at least a minimum level of proficiency in i) reading and ii) mathematics, by gender.</p> <p><b>4.3.1</b> Participation rate of youth and adults in academic and non-academic education and training in the last 12 months, broken down by gender.</p> <p><b>4.4.1</b> Proportion of youth and adults with information and communication technology (ICT) skills, broken down by type of technical skills.</p>	<p><b>4.11.</b> This is the number of students that used PruebaT as a tool to enhance their proficiency in reading and math:</p> <p>a) in the second and third grades: 20.21% (+1.2M students).</p> <p>b) in the fifth and sixth grades: 23.94% (+1.4M students).</p> <p>c) at the end of lower middle school: 21.67% (+1.2M students).</p> <p>Of the total students in the platform, 32.5% were girls and 28.5% were boys.</p> <p><b>4.3.1</b> Academic Education: Men 16.92%/Women 18.39%; Non Academic Education: Men 11.84% / Women 14.46%; Training: Men 17.46% /Women 20.94%.</p> <p><b>4.4.1</b> During this year, 492,784 people were trained to develop digital skills in our platform, which is 35% of the total users in 2021. For details on the kind of digital skills please go to Appendix F of this document.</p>
	<ul style="list-style-type: none"><li>Code of Ethics and Diversity and Inclusion Policy</li><li>Labor Equality Distinction</li><li>Digital Divide Projects</li></ul>	<p><b>5.5.2</b> Proportion of women in management positions.</p>	<p><b>5.5.2</b> By the end of 2021, at América Móvil, the proportion of women in all management including junior, middle, senior, and executive positions was 32%.</p>



AMÉRICA MÓVIL PROGRAMS	SUSTAINABLE DEVELOPMENT GOALS INDICATOR	2021 PROGRESS
 8 DECENT WORK AND ECONOMIC GROWTH	<ul style="list-style-type: none"><li>Labor Benefits</li><li>Health and Safety Programs and Certifications</li></ul>	<p><b>8.5.1</b> Average hourly earnings of employees, broken down by gender, occupation, age and people with disabilities.</p> <p><b>8.8.1</b> Fatal and non-fatal occupational injury frequency rates, broken down by gender and immigration status.</p>
 9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	<ul style="list-style-type: none"><li>Digitization of customer service channels</li><li>Research and development</li><li>Infrastructure</li><li>Solutions for reducing emissions and consumption of energy and fuels</li></ul>	<p><b>9.4.1</b> CO<sub>2</sub> emissions per unit of added value.</p> <p><b>9.c.1</b> Proportion of the population with mobile network coverage, broken down by technology.</p>
 10 REDUCED INEQUALITIES	<ul style="list-style-type: none"><li>Code of Ethics</li><li>Diversity and Inclusion Policy</li><li>Whistleblower Portal</li></ul>	<p><b>10.3.1</b> Proportion of the population that declares that they have felt personally discriminated against or harassed in the last 12 months for reasons of discrimination prohibited by international human rights law.</p>
 11 SUSTAINABLE CITIES AND COMMUNITIES	<ul style="list-style-type: none"><li>Environmental Policy</li><li>Waste management</li></ul>	<p><b>11.6.1</b> Proportion of urban solid waste collected periodically and with a proper final discharge, compared with the total urban solid waste generated, broken down by city.</p>
 12 RESPONSIBLE CONSUMPTION AND PRODUCTION	<ul style="list-style-type: none"><li>Recycling and reuse of mobile devices and accessories</li></ul>	<p><b>12.5.1</b> Domestic recycling rate, in tons of recycled material.</p>
 13 CLIMATE ACTION	<ul style="list-style-type: none"><li>UN Pledge to Limit Climate Change to 1.5°C</li><li>Climate change strategy</li><li>Commitment to move towards being carbon neutral by 2050</li><li>Response to natural disasters and humanitarian crises</li></ul>	<p><b>13.2.2</b> Year-over-year greenhouse gas measurements.</p>

AMÉRICA MÓVIL PROGRAMS	SUSTAINABLE DEVELOPMENT GOALS INDICATOR	2021 PROGRESS
 14 LIFE BELOW WATER	<ul style="list-style-type: none"><li>Conservation of biodiversity with the WWF - Telmex Telcel Foundation Alliance: Sea of Cortez</li></ul>	<p><b>14.a.1</b> Proportion of total research budget allocated to research in the field of marine technology.</p> <p><b>14.5.1</b> Coverage of protected areas in reference to marine areas.</p>
 15 LIFE ON LAND	<ul style="list-style-type: none"><li>Conservation of biodiversity with the WWF - Telmex Telcel Foundation Alliance: Jaguar and Monarch Butterfly Conservation</li></ul>	<p><b>15.2.1</b> Progress in sustainable forest management.</p> <p><b>15.a.1.b</b> Financing through economic instruments relevant to diversity.</p>

**14.a.1** \$2,350,000 Mexican pesos have been allocated to research in marine technology, including satellite tracking, photo identification, and machine learning modeling.

**14.5.1** Contribution to the protection of 56,214 acres (22,749.08 hectares) in the Bahía de La Paz for the Whale Shark Refuge. Bahía de la Paz is 440,000 acres (178,000.00 hectares) size. The collaboration with RABEN/ECOBAC permitted the rescuing of entangled whales in Loreto, Bahía de La Paz, Laguna San Ignacio, Bahía Banderas, and Los Cabos. These areas include 557,180 acres (225,483 hectares) (510,520 acres (206,600 hectares) in Loreto, 43,243 acres (17500 hectares) in Laguna San Ignacio, and 3,418 acres (1383 hectares) in Bahía Banderas) of Natural Protected Areas and represent a migratory route for whales, promoting the connectivity between sites. In addition, we support monitoring in the Islas Marias Biosphere Reserve, which has an area of 1,920,750,785 (777,300,265 hectares).

**15.2.1** See results achieved through the Conservation Program for the Monarch Butterfly and Jaguar Conservation Program in Chapter 3.

**15.a.1.b** We supported the updating, publishing, and evaluation of the white shark Action Program for the Conservation of the Species (PACE); it impacts its entire distribution and all the National Protected areas where the great white shark is distributed. In 2020, the “Action Program for the Conservation of the Hawksbill Turtle (PACE)” was updated and published with WWF, CONANP, and 52 Mexican specialists.



# APPENDIX D: ENVIRONMENTAL INDICATORS

## ENERGY

(302-1)

ENERGY CONSUMPTION PER COUNTRY OR REGION (MWH CONSUMED)				
COUNTRY/REGION	2018	2019	2020	2021
Mexico <sup>1</sup>	2,328,810	2,320,115	2,342,374	2,310,211
Brazil	1,264,838	1,379,276	1,383,779	1,442,714
Colombia <sup>2</sup>	443,720	430,472	462,572	491,255
Southern Cone	457,718	469,088	448,511	449,753
Andean Region	238,548	233,771	280,991	310,778
Central America	326,230	382,472	408,184	410,008
Caribbean	254,501	258,289	267,046	265,924
Europe	679,975	714,388	763,111	803,948
Total (MWH)	5,994,340	6,187,871	6,356,568	6,484,591
Total (GJ)				23,344,521
% Renewables				21%
% Grid Electricity <sup>3</sup>				79% <sup>4</sup>

<sup>1</sup> Includes: Telmex, Telcel, AMCO, Sección Amarilla, Telvista, Global Hitss, Claro Pay, Claro Enterprise Solutions, Hitts Inc., LATAM Telecommunications.

<sup>2</sup> Includes: Claro Colombia and Global Hitss Colombia.

<sup>3</sup> The remaining 16% comes from combined cycle plants in Mexico.

<sup>4</sup> This figure includes combined cycles in Mexico.

(302-3)

ENERGY BY TERABYTE STREAMED ON THE NETWORK			
	2019	2020	2021
Traffic in Tb <sup>5</sup>	5,797,075	8,667,661	9,867,329
Energy per TBs	1.07	0.73	0.66

<sup>5</sup> Terabyte.

DATA CENTER EFFICIENCY						
AVERAGE POWER USAGE EFFECTIVENESS (PUE)		2018	2019	2020	2021	TARGET FY 2021
Average PUE		1.93	2.43	2.01	1.67 <sup>6</sup>	2
Coverage (% of total ICT population)	ICT population defined as a percentage of the total compute resources	52	43	34.27	48.66	

<sup>6</sup> Data Center measurement has been standardized; therefore operations have improved their measurement processes.

SHARE OF RENEWABLE ENERGY IN DATA CENTERS					
DATA CENTER ENERGY USAGE	2018	2019	2020	2021	RENEWABLE ENERGY TARGET FY 2021
Total energy used in data centers (MWh)	197	288	95	156.17	----
Percentage of renewable energy (of total energy)	50	35	18.9	13.81	20

FUEL CONSUMPTION

(302-1)

TOTAL FUEL CONSUMPTION				
	2018	2019	2020	2021
Gasoline (lts)	53,780,878	54,369,941	46,726,306	51,129,177
Diesel (lts)	49,123,535	48,303,092	46,503,777	44,037,233
Biodiesel (lts)	49,652	369,238	56,324	18,033
LP Gas (lts)	654,166	774,500	630,962	623,191
Bioethanol (lts)	4,494,491	5,451,317	4,200,069	0
Ethanol (lts)				2,629,748
CNG (m³)	0	4,487	3	15
Natural Gas (m³)	26,453	1,369,057	1,328,798	1,485,188

2021 FUEL CONSUMPTION PER COUNTRY/REGION							
COUNTRY/REGION	GASOLINE (LTS)	DIESEL (LTS)	BIODIESEL (LTS)	LP GAS (LTS)	ETHANOL (LTS)	CNG (M³)	NATURAL GAS (M³)
Mexico	37,605,596	6,207,467		342,716			
Brazil	6,680,082	2,722,655			2,629,748	0	
Colombia	686,833	9,586,597					
Southern Cone	93,326	2,702,004	18,033				9,117
Andean Region	534,033	1,915,066					
Central America	1,565,446	7,514,391					
Caribbean	2,854,917	8,259,063		133,239			
Europe	1,108,944	5,129,990		147,236		15	1,476,071
Total	51,129,177	44,037,233	18,033	623,191	2,629,748	15	1,485,188



WASTE MANAGEMENT

(306-2, 306-4, 306-5)

TOTAL WASTE

BY DISPOSAL METHOD	2018	2019	2020	2021
Recycled (Tons)	16,807	19,370	15,611	16,212
Reused (Tons)	250	169	571	121
Landfill (Tons)	2,022	4,007	5,033	4,984
Incinerated (Tons)	1,250	1,150	957	1,421
Total	20,329	24,696	22,172	22,738

2021 NON-HAZARDOUS WASTE BY DISPOSAL METHOD BY COUNTRY OR REGION

COUNTRY/REGION	RECYCLED (TONS)	REUSED (TONS)	LANDFILL (TONS)	INCINERATED (TONS)	TOTAL
Mexico	2,334	108	546	0	2,988
Brazil	2,228	0	0	0	2,228
Colombia	3,072	0	669	0	3,741
South Cone	1,115	0	2,974	0	4,089
Andean Region	373	0	0	2	375
Central America	2,180	0	0	147	2,327
Caribbean	1,362	13	85	0	1,460
Europe	3,548	0	710	1,272	5,530
Total	16,212	121	4,984	1,421	22,738

RECYCLING RATE BY REGION

COUNTRY/REGION	RECYCLED (TONS)	TOTAL WASTE (TONS)	RECYCLING RATE
Mexico	3,115	3,782	82%
Brazil	2,372	2,372	100%
Colombia	3,216	3,885	83%
South Cone	1,756	4,730	37%
Andean Region	386	388	99%
Central America	2,180	2,327	94%
Caribbean	1,633	1,730	94%
Europe	3,548	5,529	64%
Total	18,205	24,743	74%

WATER

(303-5)

WATER CONSUMPTION (million m³)

	2018	2019	2020	2021
Total (m³)	4.5	3.06	2.30	3.9

As we move forward through the years, the main target is always improving the quality of our data, we have been finding opportunities, and now they are part of our reports; although water is not part of the production process, globally is a material topic, and that is why we are seeking and asking about consumption to find possible data and integrate into our report.

EMISSIONS

(305-1, 305-2, 305-3)

GREENHOUSE GAS EMISSIONS

TOTAL GHG EMISSIONS	2018	2019	2020	2021
Scope 1 Direct Emissions (Tons CO <sub>2</sub> e)	398,396	592,287	288,688	299,494
Scope 2 Indirect Emissions (Tons CO <sub>2</sub> e)	1,936,773	2,489,586	2,453,063	2,190,890
Scope 3 Emissions <sup>1</sup> (Tons CO <sub>2</sub> e)	--	5,346,759	6,412,754	2,645,826
Outside of Scopes <sup>2</sup> (Tons CO <sub>2</sub> e)	557	9,172	61,391	107,299
<b>Total Emissions (Tons CO<sub>2</sub>e)</b>	<b>2,335,726</b>	<b>8,437,804</b>	<b>9,215,896</b>	<b>5,243,509</b>

<sup>1</sup> Scope 3 includes the following categories: capital goods, business trips, employees' transportation, "end of life" treatment of goods sold, activities associated with energy and fuels (not included in scope 1 or 2), purchase of goods and services, use of goods sold, waste, transportation, and distribution ("downstream").

<sup>2</sup> Includes: refrigerant gases.

Since 2021, we have defined a different approach, reducing the categories to assess to get a better and more accurate outcome with all our brands; that is why in 2021, we are reporting only four classes, and yearly we will increment under an appropriate and standardize the methodology for all our brands.

GREENHOUSE GAS EMISSIONS BY COUNTRY OR REGION

COUNTRY/REGION	SCOPE 1 DIRECT EMISSIONS (TONS CO <sub>2</sub> E)	SCOPE 2 INDIRECT EMISSIONS (TONS CO <sub>2</sub> E)	SCOPE 3 EMISSIONS (TONS CO <sub>2</sub> E)	OUTSIDE OF SCOPES (TONS CO <sub>2</sub> E)	TOTAL EMISSIONS (TONS CO <sub>2</sub> E)
Mexico	123,344	941,542	1,269,977	77,322	2,412,185
Brazil	34,837	382,632	176,100	22,516	616,085
Colombia	30,386	70,557	240,211	340	341,494
South Cone	11,023	168,960	159,378	1,967	341,328
Andean Region	11,187	193,062	145,870	906	351,025
Central America	29,736	124,295	252,214	1,489	407,734
Caribbean	37,665	133,502	111,197	2,043	284,407
Europe	21,316	176,340	290,879	716	489,251
<b>Total</b>	<b>299,494</b>	<b>2,190,890</b>	<b>2,645,826</b>	<b>107,299</b>	<b>5,243,509</b>

(305-4)

CARBON EMISSIONS BY TERABYTE STREAMED ON THE NETWORK

	2019	2020	2021
Traffic in Tb <sup>3</sup>	5,797,075	8,667,661	<b>9,867,329</b>
Emissions (scope 1 and 2) per TBs	1.46	1.06	<b>0.53</b>

<sup>3</sup> Terabyte.





# APPENDIX E: LABOR INDICATORS

(102-7, 102-8)

OUR EMPLOYEES IN 2021

YEAR	TOTAL
2013	173,174
2014	191,156
2015	195,475
2016	194,431
2017	191,851
2018	189,448
2019	191,523
2020	186,851
2021 <sup>1</sup>	181,205

<sup>1</sup> TracFone is no longer part of América Móvil.

(405-1)

FULL TIME EMPLOYEE EQUIVALENTS (FTEs)  
BY AGE

AGE	PERCENTAGE
Less than 30 years old	19%
Between 30 and 50 years old	67%
More than 50 years old	14%

(405-1)

FULL TIME EMPLOYEE EQUIVALENTS BY COUNTRY OR REGION AND GENDER BY TYPE OF CONTRACT (FTEs)

COUNTRY/REGION	PERMANENT CONTRACT		TEMPORARY CONTRACT	
	MEN	WOMEN	MEN	WOMEN
Mexico	55,263	31,325	276	227
Brazil	19,105	14,530	-	-
Colombia	4,568	3,277	509	523
Southern Cone	4,269	2,874	3	-
Andean Region	3,576	2,649	2	2
Central America	6,564	3,149	-	-
United States	421	547	-	-
Caribbean	5,666	4,080	53	33
Europe	10,581	6,596	301	387
Total	109,591	68,479	1,144	1,172

PERCENTAGE FULL TIME EQUIVALENTS

COUNTRY/REGION	TOTAL	PERCENTAGE
Mexico	87,091	48%
Caribbean	9,831	5%
Europe	17,865	10%
Colombia	8,877	5%
Central america	9,713	5%
Andean region	6,229	3%
Southern cone	7,145	4%
Brazil	33,635	19%
Total	180,386	100%

(405-1)

FULL TIME EMPLOYEE EQUIVALENTS POSITIONS BREAKDOWN BY GENDER AND JOB TITLE

POSITION	MEN	WOMEN	TOTAL
Executive	627	166	793
Management	4,106	1,666	5,772
Employees with command	9,866	4,989	14,855
Employees without command	70,758	39,914	110,672
Entry level <sup>2</sup>	25,362	22,916	48,278
Total	110,719	69,651	180,370

<sup>2</sup> Employees who are in the range of the 5% lowest salary.



(401-1)

TURNOVER RATE<sup>1</sup>

	2018	2019	2020	2021
Turnover rate	12.90	12.92	6.11	11.94
Voluntary turnover rate	5.83	4.88	4.71	8.86

<sup>1</sup> Figures exclude our Call Centers.

(401-1)

TURNOVER RATE BY AGE 2021<sup>2</sup>

AGE	TOTAL	VOLUNTARY
Less than 30 years old	31.38	24.68
Between 30 and 50 years old	9.06	6.31
More than 50 years old	8.36	6.79

<sup>2</sup> Figures exclude our Call Centers.

(401-1)

VOLUNTARY TURNOVER BY GENDER 2021<sup>3</sup>

GENDER	TOTAL	VOLUNTARY
Men	11.83	8.90
Women	13.25	9.64

<sup>3</sup> Figures exclude our Call Centers.

POSITION	(401-1) NUMBER OF EMPLOYEE HIRES		PERCENTAGE POSITIONS FILLED BY INTERNAL CANDIDATES	
	MEN	WOMEN	MEN	WOMEN
Executive	31	8	15%	6%
Management	90	43	28%	11%
Employees with command	274	135	33%	32%
Employees without command	6,690	5,424	10%	7%
Entry Level	6,750	5,526	2%	2%

AVERAGE COST OF EMPLOYEE HIRES<sup>4</sup>  
(FIGURES IN MXN)

POSITION	MEN	WOMEN
Executive	11,903	11,903
Management		
Employees with command		
Employees without command		
Entry Level <sup>5</sup>		

<sup>4</sup> Average Cost per Full Time Equivalent (FTE).

<sup>5</sup> Employees who are in the range of the 5% lowest salary.

(401-1)

NEWLY HIRED EMPLOYEES

	2020	2021
Total number of newly hired employees	11,296	24,971
Number of women employees in new hires	4,009	11,136

(405-1)

WOMEN IN WORKFORCE

DIVERSITY INDICATORS	PERCENTAGE
Women in the total workforce	39%
Women in all management including junior, middle, senior, and top (executive positions)	32%
Women in first level management or junior management positions	34%
Women in top executive positions	21%
Women in management positions in revenue-generating functions (commercial role) <sup>5</sup>	52%
Women in STEM (Science, Technology, Engineering, and Mathematics) related positions	16%

<sup>5</sup> Includes, entry-level positions, employees with or without command, management level, and executive level. This figure differs from 2020, because positions related to the support of commercial roles were also included.





(405-1)

WOMEN IN SENIOR  
MANAGEMENT

2019	2020	2021
1,328	1,363	1,666

(405-1)

TOTAL NUMBER OF SENIOR  
MANAGEMENT EMPLOYEES

2019	2020	2021
5,279	5,407	6,565

(405-1)

EMPLOYEES BY NATIONALITY

FTEs 2021		
NATIONALITY	% OF TOTAL FTE	% OF TOTAL MANAGEMENT POSITIONS (INCLUDING JUNIOR AND MIDDLE MANAGEMENT)
Mexico	48%	40%
South America	31%	38%
Central America	5%	7%
Caribeean	5%	6%
Europe	10%	9%
Total	100%	100%

(405-1)

EMPLOYEES WITH DISABILITIES

TYPE OF DISABILITY	PERCENTAGE PER TYPE OF DISABILITY
Motor	63%
Auditive	6%
Visual	15%
Intellectual	3%
Visceral	11%
Multiple	3%

AVERAGE YEARS EMPLOYED BY THE COMPANY BY GENDER

	2021
Female employees	6.92 years
Male employees	8.35 years

(405-2)

GENDER PAY INDICATORS

YEAR	ANNUAL BASE SALARY			ANNUAL BASE SALARY + INCENTIVES		
	AVERAGE ANNUAL COMPENSATION FOR MALE EMPLOYEES	AVERAGE ANNUAL COMPENSATION FOR FEMALE EMPLOYEES	SALARY PER EMPLOYEE	AVERAGE ANNUAL COMPENSATION FOR MALE EMPLOYEES	AVERAGE ANNUAL COMPENSATION FOR FEMALE EMPLOYEES	SALARY PER EMPLOYEE
2021 (MXP)	341,988	243,808	303,960	565,845	437,972	516,095
2021 (USD)	16,866	12,024	14,990	27,888	21,600	25,452

EMPLOYEE LEVEL <sup>1</sup>	AVERAGE WOMEN SALARY (MXP)	AVERAGE MEN SALARY (MXP)
Executive level (base salary only)	1,788,884	2,043,336
Executive level (base salary + other cash incentives)	2,670,500	3,244,540
Management level (base salary only)	507,245	571,488
Management level (base salary + other cash incentives)	753,040	865,313
Non-management level (base salary only)	211,855	296,769
Non-management level (base salary + other cash incentives)	398,712	503,343

<sup>1</sup> Figures do not include CEO.

(404-3)

2021 FULL-TIME EMPLOYEES WITH A PERMANENT POSITION WHO RECEIVED PERFORMANCE EVALUATIONS BY REGION AND GENDER

COUNTRY/REGION	MEN	WOMEN	% OF EMPLOYEES
Mexico	20,936	14,185	40% <sup>1</sup>
Brazil	15,869	10,091	77%
Colombia	4,680	3,388	91%
Southern Cone	4,070	2,705	93%
Andean Región	3,491	2,666	97%
Central America	6,324	2,984	96%
Caribbean	5,840	4,091	97%
Europe	10,193	7,080	100%
Total	72,123	47,190	66%

<sup>1</sup> This year we were able to include Telmex, where unionized employees are measured by a collective performance evaluation by area or division.

EMPLOYEE CLIMATE SURVEY

WORK ENVIRONMENT SURVEY	2018	2019	2020	2021	2021 TARGET
Work environment survey score	75.6%	83.3%	82.6%	85.29%	80% SURVEY SCORE
Percentage of total employees	54.2	73.7	93.2	91.26	89% OF EMPLOYEE COVERAGE

PERCENTAGE OF TOTAL EMPLOYEES RECEIVING TRAINING

2019	2020	2021
76%	55%	88%

(404-1)

ANNUAL TRAINING HOURS PER EMPLOYEE<sup>2</sup>

2019	2020	2021
35	78	61

<sup>2</sup> Average annual training hours per FTE.

(404-1)

AVERAGE HOURS OF TRAINING BY GENDER BY EMPLOYEE POSITION FULL-TIME EQUIVALENTS (FTEs)

POSITION	MANDATORY TRAINING		NON-MANDATORY TRAINING	
	MEN	WOMEN	MEN	WOMEN
Executive	16	18	11	17
Management	14	19	10	11
Employees with command	28	33	25	30
Employees without command	22	30	23	33
Entry Level	52	60	31	31
Total	29	40	24	32

(404-1)

AVERAGE HOURS OF TRAINING BY GENDER AND AGE OF EMPLOYEES FULL-TIME EQUIVALENTS (FTEs)

	MANDATORY TRAINING	NON-MANDATORY TRAINING
Less than 30 years	59	35
Between 30 and 50 years	30	28
More than 50 years	15	13
Total	33	27





(404-1)

AVERAGE HOURS OF MANDATORY AND NON-MANDATORY TRAINING BY REGION AND GENDER 2021

COUNTRY/REGION	MANDATORY TRAINING		NON-MANDATORY TRAINING	
	MEN	WOMEN	MEN	WOMEN
Mexico	44	65	27	38
Brazil	1	3	2	5
Colombia	35	33	87	108
Southern Cone	5	5	22	27
Andean Region	15	15	27	32
Central America	40	77	12	17
Caribbean	37	61	75	70
Europe	3	4	3	3
Total	29	40	24	32

AVERAGE INVESTMENT OF MANDATORY AND NON-MANDATORY TRAINING BY REGION AND GENDER 2021

COUNTRY/REGION	USD		MXP	
	MEN	WOMEN	MEN	WOMEN
Mexico	35	29	712	597
Brazil	90	79	1,823	1,611
Colombia	135	139	2,741	2,817
Southern Cone	89	95	1,807	1,922
Andean Region	50	39	1,019	797
Central America	57	69	1,164	1,391
Caribbean	112	80	2,280	1,623
Total	54	51	1,086	1,028

AVERAGE INVESTMENT IN TRAINING BY GENDER AND POSITION OF FULL-TIME EQUIVALENT EMPLOYEES (FTEs)

POSITION	MANDATORY TRAINING				NON-MANDATORY TRAINING			
	USD		MXN		USD		MXN	
	MEN	WOMEN	MEN	WOMEN	MEN	WOMEN	MEN	WOMEN
Executive	14	41	274	826	98	102	1,978	2,073
Management	14	23	276	461	32	45	653	903
Employees with command	29	31	595	620	59	50	1,195	1,006
Employees without command	25	28	514	563	30	28	605	567
Entry Level	10	17	203	339	25	17	515	344
Total	22	24	440	491	32	26	647	537

TRAINING AND DEVELOPMENT EXPENDITURE (USD)

2017	2018	2019	2020	2021
37	30	30	15	16

(403-9)

FATALITIES

2018	2019	2020	2021
5	1	2	3

(403-9)

	2018		2019		2020		2021	
COUNTRY/REGION	MEN	WOMEN	MEN	WOMEN	MEN	WOMEN	MEN	WOMEN
Mexico	1	0	1	0	1	0	1	0
Brazil	1	0	0	0	0	0	1	0
Colombia	1	0	0	0	0	0	0	0
Southern Cone	0	0	0	0	0	0	0	0
Andean Region	0	0	0	0	0	0	0	0
Central America	1	0	0	0	1	0	0	0
Caribbean	0	0	0	0	0	0	1	0
Europe	1	0	0	0	0	0	0	0
Total	5	0	1	0	2	0	3	0

(403-9)

2021 EMPLOYEE FATALITIES

OPERATION	OCCUPATIONAL FATALITIES
Telmex	1
Brazil	1
Dominican Republic	1

In 2021 we had one electrocution incident that resulted in the loss of an employee at Telmex and one work incident at heights that resulted in the loss of an employee in Brazil. Also, one more incident related to a car accident due to bad weather resulted in the loss of a Claro Dominicana employee in Dominican Republic.

(403-9)

LOST TIME INJURY FREQUENCY RATE<sup>1</sup>

	2019	2020	2021		
COUNTRY/REGION	TOTAL	TOTAL	MEN	WOMEN	TOTAL
Total	1.65	0.99	1.03	0.71	0.91

<sup>1</sup> Lost Time Injury Frequency Rate based on 200,000 hours worked. This is the first time we report this indicator.

(403-9)

OCCUPATIONAL INJURY RATE<sup>2</sup>

	2019	2020	2021		
COUNTRY/REGION	TOTAL	TOTAL	MEN	WOMEN	TOTAL
Total	1.69	1.01	1.07	0.76	0.95

<sup>2</sup> Occupational Injury rate based on 200,000 hours worked. This is the first time we report this indicator.



## APPENDIX F: SOCIAL INDICATORS

## DIGITAL SKILLS AND DIGITAL EDUCATION PLATFORMS

(203-2)

## RESULTS OF APRENDE.ORG

PROGRAMS	TOTAL USERS	% WOMEN	% MEN	COUNTRIES/ TERRITORIES	HITS	COURSES/LESSONS/ LESSONS TAUGHT	VARIETY OF COURSES	ADAPTED VIDEO LESSONS	REGISTERED SCHOOLS / INSTITUTIONS
Capacitate para el empleo	9,819,606	54.30%	45.70%	194	3,346,901,523	33,386,660	420	-	-
Aprende.org	4,300,581	53.70%	46.30%	194	272,152,137	-	4,580	-	-
PruébaT	5,893,736	32.64%	28.75%	176	337,672,071	99,880,883	-	18,776	47,953
Khan Academy	18,692,630	60.89%	39.11%	188/240	393,749,803	79,374,975	-	6,896	-
<b>Aprende Total</b>	<b>38,706,833</b>			<b>194/240</b>	<b>4,350,475,534</b>	<b>212,642,518</b>	<b>5,000</b>	<b>25,672</b>	<b>47,953</b>
<b>Average of courses per user    5.49</b>									

DIGITAL SKILLS COURSES - APRENDE PLATFORM

During 2021, we offered the following: 1) basic digital skills courses to allow users to communicate and access public, commercial and financial services online; 2) courses to improve people’s employability, foster entrepreneurship, and SME’s development; along with 3) courses for men and women to become a specialist or technician in digital professions.

DIGITAL SKILLS COURSE	REGISTERED USERS	PERCENTAGE
Data Analysis	72,576	5.23%
Network Infrastructure	45,038	3.24%
Office Software Use	44,411	3.20%
Information and Data Skills	42,741	3.08%
Electronic Repairs	36,404	2.62%
Programming Logic	25,931	1.87%
Data Storage	24,004	1.73%
Communication and Collaboration	20,917	1.51%
Electronic Fundamentals	18,230	1.31%
App Development	17,985	1.30%
Digital Health and Safety	16,897	1.22%
Website Design	14,788	1.06%
Content Development	13,252	0.95%
Digital Marketing	12,495	0.90%
Object Oriented Programming Languages	12,161	0.88%
Front End Development	10,591	0.76%
Electronic Design	9,453	0.68%
Basic Digital Skills	8,508	0.61%
Cloud Computing	7,892	0.57%
Server Management and Security	7,746	0.56%
Cloud Software Development	7,040	0.51%
“Do it yourself” Culture	6,530	0.47%
Connectivity	5,815	0.42%
Back end Development	5,067	0.36%
Network Security	4,149	0.30%
Artificial Intelligence	1,213	0.09%
Blockchain	950	0.07%
Total Technology Sector Courses	492,784	35%

PROGRESS IN THE DIGITAL DIVIDE STRATEGY¹

	INTERNET ACCESS	DIGITAL ADOPTION	DIGITAL SKILLS AND DIGITAL EDUCATION
Total number of people directly benefited by the programs since they began	43,617,338	2,859	3,744,546
Number of people directly benefited by the programs during the reported year	252,377	1,500	565,821
Total number of employees volunteering in the programs since they began	189	1,180	5,988
Number of employees volunteering in the programs during the reported year	189	375	305

³ These programs are supported in most of our regions as part of our Corporate Citizenship Strategy.



# APPENDIX G: CORPORATE GOVERNANCE INDICATORS

(405-1)

América Móvil, S.A.B. de C.V. (“América Móvil”) is a Sociedad Anónima Bursátil de Capital Variable organized and established under Mexican law. Our shares are currently listed in Mexico, on the Mexican Stock Exchange (BMV: AMX) and in the United States, on the New York Stock Exchange (NYSE: AMX / AMOV).

According to the shareholding reports filed with the United States Securities and Exchange Commission (“SEC”), the following table identifies owners of more than 5.0% of any series of the Company’s shares as of March 31st, 2022.

SHAREHOLDER	SHARES OWNED (MILLIONS)	PERCENTAGE OF CLASS¹
<b>AA Series:</b>		
Family Trust²	10,894	53%
Control Empresarial de Capitales³	4,381	21.3%
Carlos Slim Helú	1,879	9.1%
<b>Series L:</b>		
Control Empresarial de Capitales⁴	6,318	14.6%
Family Trust⁵	6,849	15.9%
Carlos Slim Helú	3,322	7.7%
BlackRock, Inc.⁶	2,164	5.0%

¹ Percentage figures are based on the number of shares outstanding as of March 31, 2022.

² The Family Trust is a Mexican trust that holds AA Shares and L Shares for the benefit of members of the Slim Family. In addition to shares held by the Family Trust, members of the Slim Family, including Carlos Slim Helú, directly own an aggregate of 3,558 million AA Shares and 10,227 million L Shares representing 17.3% and 23.7%, respectively, of each series. According to beneficial reports filed with the SEC, none of these members of the Slim Family, other than Carlos Slim Helú, individually directly own more than 5.0% of any class of the Company’s shares.

³ Includes shares owned by subsidiaries of Control Empresarial de Capitales, formerly known as Inversora Carso. Based on beneficial ownership reports filed with the SEC, Control Empresarial de Capitales is a Mexican Sociedad Anónima de Capital Variable and may be deemed to be controlled by the Slim Family.

⁴ Includes shares owned by subsidiaries of Control Empresarial de Capitales, formerly known as Inversora Carso. Based on beneficial ownership reports filed with the SEC, Control Empresarial de Capitales is a Mexican Sociedad Anónima de Capital Variable and may be deemed to be controlled by the Slim Family.

⁵ The Family Trust is a Mexican trust that holds AA Shares and L Shares for the benefit of members of the Slim Family. In addition to shares held by the Family Trust, members of the Slim Family, including Carlos Slim Helú, directly own an aggregate of 3,558 million AA Shares and 10,227 million L Shares representing 17.3% and 23.7%, respectively, of each series. According to beneficial reports filed with the SEC, none of these members of the Slim Family, other than Carlos Slim Helú, individually directly own more than 5.0% of any class of the Company’s shares.

⁶ Based on beneficial ownership reports filed with the SEC.

 **FOR MORE INFORMATION ABOUT AMÉRICA MÓVIL AND ITS MAIN SUBSIDIARIES, AS WELL AS THE CORPORATE GOVERNANCE STRUCTURE AND HOW IT WORKS, PLEASE REVIEW OUR 2022 ANNUAL REPORT ON FORM 20-F, AVAILABLE AT AMÉRICA MÓVIL CORPORATE WEBSITE: [AMERICAMOVIL.COM](https://www.americamovil.com)**

At América Móvil, our corporate governance policies are supervised by the Board of Directors. In this manner, we ensure that the business is governed by our principles of ethics and transparency, while the decision-making process is based on our mission, vision, values, and philosophy. We adhere to all governance principles included in the following documents, applicable to our Board of Directors, our employees, and all parties related to América Móvil:

- Our bylaws;
- Our Code of Ethics;
- Our Corporate Governance Policies;
- Our Control Policies Applicable to Transactions Involving América Móvil’s Shares and other Securities issued by América Móvil;
- Mexican securities laws and regulations in all the international markets where our shares are traded, including the Mexican Securities Market Law (Ley de Mercado de Valores) the General Provisions applicable to securities issuers and other participants in the securities market (Disposiciones de carácter general aplicables a las Emisoras de valores y a otros participantes del mercado de valores), the internal regulation of the Mexican Stock Exchange (Reglamento Interior de la Bolsa Mexicana de Valores), and the Corporate Best Practices Code (Código de Mejores Prácticas Corporativas published by the Corporate Coordinating Council (Consejo Coordinador Empresarial); and,
- Applicable laws and regulations in every country where we operate.

At América Móvil, the Shareholders’ Meeting is our highest governing body. We hold ordinary and extraordinary meetings, where the summons are published at least 15 days in advance to ensure shareholders’ attendance. Extraordinary meetings are held to address specific issues such as extension of the duration or early dissolution of the Company, capital increase or reduction, change of corporate purpose, nationality or transformation of the Company, issuance of preferred shares, amendment of the Company’s bylaws, mergers, and divestitures, the cancellation of the registration of its shares in the Mexican Stock Exchange, or any other foreign stock exchange. All other matters must be addressed during ordinary shareholders’ meetings.

The Ordinary Meeting must be held at least once a year to discuss i) the approval of the financial statements of the previous year; (ii) appoint directors, determine their remuneration and analyze their independence; (iii) determine which members of the Board of Directors will participate in the Audit and Corporate Practices Committee; (iv) approve the amount that the Company will assign to the share buyback program; and v) determine the way in which the Company’s net profits will be allocated. Furthermore, any transaction that involves 20% or more of the Company’s consolidated assets must be approved by Shareholders’, including Series L.

At the Shareholders’ Meeting held on November 22, 2021, Claudia Jañez Sanchez and Gisselle Morán Jiménez were designated as independent members of our Board of Directors. At the Annual Ordinary Shareholders’ meeting held on April 20, 2022, the current members of the Board of Directors, the Executive Committee and the Audit and Corporate Practices Committee were reelected except for Mr. Arturo Elías Ayub, and the Corporate Secretary and the Corporate Pro Secretary were reappointed, with 12 directors elected by the AA Shares and A Shares voting together and two directors elected by the L Shares. It important to mention that 64% of the members of the Board of Directors are independent and 21% are women. Mr. Carlos Slim Domit is the Chairman of the Board and Mr. Patrick Slim Domit is the Vice Chairman; neither of them holds a management position in the Company.

The Board of Directors met six times in 2021, with an average attendance of 99%. Attendance at the last meeting of the year, during which the effectiveness of the Board was evaluated was 100%. To function properly, two auxiliary committees support the Board: The Executive Committee and the Audit and Corporate Practices Committee. In 2021, the Audit and Corporate Practices Committee met 7 times and had an attendance rate of 100%.



**FOR MORE DETAILED INFORMATION ON THE MEMBERS OF THE BOARD OF DIRECTORS, SEE OUR 2022 ANNUAL REPORT ON FORM 20-F AVAILABLE AT AMÉRICA MÓVIL CORPORATE WEBSITE: [AMERICAMOVIL.COM](https://www.americamovil.com)**



**OUR BYLAWS, CODE OF ETHICS, POLICIES AND PROTOCOLS ARE AVAILABLE AT AMÉRICA MÓVIL CORPORATE WEBSITE: [AMERICAMOVIL.COM](https://www.americamovil.com)**

## EXECUTIVE COMMITTEE

(102-18, 102-19, 102-20, 102-22)

The Executive Committee is currently comprised of Carlos Slim Domit, Patrick Slim Domit and Daniel Hajj Aboumrad. This body of the Board of Directors has the power to approve and offer opinions and options to the Board of Directors on certain matters specified in the Company’s bylaws.

## AUDIT AND CORPORATE PRACTICES COMMITTEE

(102-18, 102-19, 102-20, 102-22)

Our Audit and Corporate Practices Committee is comprised by independent members of the Board of Directors. The current members are Ernesto Vega Velasco who is the Chairman, Rafael Moisés Kalach Mizrahi and Pablo Roberto González Guajardo, all of them are independent directors.

The mandate of the Audit and Corporate Practices Committee is to assist our Board of Directors in supervising our operations, establishing and monitoring procedures and controls in order to ensure that the financial information we distribute is useful, appropriate, reliable, and accurately reflects our financial position. In particular, the Audit and Corporate Practices Committee is required to, among other things, (i) call shareholders’ meetings and recommend items to be included on the agenda, (ii) advise the Board of Directors on internal control procedures, related party transactions that are outside the ordinary course of our business, succession plans and compensation structures of our key executives, (iii) select and monitor our auditors, (iv) discuss with our auditors the procedures for the preparation of the annual financial statements and the accounting principles for the annual and the interim financial statements and (v) obtain a report from our auditors that includes a discussion of the critical accounting policies used by us, any alternative accounting treatments for material items that have been discussed by management with our auditors and any other written communications between our auditors and management.

The Company is required to make public disclosure of any Board action that is inconsistent with the opinion of the Audit and Corporate Practices Committee. In addition, pursuant to our bylaws, the Audit, and Corporate Practices Committee is in charge of our corporate governance functions under the Mexican securities laws and regulations and is required to submit an annual report to the Board of Directors with respect to our corporate and audit practices. The Audit and Corporate Practices Committee must request the opinions of our executive officers for purposes of preparing the annual report.



Also, América Móvil is required to file annual reports on the main activities of the Board of Directors and the Audit and Corporate Practices Committee to the US Securities and Exchange Commission (SEC), and to the Mexican Stock Exchange, which publishes the mentioned reports on its websites. Our Internal Audit area is responsible for carrying out three main types of audits:

1. a Risk Management Audit that reviews several operational processes, as well as the integrity of our operations. The main goal is to evaluate how they are working (evaluating 100% of the operations at least once every two years);
2. an Audit to comply with the requirements of the Sarbanes-Oxley Act to ensure that our Internal Control over Financial Reporting (ICFR) is accurate (The review is also carried out by a third party on an annual basis and covering 100% of the ICFR process); and
3. Special Audits, whose objective is to offer support to different areas within the Company for reviews of a specific process or activity.

## WHISTLEBLOWER PORTAL - INTEGRITY AND COMPLIANCE PROGRAM

(102-17)

During 2021, a total of 344 people were appointed for the investigation process of the complaints presented on the América Móvil Whistleblower Portal. The number of complaints received by country and information related to them is presented in detail below. The inadmissibility of some complaints was due to several reasons, among which we can mention duplication of complaints, complaints that were not related to the Company and complaints whose nature did not alter the Integrity and Compliance Program.

COUNTRY/REGION <sup>1</sup>	COMPLAINTS RECEIVED	ACCEPTED COMPLAINTS VALID	TOTAL NUMBER OF PEOPLE INVOLVED IN THE INVESTIGATION PROCESS <sup>2</sup>
Mexico	493	144	88
Brazil	1,200	343	26
Colombia	2,300	198	37
Southern Cone	721	60	47
Andean Region	406	36	52
Central America	380	35	57
Caribbean	372	53	37
United States	5	0	-
Europe	2	0	-
Total	5,879	869	344

<sup>1</sup> It includes only the complaints received through América Móvil's Whistleblower Portal.

<sup>2</sup> Total number of people involved in the investigation process includes members on the Ethics Committee of América Móvil.

Corrective measures for those employees involved in complaints resulting in a violation of the América Móvil Code of Ethics include programs designed to improve conduct, training on ethical behavior and monitoring by the subsidiaries' human resources area. In addition, disciplinary, administrative, and legal sanctions are imposed, and controls are implemented to avoid further violations of the Integrity and Compliance Program. During 2021, from the complaints deemed as valid 0.17% of employees received an administrative sanction and 0.10% received a high disciplinary measure, that could even lead to job termination.



ACCESS OUR WHISTLEBLOWER PORTAL [HERE](#).



SUPPLY CHAIN MANAGEMENT

(102-9)

Our supplier classification is based on the following criteria:

- 1. Identification of Critical Suppliers:** They are those active suppliers that are fundamental to our business for the goods or services they supply to the company, either:
- a.** Provider of goods/services to the client: it is the provider of goods (phones, tablets, devices, accessories, modems, etc.) or services (installation, attention, operation, maintenance) for clients/end users.
  - b.** Non-Replaceable Provider: is the one that cannot be easily replaced by another one.
  - c.** Critical Component Provider: is that business partner that provides essential goods or services for the continuity of operations.
  - d.** Lobbying or Management Agencies with Third Parties and/or Construction Companies: are those that carry out activities or relationships with authorities, communities, civil society organizations, among others on behalf of the Company that could generate significant risks, mainly in matters of corruption.

- 2. Risk suppliers:** They are those active suppliers that, by not incorporating the best practices in matters of human rights, care for the environment and prevention of money laundering, could represent a risk to the reputation of our company.

- a.** Risk suppliers in the matters of human rights considering their management of:
  - Health and safety;
  - labor;
  - privacy of communications; and,
  - conflict zones.
- b.** Environmental risk suppliers considering their management of:
  - Water;
  - emissions;
  - waste; and,
  - biodiversity.
- c.** Risk providers in matters of money laundering and financing of illegal activities: they are those whose geographic operation are in the countries of the FATF lists.

Of the total number of suppliers evaluated in 2021, 26% were identified as critical for providing a good or service that has direct contact with the customer, for being non-substitutable, for providing essential component, or for having contact with our stakeholders’ on behalf of the Company. On the other hand, around 4% were identified as suppliers with a high sustainability risk that may represent a risk to América Móvil’s reputation.

COMMERCIAL INTEGRITY POLICY

Suppliers, customers, retailers, business partners, contractors, consultants, agents, and those who do business with América Móvil entities around the world are expected to follow América Móvil’s Policies and conduct business with integrity, honesty, and transparency. For this reason, we request that all our business partners respond to our self-assessment questionnaire and commit to aligning with América Móvil’s policies.

Since 2019, 79% of our main suppliers and retailers have been required to align with this Policy, and adherence is a mandatory requirement for new business partners.

SUSTAINABILITY CLAUSE IN SUPPLIER CONTRACTS

For several years’ we have included a sustainability clause in our contracts with suppliers that address environmental management, the protection of human and labor rights of their employees, as well as the legality of the inputs they use to manufacture their products, ensuring that their materials do not come from conflict zones. Currently, more than 85% of our global mobile device suppliers have signed contracts that include our sustainability clause.

(204-1)

PERCENTAGE OF LOCAL SUPPLIERS

COUNTRY / OPERATION	PERCENTAGE OF LOCAL SUPPLIERS WITHIN OUR SUBSIDIARIES
Telcel	94%
Telmex	88%
AMCO	82%
Global Hitss	85%
Telvista	95%
Brazil	98%
Colombia	100%
Guatemala	64%
Costa Rica	63%
El Salvador	17%
Honduras	42%
Nicaragua	63%
Argentina	90%
Uruguay	88%
Paraguay	78%
Chile	60%
Peru	89%
Ecuador	72%
Puerto Rico	52%
Claro Dominicana	83%
Austria	68%
Belarus	92%
Bulgaria	84%
Croatia	68%
Macedonia	58%
Serbia	85%
Slovenia	85%
Total	80%



TAX CONTRIBUTIONS

(207-1, 207-4)

EFFECTIVE TAX RATE

In 2021, América Móvil accrued MX 28,144 million in corporate income taxes on a consolidated basis. This amount corresponds to an effective tax rate of 27.4% on our worldwide earnings. In 2020, AMX accrued corporate taxes amounted to MX 13,509 million which represented an effective tax rate of 28.4%. The decrease in the effective tax rate was due to the recognition of tax losses from prior years in some countries and to the impact of a lower inflation rate given the inflationary adjustments applicable on our financial assets and liabilities under Mexican Tax Law.



TO LEARN MORE ABOUT OUR TAX POLICY,  
PLEASE VISIT AMÉRICA MÓVIL'S CORPORATE  
WEBSITE: [AMERICAMOVIL.COM](https://www.americamovil.com)

TAXES PAID BY COUNTRY 2020<sup>1</sup>

COUNTRY	2020 REVENUES (MXP)	ACCOUNTING PROFITS (LOSSES) BEFORE INCOME TAX FOR THE FISCAL YEAR	2020 PAID TAXES (MXP)	2020 ACCRUED TAX (MXP)	NUMBER OF EMPLOYEES
Argentina	44,901,449,266	-1,304,082,848	275,506,887	278,307,342	3,770
Austria	38,704,352,328	-860,899,355	255,178,033	119,045	7,686
Belarus	4,882,738,607	1,143,688,805	218,807,317	197,852,108	2,385
Brazil	161,620,638,179	25,940,459,792	1,233,788,080	1,234,684,027	35,777
Bulgaria	6,542,168,738	1,012,508,945	76,721,907	86,330,132	3,329
Chile	22,051,715,892	-338,229,205	3,060,745	25,310,714	3,216
Colombia	78,629,555,894	8,941,774,089	1,513,780,767	1,513,780,767	9,085
Costa Rica	5,630,586,773	-91,333,026	0	0	726
Croatia	5,370,428,857	458,506,304	98,281,258	92,784,435	1,872
Dominican Republic	19,783,841,392	6,857,912,370	1,774,471,150	1,774,471,150	7,787
Ecuador	23,244,731,810	3,792,415,339	1,457,210,865	1,457,210,865	2,815
El Salvador	9,787,773,144	1,976,914,013	712,752,212	712,752,212	2,000
Guatemala	24,719,744,544	5,816,664,495	979,920,259	979,920,259	3,813
Honduras	5,452,809,482	-535,066,451	98,914,977	139,175,045	952
Macedonia	1,531,343,048	155,183,683	20,458,469	22,888,609	776
Mexico	691,980,175,736	296,420,960,079	19,499,872,678	19,703,655,868	88,172
Nicaragua	6,360,933,121	1,721,392,325	535,498,830	535,498,830	1,893
Panama	3,543,986,928	-667,318,196	0	15,789,503	552
Paraguay	3,496,063,709	-544,105,125	987,416	0	467
Peru	36,856,644,421	4,751,043,721	792,402,880	792,402,879	3,846
Puerto Rico	22,311,341,265	-5,008,676,329	0	0	2,860
Serbia	3,590,831,501	395,604,365	0	46,270,138	1,370
Slovenia	2,571,547,147	1,016,057,346	62,905,117	44,620,582	532
United States	190,165,627,885	11,921,852,939	3,234,148,936	3,489,605,770	843
Uruguay	1,915,618,372	-43,336,770	79,716	0	268
Other Countries	24,674,550,864	35,848,057,869	4,358,497,407	4,358,286,762	
Total	1,440,321,198,904	398,777,949,175	37,203,245,905	37,501,717,041	186,791

<sup>\*</sup> In case of loss, we do not report taxes.  
<sup>1</sup> The table shows taxes paid by country in 2020 compared with 2019.

CONTRIBUTIONS

(415-1)

During the year, América Móvil’s operations made contributions and expenses for lobbying, representation of interests or similar, as well as for commercial associations or tax-exempt groups.

It is important to specify that our Integrity and Compliance Program specifically prohibits spending on political contributions. We do not make monetary contributions to political campaigns or organizations, lobbyists, trade associations and other tax-exempt groups with the intention of influencing campaigns or legislation.

However, we carry out annual payments, derived from our affiliation with business chambers such as ANATEL and GSMA; as well as other industrial chambers in which we participate in the countries in which we operate.

Our subsidiary Claro Puerto Rico carries out lobbying investments to monitor bills that may arise in the Legislature with the potential to become law, thus helping us in their relationships to participate in different ways along with the industry in these legislative processes to bring the company’s position, either for or against these measures. It is important to reiterate that these contributions were not intended to influence public policy.

TYPE OF CONTRIBUTION <sup>1</sup>	2021 (MXP)	2021 (USD)
Lobbying, representation of interests or similar <sup>2</sup>	\$3,284,851	\$162,000
Local, regional, or domestic political campaigns / organizations / candidates	0	0
Business chambers or tax-exempt groups (For example, think tanks)	\$96,368,079	\$4,752,614
Others (for example, expenses related to electoral measures or referendums)	0	0
Total Contributions	\$99,652,931	\$4,914,614

<sup>1</sup> Does not include Telmex and TracFone, the latter is no longer part of América Móvil.

<sup>2</sup> The total amount corresponds to Claro Puerto Rico.



# APPENDIX H: CONTROVERSIES AND FINES

## CONTROVERSIES

(206-1)

### 1. “MXN 8.29 billion tax evasion in Mexico”

*In June 2020, Mexico’s Federal Tax Administration (SAT) reported that it has recovered MXN 8.29 billion (USD 446 million) in tax debt from América Móvil from 2016 to 2019. The Tax Authority’s announcement follows SAT’s system reform to crack down tax evasion and the series of tax claims against companies that operate in Mexico.*

#### CONTEXT:

In 2014, the Mexican Tax Authority (SAT) implemented the “Optional Regime for Groups of Companies”, which allows to defer, for each of the companies that make up the group, and for up to three years, or sooner if certain assumptions are made, the income tax that results from considering the determination of the individual income tax derived from recognizing, indirectly, the tax losses incurred by the companies in the group for the year in question. If a conglomerate, in accordance with its interests decides to abandon the Optional Regime for Groups of Companies, it has the obligation to pay the pending deferred income tax amount in the month following notification to the authority.

#### AMÉRICA MÓVIL’S CASE

We reiterate that this is not a penalty. As of fiscal year 2014, América Móvil, SAB de CV (AMX) chose to pay taxes for income tax purposes (ISR), in accordance with the Optional Regime for Groups of Companies. On December 19, 2019, América Móvil as integrating company, submitted to the Mexican Tax Authority, the notice to no longer belong under the Optional Regime for Groups of Companies, which implied, to pay in January 2020, the pending deferred income tax for the years 2016-2018. Therefore, from the year 2020, the group will be taxable under the General Regime for Legal Companies.

In order to formally proceed with the communication of this decision to the Mexican Tax Authority and in accordance with the law, we presented the “Notice to end to belong under the Optional Regime for Group of Companies”, as of January 1, 2020. In this notice, we indicated the 66 companies that would no longer be considered under this regime as well as the amount of the pending deferred income tax to be paid by each one of them.

On January 20, 2020, the Mexican Tax Authority requested AMX to provide information on the calculation of the deferred income tax in order to clarify and validate the amount to be paid the following month. During this period, as part of the process, we worked closely with the Mexican Tax Authority to calculate the final amount adjusted according to inflation. Following this process, the Mexican Tax Authority issued a statement confirming the amount to be paid by AMX.

On January 30, 2020, AMX filed the detail on how the group’s integrated companies, headed by América Móvil, would pay the adjusted deferred income tax as of January 31 of the same year.

Therefore, as already indicated, we paid the deferred income tax due to the shift from the Optional Regime for Groups of Companies, and not due to a tax correction or evasion, as it has been wrongly stated.

Derived from this payment, on February 17, 2020 the SAT issued a press release referring to the fact that the Tax Authority invited a large telecommunications company to provide information on the fiscal years 2016 to 2019 and because of the collaboration with said company; it paid an approximate amount of 8.2 billion Mexican pesos. The release made by the Tax Authorities is inaccurate, as payment was the result of a voluntary change in tax regime. América Móvil issued a public statement to clarify such inaccuracies.

América Móvil has duly reported this information in accordance with applicable law at its Audited Consolidated Financial Statements as well as under the 1Q19 Quarterly Report section published on its website.

## 2. “Brazil: Potential regulatory penalties over alleged involvement in cartel conduct for public tenders”

*In March 2021, the General Superintendence (SG) of the Administrative Council for Economic Defense of Brazil (CADE) recommended that telecommunications companies: Claro, Oi and Telefonica Brasil (Vivo) be penalized for engaging in cartel conduct in public tenders for internet service contracts. The CADE investigation was initiated following a complaint alleging that the companies acted in consortium to limit competition between themselves, particularly for an auction held by the Post Office in 2015. The SG recommended penalties of 4% to 5% of the companies’ 2016 gross sales from the telecommunications market. The recommendation was still subject to approval by CADE’s board.*

### CONTEXT:

The Brazilian Competition Law (Law No. 12,529/2011) establishes in article 90, that consortiums that participate in public bids are exempted of merger control.

The Administrative Proceeding No. 08700.011835/2015-02 was initiated by the Administrative Council for Economic Defense (“CADE”) on August 25, 2017, based on a Complaint filed by British Telecom do Brasil (“BT”) against Claro S/A (“Claro”), Oi Móvel S/A (“Oi”) and Telefônica Brasil S/A (“Telefônica”, together with Claro and Oi, “Defendants”). The Proceeding investigates alleged anticompetitive practice in public bid No. 144/2015 from Empresa Brasileira de Correios e Telégrafos - ECT, an entity of the Brazilian Public Administration. More specifically, the alleged conducts would involve: (i) collusion through a Consortium to refrain competition in public bids, causing harmful effects to the telecommunications sector; and (ii) adoption of unilateral conducts (refusal to deal and price discrimination) to prevent BT from participating in the referred bid.

### AMÉRICA MÓVIL’S CASE

On March 9, 2021, the SG at CADE issued a non-binding opinion recommending fines against Claro, Oi and Telefônica. The recommendation relates to a complaint filed by BT against the Defendants alleging, among other things, that, in connection with a public bid, the Defendants (i) colluded to prevent competition between the leading players in the broadband internet services market in Brazil, which caused anti-competitive effects in the telecommunications sector and (ii) made it difficult for BT to participate in the bid through price discrimination tactics and by refusing to supply communication circuits (specifically, MPLS links) that were required for BT to participate in the bid.

On May 11, 2022, CADE made public the imposition, in a non-unanimous ruling, of a fine of BRL 395 million (US\$ 77 million approximately) against Claro; BRL 266 million (US\$ 52 million approximately) against Oi; and

BRL 121.7 million (US\$ 23.8 million approximately) against Telefónica for the formation of the Consortium to participate in Bid No. 144/2015. Claro became aware of the ruling and is waiting for formal notification to access the full content of the decision and challenge the resolution in all administrative and judicial instances.

## 3. “Mexico: MXN 1.3 billion penalty set by telecom regulator for alleged noncompliance with regulations regarding information sharing of Teléfonos de Noroeste subsidiary”

*In January 2020, America Movil, S.A.B. de C.V. declared in a regulatory filing that the company’s subsidiary, Teléfonos del Noroeste received a penalty of MXN 1.3 billion (approximately USD 69.7 million) from Mexico’s Federal Telecommunications Institute. According to America Movil, the penalty was imposed for its alleged failure to share information about availability of telecom infrastructure. The company said it would explore legal options to challenge the regulatory sanction.*

### CONTEXT:

In February 2017, the Mexican Telecommunications Regulator (IFT) issued a new preponderance measure according to which Telnor has to make available in the Electronic Managing System or “Sistema Electrónico de Gestión” (SEG) some infrastructure information regarding certain telecom passive infrastructure such as “poles”, as follows: (i) 60% on September 30, 2017; (ii) 75% on April 30, 2018; (iii) 90% on September 30, 2018; and (iv) 100% on June 2nd, 2019.

In October 2017, IFT carried out an inspection to Telnor and detected that on its website [www.telnor.com](http://www.telnor.com) (not in the SEG) 1 pole (out of 83,279), and 1 well (out of 26,955) had no information. Therefore, in March 2018, the IFT opened a sanction procedure Vs. Telnor for the violation of such preponderance measure.

In 2020, IFT imposed a fine of \$1.3 billion MXN that was paid and challenged before judicial courts.

### AMÉRICA MÓVIL’S CASE

Telnor filed a constitutional appeal to challenge the fine alleging: i) Telnor complied with the legal obligation of making available passive infrastructure (poles, wells) information in SEG used for providing wholesale services; ii) in conducting the administrative process, due process was not followed by IFT; iii) the fine is arbitrary, illegal and disproportionate; iv) prior to the start of the process IFT issued a “Statistical Sampling Methodology to be used to verify Telnor obligations in SEG”, such Methodology showed that the number of collected cases as incriminatory evidence was not representative to rule a breach.

Evidence stage in process, resolution still pending.



#### 4. “Mexico: MXN 1.4 Billion Penalty Over Unpaid Taxes; Appeal Ongoing”

*The Tax Administration System of Mexico, Servicio de Administracion Tributaria (SAT), imposed a penalty of MXN 1.4 billion (approximately USD 87 million) on America Movil subsidiary Sercotel. The SAT alleged that Sercotel was unable to pay taxes due to the transfer of accounts from another America Movil subsidiary in 2012. In April 2019, America Movil stated that the company challenged the penalty imposed by the SAT and the challenge is currently pending. In addition, the company expected the SAT to impose additional penalties amounting to MXN 2.75 billion (approximately USD 170.6 million) related to the alleged unpaid taxes.*

##### CONTEXT:

Due to a corporate restructuring performed in 2005, Sercotel carried out various transactions with related parties. In this regard, on March 14, 2012, the SAT issued a resolution adjusting the prices agreed by Sercotel in connection with such transactions from an arm’s length perspective and as a consequence, the tax authority determined an adjustment of Sercotel’s tax loss for the 2005 fiscal year from MXN 42 billion to MXN 33 billion and imposed a penalty against the company of MXN 1.4 billion (the “Penalty”).

The SAT also determined an additional tax assessment to América Móvil of MXN 500 million as the head of the tax consolidation regime by reason of the Penalty (individually the “Tax Assessment” and jointly the “Tax Assessment & Penalty”).

##### AMÉRICA MÓVIL’S CASE

On May 23, 2012, Sercotel challenged the Penalty through an administrative appeal before the SAT. As such appeal was not solved within the time provided by law and therefore, the Penalty was legally understood as confirmed, on July 7, 2014, Sercotel filed a claim for annulment before the Federal Administrative Court. América Móvil challenged the Tax Assessment through a claim for annulment filed on February 26, 2015. Both claims were solved on October 3, 2018, by the Federal Administrative Court which recognized the validity of the Tax Assessment & Penalty.

On February 20, 2019, Sercotel and América Móvil filed an injunction against the judgement issued on October 3, 2018. On September 26, 2019 the competent court ruled in favor of Sercotel and América Móvil and ordered the Federal Administrative Court to issue a new judgment by which the Tax Assessment & Penalty shall be declared null and void.

Due to the foregoing, the SAT filed an appeal for review against said protective resolution which was sent to the Supreme Court of Justice of the Nation for study and resolution; nevertheless, such appeal was dismissed.

#### CASE RESOLUTION

In compliance to the ruling issued in favor of Sercotel and América Móvil, the Federal Administrative Court issued a new judgment declaring the Tax Assessment & Penalty to be null and void, which was declared as final and non-appealable on April 20, 2021, solving the case definitively in favor of Sercotel and América Móvil.

#### 5. “TracFone Wireless: USD 6 million FCC penalty proposed over alleged breach of subsidy program”

*In April 2020, the Federal Communications Commission (FCC) proposed a penalty of USD 6 million against TracFone Wireless, a subsidiary of America Movil, S.A.B. de C.V., over alleged breach of subsidy program. According to the regulator, the company claimed federal Lifeline funding, which was designed to low-income users, for customers who were not eligible for the program.*

##### AMÉRICA MÓVIL’S CASE

Verizon Communications acquired TracFone Wireless Inc. (TracFone) a telecommunications carrier based in Miami, from América Móvil in November 2021, with TracFone continuing as a wholly-owned subsidiary of Verizon. On March 4, 2022, TracFone agreed to pay certain amounts as part of a civil settlement to resolve allegations that TracFone signed up ineligible customers in connection with the Federal Communications Commission’s (FCC) Lifeline Program (Lifeline). The claims resolved by the settlement are allegations only, and there has been no admission of liability by Tracfone.

The United States alleged that TracFone impermissibly signed up more than 175,000 subscribers who were ineligible for the program. TracFone hired independent third-party sales agents, to enroll these customers. These agents learned that TracFone’s computer software contained a glitch that allowed ineligible persons to enroll in Lifeline. Some agents in Florida then exploited the glitch to increase their consumer enrollments and commission payments.

Under the settlement, TracFone paid \$2.5 million in damages to the Government. Further, TracFone agreed to enter into a corporate compliance plan with the FCC. The compliance plan requires TracFone to modify its business practices to ensure compliance with the FCC’s rules for the Lifeline Program and obligates Verizon to oversee and audit Tracfone’s Lifeline program.

Based upon TracFone’s disclosure, assistance with the government’s investigation, and early repayment in connection with the allegations, TracFone also received a credit for cooperation in connection with the settlement.

## 6. “Telmex Colombia and Telmex Telecomunicaciones”

*In November 2013, Colombia’ competition regulator, the Superintendency of Industry and Commerce (SIC), ordered two of America Movil’s subsidiaries, Telmex Colombia and Telmex Telecomunicaciones, to pay the maximum penalty of COP 1.18 billion (approximately USD 614,000) each, for “repeatedly and systematically” failing to address customer complaints. The penalty was subject to appeal.*

### CONTEXT:

On April 2, 2012, a complaint was filed before the SIC, for non-compliance by Telmex Colombia and Telmex Telecomunicaciones of the rules on reception and processing of user’s petitions, consumer’s complaints and claims, especially referring to receiving, attending, processing, and responding in a timely and substantive manner. Based on the above, the SIC initiated the corresponding administrative investigations. The legal basis was the non-compliance with Articles 3 and 39 of Resolution 3066 of 2011 and Articles 3 and 72 of CRT Resolution 1732 of 2007 (regulations in force at the time of the facts).

### AMÉRICA MÓVIL’S CASE

On December 5, 2013, Telmex Colombia and Telmex Comunicaciones filed a comprehensive appeal before the SIC. Finally, the SIC resolved through Resolution 294 of January 8, 2015, confirming the decision and the penalty imposed. Telmex Colombia and Telmex Telecomunicaciones paid the amount indicated by the SIC, putting an end to this process.

## 7. “Peru: PEN 2.7 million penalty over alleged mobile portability regulations violation”

*In June 2020, Peruvian telecommunications services regulator Osiptel issued a PEN 2.7 million (approximately USD 775,177) penalty against America Movil, S.A.B. de C.V. over alleged violation of mobile portability regulations and failure to activate lines with biometric verification.*

### CONTEXT:

Osiptel fined America Movil Peru (Claro) (not América Móvil S.A.B. de C.V.) and Telefonica del Peru (Movistar) with a total of PEN 3.7 million (EUR 940,000) for breaches of mobile portability and other rules. Claro received a fine of PEN 2.7 million (EUR 680,000) for failing to comply portability regulations and for activating more than a dozen lines without performing biometric verification.

### AMÉRICA MÓVIL’S CASE

This refers to two separate cases:

**Case 1:** Peruvian regulator (Osiptel) imposed a fine of USD\$477,000 for the failure to comply with portability procedures when rejecting portability applications. Likewise, Claro was sanctioned for extemporary information submission on mobile lines that were impeded to change operator. Sanction was judicially challenged and is pending resolution.

**Case 2:** Osiptel imposed a fine of USD\$370,000 for selling mobile lines without proper use of Biometric Verification System on customers having ten or more lines. Likewise, Claro was sanctioned for failure to comply the procedures regarding the lack of consent of the owners of the lines. Sanction was judicially challenged and is pending resolution.



## 8. 28/10/2020 - Claro Colombia, owned by America Movil, fined COP 983 million (USD 258,000) for violating its users’ right of free choice to terminate their contract.

### CONTEXT:

In October 2020, the Colombian competition authority, the Superintendency of Industry and Commerce (SIC), imposed Comunicación Celular S.A. Comcel S.A. (Claro Colombia) a penalty of COP \$983.000.000 (USD 256,000 approximately), for not allowing consumers to terminate their contracts, and charging the value of the services after submitting the termination request.

### AMÉRICA MÓVIL’S CASE

Comcel informed its users the different ways on which contract termination can be filed and developed different strategies to facilitate the contracts terminations.

Comcel filed a motion for reconsideration before the SIC, resolution is still pending.

## 9. 25/10/2021 - Claro Colombia, owned by America Movil, fined COP 950 million (USD 247,000) for marketing breach.

### CONTEXT:

In October 2021, Colombian competition authority, the Superintendency of Industry and Commerce (SIC), imposed Comunicación Celular S.A. (Claro Colombia) a penalty of COP \$950.000.000 (USD 240,000 approximately) for breaching the Law 1581 of 2012 (Personal Data Protection Law or “PDPL”, for using an application to take phone numbers from other operators to develop telemarketing sales.

The PDPL prohibits the use of personal information without prior authorization. Also, it mandates to duly inform about the purpose for which the personal data will be used; and to keep a copy of the respective authorization granted by the holder of the personal data.

### AMÉRICA MÓVIL’S CASE

Claro Colombia contested the decision alleging that it has used certain information contained in the Portability Data Base “PDB” of the Ministry of Telecommunications and Technology “MinTic” for marketing purposes, and that such information cannot be considered as personal data, as it does not even contain the name of the number holders.

On November 12, 2021, Claro Colombia filed a Reconsideration and Appeal. Resolution is still pending.

## 10. 08/11/2021 - Claro, owned by America Movil, fined PEN 2.6 million (USD 650,000) for a series of regulatory breaches in Peru.

### CONTEXT:

On November 5, 2021, the Peruvian regulator (OSIPTEL) confirmed several fines to America Movil Peru (Claro Peru) (totaling approximately USD 750,000) for failing to comply with some Quality-of-Service indicators of mobile services on rural cities of Peru.

### AMÉRICA MÓVIL’S CASE

Claro Peru challenged the fine before the courts on February 04, 2022 and it is still pending resolution.

## 11. 25/04/2022 - Claro, owned by America Movil, fined BRL 600,000 (USD 119,674) by Brazil’s regulator for cutting internet access to customers.

### CONTEXT:

In 2020, SENACON (Consumer’s National Secretariat – a branch of the Justice Ministry) fined Claro for R\$ 800,000.00 (USD 167,000 approximately), due to interrupting consumers’ mobile internet access after the full consumption of the contracted mobile data packages. Claro filed an appeal and, in 2022, SENACON decided to reduce the fine to the amount of R\$ 600,000.00 (USD 125,000 approximately). However, Claro still intends to contest the fine before judicial courts.

### AMÉRICA MÓVIL’S CASE

The subject dates back to 2014, when Claro adopted the interruption of access practice described above. Up until then, the standard practice was to reduce the connection speed after reaching the contracted amount of data. Such change of practice was preceded by campaigns to make consumers aware of its mobile data packages, including sending SMS informing the expiry date of the contracted offers. This practice was validated by Anatel, which did not verify any irregular conduct. Other mobile phone companies adopted similar practices and were also fined by SENACON.

## 12. “Share repurchase authorization of up to MXN 25 billion”

*27 Apr 2021: America Movil shareholders approve MXN 0.40 dividend and MXN 25 bln buyback programme.*

### AMÉRICA MÓVIL’S CASE

Please take note that this is not a penalty or fine. The information refers to the approval by the shareholders of AMX to separate a portion of its profits in the corresponding fiscal year to have such amounts available for the repurchase of its own shares, to the extent AMX decides to repurchase shares as part of its strategy. Share repurchases are reported daily to the stock exchange. Please note that share repurchase programs are regulated under applicable law and are a common feature for companies listed in stock exchanges in Mexico and abroad.

## 13. “Additional share repurchase authorization of up to USD 299 million”

*09 Feb 2021: Mexico’s America Movil to add nearly \$300 mln for share buybacks.*

### AMÉRICA MÓVIL’S CASE

Please take note that this is not a penalty or fine. The information refers to the approval by the shareholders of AMX to separate a portion of its profits in the corresponding fiscal year to have such amounts available for the repurchase of its own shares, to the extent AMX decides to repurchase shares as part of its strategy. Share repurchases are reported daily to the stock exchange. Please note that share repurchase programs are regulated under applicable law and are a common feature for companies listed in stock exchanges in Mexico and abroad.

## SIGNIFICANT FINES

(307-1, 419-1)

During 2021, Claro El Salvador received 2 fines worth 1.5 million dollars from the federal tax authority, which were imposed for not having provided information on data reports, background information or supporting documents that were required by the Tax Administration during auditing processes to CTE Telecom Personal S.A. De C.V., regarding income tax (ISR) for the 2007 fiscal year; as well as value added tax (VAT) from July 1st to December 31st, 2009. The financial area modified its practices regarding the delivery of documentation required in audit processes for the following years.

Claro Perú paid fines that amount 9.1 million dollars to Peruvian Tax Authorities. Despite being appealed in court, the fines have been paid to avoid moratorium interests. The cases are the following:

1. CLARO Peru entered into an equipment lease agreement with Arrendadora Móvil, a Chilean company. It should be noted that Peru has an international double taxation avoidance agreement with Chile. According to this agreement, to which Claro Peru applied, CLARO was only required to withhold income tax of 15% of the leasing income and pay such tax to the Peruvian tax authorities. However, in a subsequent audit, SUNAT disregarded the beneficial ownership of Arrendadora Móvil Chile, indicating that it is not a company capable of paying the international equipment leasing operation and therefore indicated that the agreement to avoid double taxation is not applicable and that Claro Peru should have withheld 30% as income tax and not 15%. In view of this, CLARO Peru has filed a contentious-administrative lawsuit. This process is being heard in court and for this reason another file has been created in which the plaintiff is CLARO. This same claim can be found in 2010, 2011, 2012 and 2013. Since 2014 Claro Chile has absorbed Arrendadora, so SUNAT does not continue to address this issue to date.
2. The second fine is related to the findings of a SUNAT audit of 2009 Income Taxes for the provision for doubtful accounts receivable (PCD), cost of sales that do not correspond to the year, deduction of intangible assets not accepted since they have been fully amortized for accounting and tax purposes, excess due to exchange difference, and expenses that qualify as a donation. The objections are being discussed in court, where we maintain a possible risk. In this sense, another file has been created in this instance where the plaintiff is CLARO. In this regard, it should be noted that the Finance area has been implementing a Tax Project, which consists of gathering all the supporting information of the Company’s operations in order to have it available in the event of a SUNAT audit. Likewise, it should be noted that the project covers all these issues, particularly PCD tracking, so that in subsequent years the claims should be reduced.





# APPENDIX I: CERTIFICATIONS

OPERATION	CERTIFICATION
Telcel	ISO 9001:2015
	ISO/IEC 27001:2013
	ISO/IEC 20000-1: 2018
	ISO 45001:2018
	LFPDPPP (Esquema de autorregulación vinculante para la Protección de Datos Personales )
Telmex	ANSI/TIA-942-B:2017
	Avaya Diamante
	AWS Advanced Consulting Partner
	AWS Public Sector Partner
	Calidad Ambiental Nivel de Desempeño Ambiental 2
	Cisco Advanced Collaboration Architecture
	Cisco Advanced Data Center
	Cisco Advanced Enterprise Networks Architecture
	Cisco Advanced Security
	Cisco Collaboration Saas Authorized
	Cisco Customer Experience Specialized
	Cisco Enterprise Agreement for Data Center Choice
	Cisco Enterprise Agreement for Security
	Cisco Gold Integrator
	Cisco Gold Provider
	Cisco Master Security Specialized
	Cisco Multinational Certified
	Cisco Powered validated Service for Infraestructure as a Service
	Cisco Powered validated Service for Managed SD - WAN
	Cisco Powered validated Service for UC as a Service based on HCS
	Cisco Registered Partner

OPERATION	CERTIFICATION
Telmex	Cisco Unified Contact Center Enterprise
	Dell Gold Partner
	Dictamen ISO/IEC 38500 (documento no caduca)
	Dictamen NFPA75
	Empresa Socialmente Responsable
	Genesys Cloud Reseller
	Google Cloud Partner Advantage
	HPE Gold Partner
	Huawei Enterprise Channel Certified Service Partner Data Communication
	Huawei Enterprise Cloud Communications
	Huawei Partner Autorizado
	ICREA N3
	ICREA N5
	ISO 14001: 2015
	ISO 18788: 2015
	ISO 22301: 2019
	ISO 27001:2013
	ISO 27002: 2013
	ISO 27005: 2018
	ISO 27017: 2015
	ISO 27018: 2014
	ISO 31000: 2018
	ISO 37001: 2016
	ISO 9001: 2015
	ISO 9001:2015
	ISO/IEC 20000-1: 2018
	ISO/IEC 27001-1: 2013



OPERATION	CERTIFICATION
Telmex	Juniper Authorized Reseller
	LFPDPPP Ley Federal de Protección de Datos Personales en Posesión de Particulares
	Microsoft Gold Cloud Platform
	Microsoft Gold Cloud Productivity
	Microsoft Gold Partner Cloud Platform
	Microsoft Gold Partner Data Center
	Microsoft Gold Partner Small and Midmarket Solutions
	Microsoft Silver Data Center
	Microsoft Silver Small and Midmarket Cloud Solutions
	Norma Mexicana para la Igualdad Laboral y No Discriminación
	Oracle Partner Network Member
	PCI DSS
	Reporte SOC I tipo 2 / ISAE 3416 / SSAE 18
	Reporte Tipo II ISAE 3402 /SOC 1
	Reseller Hardware Direct IBM
	SAP Certified in HANA Operations Services
	SAP Cloud and Infraestructure
	SAP Hosting Operations
	Sell Expertise in NAS Storage
	Sell Expertise in Oracle E-Business Suite
	Sell Expertise in StorageTek Tape Storage
	Sell Expertise Oracle Solaris
	Sell Expertise Oracle Zero Data Loss Recovery Appliance
	Sell Expertise People Soft
	Sell Expertise x86 Systems
	Sell Expetise in Exadata Database Machine
	Service Expertise in Installation SVC SPARC T7 servers
	Service Expertise Installation SVC StorageTek SL150
	Service Expertise Weblogic Server 12C
	STAR Security Trust Assurance and Risk
	SUSE Partner Autorizado
	Teldat Gold Partner
	Vmware Cloud Provider Advanced

OPERATION	CERTIFICATION
Sección Amarilla	PCI DSS 11.2.2
Global Hits	ISO 9001:2015
	ISO 27001:2013
	LFPDPPP (Esquema de autorregulación vinculante para la Protección de Datos Personales )
	Expansion The 500 most important companies in Mexico
	CMMI DEV Level 5 (Capability Maturity Model Integration)
Telvista	ISO 9001:2015
	PCI DSS 3.2.1
	SOC 2 TYPE II
Brazil	ISO 9001
	ISO 17025
	ISO 14001
	ISO 27001
Colombia	ISO 9001:2015
	ISO45001
	RUC - For its acronym in Spanish - Unique contractor registration. It is a management tool to evaluate Safety, Health and environmental aspects.
	ICREA V HSHA-WCQA
	ICREA III
	ISO/IEC 27001
	PCI-DSS
	SAP Certified in Hosting Service
	SAP Certified in SAP HANA Operations
	SAP Certified in Infrastructure Operations
	ISO/IEC 20000
	Silver Seal Equipares
	ISAE 3402
	Sello Verde ECO II
	Sello Empresa Incluyente
Costa Rica	Marca País, Esencial Costa Rica
Argentina	ISO / IEC 20000-1:2018
Paraguay	Sello i - "Amiga de la inclusión"
Uruguay	UNIT - ISO 9001:2015





OPERATION	CERTIFICATION
Chile	ISO 9001:2015
	ISO 45001:2018
	Certificate Of Compliance PCI Security Standars Council
	PRELAFIT Compliance
	SOC 1 - Reporte para organizaciones de Servicios Tipo II
	ISO 27001:2013
	CISCO Gold Provider
	SAP Certified in Cloud and Infrastructure Operation
	SAP Certified in Hosting Operations
	ISO/IEC 20000-1 :2018
	Cisco Powered Validate ervice For Managed SD-WAN
	Certified Service Partner Data Communication Enterprise IT
Peru	ISO 9001:2015
	ISO 27001:2013
	ESR
Ecuador	ISO 9001: 2015
	ISO 45001: 2018
	ISO 27001: 2013
	Tier III Certification of Design Data Xperience Center Durán
	Tier III Certification of Design Data Xperience Center Collaloma
Puerto Rico	PCI DSS v3.2.1
	ISO 45001
Dominican Repubic	Autorized Economic Operator - Operator type Importador Certified level (AEO)
	Great Place to Work* Model
	Golden Seal of Good Inclusive Labor Practices in the Dominican Republic - Igualando RD (gender equality)
	Golden Seal of Good Inclusive Labor Practices in the Dominican Republic - RD Incluye (for people with disabilities)
Claro Enterprise Solutions - USA	ISO 27001
	Latina Style 50 2021
	Artificial Intelligence Excellence Award 2021
	Best and Brightest Companies to Work for 2021

OPERATION	CERTIFICATION
Austria	ISO 9001:2015
	BGF (Gütesiegen Berufliche Gesundheitsförderung)
	ISO 14001:2015
	ISO 5001
	EMAS
	ISO 27001:2013
	Eco Datacenter
	ISO 20000-1
	ISO 37001
	ISO 19600
	EN 50600:2013 Design
	ISO 18295-1:2017
Belarus	ISO 9001
	ISO 45001
	ISO/IEC 27001:2013
	STB ISO/IEC 27001:2016
	Tier 3 Facility, A1 Data Center, Module 1
Bulgaria	ISO 9001:2015
	ISO 37001
	ISO 19600
	OHSAS 18001
	ISO 45001
	ISO 14001
	ISO 27001:2013
	ISO 27701:2019
	ISO 20000-1:2018
	Cisco Gold Parthner
	ISO 39001



OPERATION	CERTIFICATION
Croatia	ISO 9001
	ISO 37001
	ISO 19600
	ISO 45001
	ISO 14001
	ISO 27001:2013
	ISO 22301
Macedonia	ISO 9001:2015
	ISO 37001
	ISO 19600
	ISO 45001:2018
	ISO 27001:2013
	ISO 27018:2013
	ISO 22301-1:2019
	ISO 20000-1:2018
	ISO 20000-9:2011
	ISO 14001:2015
Serbia	ISO 45001:2018
	ISO 14001
	ISO 37001
	ISO 19600
Slovenia	ISO 45001:2018
	ISO 14001
	ISO 37001
	ISO 19600
	EMAS
	ISO/IEC 27001





# APPENDIX J: ASSOCIATIONS AND ORGANIZATIONS

(102-13)

## AMÉRICA MÓVIL

- The Foundation for the Global Compact (UNGC)
- Asociación Iberoamericana de Centros de Investigación y Empresas de Telecomunicaciones (ASIET)
- 5G Future Forum
- Groupe Speciale Mobile Association (GSMA)

## A1 TELEKOM AUSTRIA GROUP

- 5GAA – 5G Automotive Association e. V.
- Next Generation Mobile Networks Alliance
- respACT
- ETNO
- UN Global Compact

## AUSTRIA

- Code of Conduct on Data Centres Energy Efficiency

## ARGENTINA

- Cámara de Comercio Argentina Mexicana (CCAM)
- Cámara Argentina de Internet (CABASE)
- Cámara de Comercio de los Estados Unidos en Argentina (AMCHAM)
- Cámara de Sociedades
- Cámara Argentina de Comercio Electrónico (CACE)
- Asociación GSM (GSMA)
- Asociación Interamericana de Empresas de Telecomunicaciones (ASIET)
- Cámara Argentina de Comercio (CAC)
- Instituto de Auditores Internos de Argentina (IAIA)

## BRAZIL

- Associação Brasileira de TV por Assinatura
- Associação Brasileira de Recursos Telecom
- Associação Nacional de Operadores de Celulares
- Conselho de Desenvolvimento Econômico e SocialC
- Sindicato Nacional das Empresas de Telefonia e de Serviço Móvel Celular e Pessoal (SindiTeleBrasil) – Desde 2020, Conexis Brasil Digital
- Grupo de Institutos, Fundações e Empresas (GIFE)
- Rede Brasil do Pacto Global da Organização das Nações Unidas (ONU)

## BULGARIA

- Bulgarian Red Cross
- Bcause
- Bulgarian Donors Forum
- Bulgarian Business Leaders Forum
- National Foster Care Association
- National Children’s Network
- Bulgarian Association for People Management
- Council of Women in Business in Bulgaria
- Confederation of Employers and Industrialists in Bulgaria
- Bulgarian Industrial Association
- American Chamber of Commerce in Bulgaria
- Deutsch-Bulgarische Industrie- und Handelskammer
- Hellenic Business Council in Bulgaria
- IAB Bulgaria
- Bulgarian Association of Advertisers
- Bulgarian Public Relations Association



CHILE

- Asociación de chilena de telecomunicaciones (ChileTelcos)
- Instituto chileno de administración racional de empresas (ICARE)
- Cámara de integración chileno - mexicana (CICMEX)
- Sociedad de fomento fabril (SOFOFA)
- Asociación de operadores de televisión por suscripción (Acceso TV)
- Cámara chilena de infraestructura digital
- Asociación de Empresas de la V Región (ASIVA)
- Asociación chilena de empresas de tecnologías de la información (ACTI)
- Red de empresas inclusivas (REIN)

COLOMBIA

- Asociación Nacional de Empresas de Servicios Públicos y Comunicaciones de Colombia – ANDESCO
- Cámara Colombiana de Informática y Telecomunicaciones (CCIT)
- Cámara de Comercio Colombo Mexicana
- Asociación de Empresarios de Colombia (ANDI)
- Asociación de la Industria Móvil de Colombia – ASOMOVIL
- Asociación GSM – GSMA
- Cámara de Comercio Colombo Americana – AMCHAM
- Cámara de Comercio Electrónico – CCE
- Probarranquilla

COSTA RICA

- Cámara de Tecnologías de Información y Comunicación
- Cámara de Infocomunicación y Tecnología
- Cámara de Comercio Americana Costarricense
- Cámara de Industria y Comercio Costa Rica –México
- Alianza de Empresas para el Desarrollo

CROATIA

- UN Global Compact
- Croatian Business Council for Sustainable Development

DOMINICAN REPUBLIC

- Acción Empresarial por la Educación (EDUCA)
- Asociación de Comerciantes e Industriales de Santiago (ACIS)
- Asociación de Empresas de Comunicaciones y Tecnología (COMTEC)
- Asociación Dominicana de Empresas FINTECH (ADOFINTECH)
- Asociación de Industrias de la Región Norte (AIREN)
- Asociación de Industrias de la República Dominicana (AIRD)
- Asociación Dominicana de Constructores y Promotores de la Vivienda (ACOPROVI)
- Asociación Dominicana de Empresas de Inversión Extranjera (ASIEX)
- Asociación Hoteles y Turismo de la República Dominicana (ASONAHORES)
- Asociación Nacional de Jóvenes Empresarios (ANJE)
- Asociación Nacional de Usuarios No Regulados (ANUNR)
- Cámara Americana de Comercio de la República Dominicana (AMCHAM)
- Cámara de Comercio Dominico Mexicana (CADOMEX)
- Cámara de Comercio y Producción de Santiago (CCPS)
- Cámara de Comercio y Producción de Santo Domingo (CCPSD)
- Confederación Patronal de la República Dominicana (COPARDOM)
- Consejo Nacional Empresa Privada (CONEP)
- Fundación Dominicana de Desarrollo, Inc. (FDD)
- Fundación Institucionalidad y Justicia (FINJUS)
- Red Nacional de Apoyo Empresarial a la Protección Ambiental (ECORED)
- Cámara Dominicana de las Tecnologías de la Información y Comunicación (Cámara TIC)



ECUADOR

- Cámara de Comercio de Quito
- Cámara de Comercio de Guayaquil
- Cámara Binacional de Comercio Ecuador – México
- Cámara de Industrias de Guayaquil
- Cámara Ecuatoriano Británica de Guayaquil
- Asociación de Empresas de Telecomunicaciones (ASETEL)

EL SALVADOR

- Cámara Americana de Comercio de El Salvador
- Asociación Nacional de la Empresa
- Cámara de Comercio e Industria de El Salvador
- Cámara Salvadoreña de Telecomunicaciones
- Cámara Salvadoreña de la Construcción

GUATEMALA

- Cámara de Comercio de Guatemala (CCG)
- Cámara de Industria de Guatemala (CIG)
- Cámara de Comercio e Industria Guatemalteco Mexicana (CAMEX)
- Fundación de Empresarios Mexicanos (FUNDAMEX)

GLOBAL HITSS

- CANIETI (Cámara Nacional de la Industria Electrónica de Telecomunicaciones y Tecnologías de la Información)
- AMITI (Asociación Mexicana de la Industria de la Tecnología e Información)
- CANACO (Cámara Nacional de Comercio, Servicios y Turismo de la Ciudad de México)

HONDURAS

- Cámara de Comercio e Industrias de Siguatepeque
- Cámara de Comercio e Industrias de Tegucigalpa
- Cámara de Comercio e Industrias de Puerto Cortes
- Cámara de Comercio e Industrias de Progreso Yoro
- Cámara de Comercio e Industrias de Roatan
- Cámara de Comercio e Industrias de Tela

MEXICO

- Asociación Nacional de Telecomunicaciones (ANATEL)
- Capítulo Mexicano de la Cámara Internacional de comercial
- Consejo Coordinador Empresarial
- Confederación patronal de la República Mexicana

NICARAGUA

- Cámara de Comercio y Servicios de Nicaragua
- Cámara Minera de Nicaragua
- Cámara de Urbanizadores de Nicaragua
- Cámara de Comercio Americana de Nicaragua (AMCHAM)
- Unión Nicaragüense de Responsabilidad Social Empresarial (UNIRSE)
- Cámara Empresarial Mexicana Nicaragüense
- Cámara Nicaragüense de Internet y Telecomunicaciones
- Cámara de Industria y Comercio Nicaragüense – Costarricense

NORTH MACEDONIA

- Red Cross



MESSAGE FROM  
THE CEO



ENABLING A BETTER  
WORLD



ENABLING A BETTER  
PLANET



ENABLING A BETTER  
SOCIETY



ENABLING A BETTER  
WORKPLACE



ENABLING A BETTER  
BUSINESS FRAMEWORK



APPENDIXES



EXTERNAL  
VERIFICATION LETTER

PANAMA

- Cámara de Comercio Industrias y Agricultura de Panamá
- Cámara de Comercio Industrias y Agricultura de Chiriqui
- Cámara de Comercio Veraguas

PARAGUAY

- Cámara de Operadores Móviles del Paraguay (COMPy)
- Centro de Regulación, Normas y Estudios de la Comunicación (CERNECO)
- Cámara de Anunciantes del Paraguay (CAP)
- Federación de la Producción, la Industria y el Comercio (FEPRINCO)
- Red Paraguaya de Empresas Inclusivas (RPEI).

PERU

- Asociación para el Fomento de la Infraestructura Nacional (AFIN)
- Sociedad de Comercio Exterior del Perú (COMEXPERÚ)
- Asociación Nacional de Anunciantes (ANDA)
- Consejo Nacional de Autorregulación Publicitaria (CO-NARP)
- Asociación de Buenos Empleadores (ABE)
- Asociación GSMA
- Cámara de Comercio Americana del Perú (AMCHAM)
- Sociedad Nacional de Industrias (SNI)

PUERTO RICO

- Asociación de Industriales
- Asociación de Ejecutivos de Ventas y Mercadeo
- Alianza Puertorriqueña de Telecomunicaciones

SERBIA

- UN Global Compact
- Business Leaders Forum Serbia
- National Alliance for Local Economic Development (NALED)
- AmCham Serbia,
- Managers’ Association (SAM)
- Foreign Investors Council (FIC)
- Slovenian Business Club (SPK)
- Chamber of Italian-Serbian Businessmen, Forum for Responsible Business (FOP)
- Association of Serbian Businesswomen

SLOVENIA

- CER Center of energy efficiency solutions (2021)
- AmCham Commission for Sustainable Growth (2021)
- GSMA 5G IoT Strategy Group (2021)
- Diversity Charter (2021)
- SRIP Smart Cities and Communities (2019)
- Chamber of Commerce and Industry of Slovenia (2012)
- Managers’ Association of Slovenia (since 2010)
- UN Global Compact (2008)
- Forum EMS (2008)
- Green Network (since 2001)

TELCEL

- Asociación Mexicana de Internet
- Asociación Nacional de Telecomunicaciones

URUGUAY

- GSM Association

CLARO ENTERPRISE SOLUTIONS

- Columbia University, Center for Technology Management



# APPENDIX K: SASB INDEX

SUSTAINABILITY DISCLOSURE TOPICS AND ACCOUNTING METRICS				
TOPIC	CODE	ACCOUNTING METRIC	UNIT OF MEASURE	COMPANY RESPONSE 2021
Environmental Footprint of Operations	TC-TL-130a.1	(1) Total energy consumed	GigaJoules	23,344,521
		(2) Percentage grid electricity	Percentage (%)	79%
		(3) Percentage renewable	Percentage (%)	21%
Data Privacy	TC-TL-220a.1	Description of policies and practices relating to behavioral advertising and customer privacy	n/a	Go to page 50
	TC-TL-220a.2	Number of customers whose information is used for secondary purposes	Number	Not Available
	TC-TL-220a.3	Total amount of monetary losses as a result of legal proceedings associated with customer privacy	Reporting Currency	Go to page 49
	TC-TL-220a.4	(1) Number of law enforcement requests for customer information	Number	Go to page 51
		(2) Number of customers whose information was requested	Number	Not Available
		(3) Percentaje resulting in disclosure	Percentage (%)	Go to page 51
Data Security	TC-TL-230a.1	(1) Number of data breaches	Number	Go to page 49
		(2) Percentaje involving personally identifiable information (PII)	Percentage (%)	0
		(3) Number of customers affected	Number	0
	TC-TL-230a.2	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards.	n/a	Go to page 48
Product End of Life Management	TC-TL-440a.1*	(1) Materials recovered through take back programs	Metic tons (t)	Go to page 15
		(2) Percentage of recovered materials that were reused	Percentage (%)	1%
		(3) Percentage of recovered materials that were recycled	Percentage (%)	71%
		(4) Percentage of recovered materials that were landfilled	Percentage (%)	22%



SUSTAINABILITY DISCLOSURE TOPICS AND ACCOUNTING METRICS

TOPIC	CODE	ACCOUNTING METRIC	UNIT OF MEASURE	COMPANY RESPONSE 2021
Competitive Behaviour and Open Internet	TC-TL-520a.1	Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behavior regulations	Reporting Currency	0
	TC-TL-520a.2**	(1) Average actual sustained download speed of owned and commercially associated content	Megabits per second (Mbps)	13
		(2) Average actual sustained download speed of non associated content	Megabits per second (Mbps)	13
	TC-TL-520a.3	Description of risks and opportunities associated with net neutrality, paid peering, zero rating and related practices	n/a	Go to page 70
Managing Systemic Risks from Technology Disruptions	TC-TL-550a.1	(1) System average interruption frequency	Disruptions per customer	6.90%
		(2) Customer average interruption duration	Hours per customer	0.35hr. (21 min.)
	TC-TL-550a.2	Discussion of systems to provide unimpeded service during service interruptions	n/a	Go to page 23
Activity Metrics	TC-TL-000.A	Number of wireless Subscribers (millions)	Number	287
	TC-TL-000.B	Number of Wireline Subscribers (millions)	Number	80
	TC-TL-000.C	Number of Broadband Subscribers (millions)	Number	
	TC-TL-000.D	Network Traffic	Petabytes	111,742

\*Information regarding total waste, including operational waste and take back programs.  
\*\*Information of the mobile network in Mexico at December 2020. We don't make a distinction between owned and commercially associated content versus non-associated content.



# APPENDIX L: CLIMATE RELATED DISCLOSURES

América Móvil takes climate change very seriously, therefore, beyond identifying risks, we make commitments to address them appropriately in order to minimize the severity and probability of their occurrence.

## I. GOVERNANCE

(102-18)

The Audit and Corporate Practices Committee of the Board of Directors is supported by the Sustainability Committee and the Emissions and Energy Task Force led by the Chief Wireless Operation Officer to identify, evaluate, and monitor risks and opportunities related to climate change, as well as the definition and implementation of the Company's decarbonization strategy.

## II. RISK MANAGEMENT

This year, we held a Climate Change Risks Workshop with several representatives of Corporate and Local divisions of the Company to assess the vulnerability of our Mexican operations and the severity of Climate Change Impacts considering three different scenarios, 1.5°, 2° and 2.5°. Our European operation also concluded their Climate Risk Assessment for Austria and initiated a second phase in which they began replicating the assessment for the rest of our subsidiaries in Eastern Europe.

We continue working to quantify financial impacts under such scenarios and to replicate the assessment in the rest of our Latin American and European operation, to be in full compliance with Task Force on Climate-Related Financial Disclosures (TCFD) recommendations within the next 2 years.

## III. STRATEGY

(102-15, 210-2)

### CLIMATE RELATED RISKS AND IDENTIFIED IMPACTS

#### DAMAGE TO OUR INFRASTRUCTURE AND OUR ABILITY TO PROVIDE SERVICES

Extreme weather events precipitated by long-term climate change have the potential to directly damage network facilities or disrupt our ability to build and maintain portions of our network and could potentially disrupt suppliers' ability to provide products and services required to deliver reliable network coverage. Any such disruption could delay network deployment plans, interrupt service for our customers, increase our costs and have a negative effect on our operating results. The potential physical effects of climate change, such as increased frequency and severity of storms, floods, fires, freezing conditions, sea-level rise, and other climate-related events, could adversely affect our operations, infrastructure, and financial results. Operational impacts resulting from the potential physical effects of climate change, such as damage to our network infrastructure, could result in increased costs and loss of revenues. We could incur significant costs to improve the climate resiliency of our infrastructure and otherwise prepare for, respond to, and mitigate such physical effects of climate change.

#### INCREASE IN FREQUENCY AND INTENSITY OF TROPICAL CYCLONES

High-speed winds physically affect the infrastructure of base stations, customer service centers, telephone exchanges, and other buildings. Damages can include tower collapses, antenna damages, and tides causing local flooding. In addition, thunderstorms could affect radio frequency communication and increase the need for emergency plants and, consequently, fuel. Additionally, they can also affect cables and links. On the other hand, hurricanes can cause power or supply shortages and can affect access to facilities.

During the last years we have been developing:

- A contingency plan that considers a preventive stage before the impact of the meteorological phenomenon and describes the process of when a phenomenon of this type occurs, including collaboration with authorities, suppliers, and other relevant stakeholders, including an anti-looting plan.
- An adaptation plan for the high exposure infrastructure in accordance with the redesigned guidelines.

Beyond our contingency plans, we continue working on a vulnerability assessment on physical events of climate change in the regions where we operate. This will help us identify the operations that are exposed to extreme weather events so we can generate a mitigation and impact plan at the asset level.

### INCREASE IN AVERAGE TEMPERATURE

The increase in average temperature of the planet could have consequences for the Company's operations: 1) for the regular operation of our equipment, and 2) for our workforce. Both could have a financial impact on our operations.

Our facilities may require more air conditioning in certain regions, both to keep our equipment below its maximum operating temperature, and to ensure the well-being of our employees, and customers, which would result in higher costs in air conditioning equipment, maintenance, and operation.

Also, drastic increases in the average temperature in some of our regions could limit the working hours for those employees in the field, considering the impact of heat waves, increase in average temperatures, Ultraviolet exposure, and other similar conditions in the planning of maintenance work.

Adjusting opening hours in Customer Service Centers, adapting outdoors maintenance work timelines and safety gear, and fostering greater use of the digital service channels were some of the adaptation and mitigation plans discussed during the Climate Risks Workshop held in Mexico.

### CHANGES IN GREENHOUSE GAS (GHG) EMISSION LIMITS AND CARBON TAXES

Imposing GHG emission limits or taxes on our own operations or on critical suppliers can be a challenge due to the amount of investment, the need and complexity of training, the lack of new technologies and the difficulty of reporting since each country has its own metrics and methodologies.

Carbon taxes have already been implemented in some regions where we operate. There are several scenarios that predict that carbon restrictions and/or taxes could increase in different regions or countries. We are monitoring the possibility of imposing new taxes or increasing the current ones in the regions where we operate, and we take provisions so that we can mitigate the economic impact as much as possible.

América Móvil successfully presented its emission reduction target to the Science Based Targets Initiative (SBTi) organization in 2020. Furthermore, we have committed to becoming Net Zero by 2050. By implementing a strategy towards achieving these targets, we are confident that we will be able to mitigate this risk.

We continue advancing towards migrating to renewable energies in 46% of our subsidiaries through power purchase agreements; while we continue developing programs and projects to improve energy efficiency and reduce fuel consumption, mainly connecting remote base stations to the electricity grid.

Furthermore, we have been collaborating with other industry members within the GSMA Groupe Speciale Mobile Association, to encourage telecommunications industry suppliers to report their emissions and to set ambitious emission reduction targets.



## INCREASED COST OF RAW MATERIALS AND CHANGES IN REGULATIONS OF EXISTING PRODUCTS AND SERVICES

We expect more strict regulation in terms of efficiency and intensity in the use of resources, as well as the management of the life cycle of the products. A possible increase in the price of raw materials of devices could reduce the purchasing power of our consumers in some of the regions where we operate. Furthermore, most of the fuel we consume is used in remote base stations that cannot be connected to the electricity grid. The implementation of more restrictive regulations on existing goods and services could have a significant economic impact for the Company, especially if this is unforeseen or if there is a short transition time.

We are constantly monitoring possible changes in regulations to be prepared as much as possible. Plus, we are harmonizing practices across subsidiaries to refurbish and reuse materials to extend the life of devices and other electronic equipment and have a proper management once they are no longer in use. Additionally, we are reducing the number of off-grid base stations powered by diesel by connecting them to the local grid or powering them from renewable sources that are cost-effective and reliable.

We work side by side with the industry, value chain, our peers, and organizations to promote a circular economy, along with the reuse and recycling of discarded electronic materials to provide solutions above the expectations of stakeholders.

## CHANGES IN CONSUMER PREFERENCES

We expect our stakeholders to be more aware of the social and environmental impacts of the products and services they consume, particularly those associated to climate change. Millennials and Generation Z consumers are increasingly interested in the origin, sustainable sourcing of materials, ethical production and work conditions related to the goods and services that they purchase. Thus, maintaining a solid reputation, advancing our sustainability commitments, improving operations, and choosing our business partners carefully are key to the success of the Company.

This year, we updated our materiality analysis, to align our strategy to the changing preferences of our users and to better understand our stakeholders' expectations and concerns, in order to turn those risks into opportunities.

## OPPORTUNITIES RELATED TO CLIMATE CHANGE

### INCREASED REUSE AND RECYCLING

We are proud to be an important player in the recovery of the products we sell by fostering a circular economy along with the rest of the industry and the value chain. For this reason, we develop communication and outreach campaigns every year to promote a culture of recycling electronic waste in our communities. Additionally, we standardize practices across subsidiaries to refurbish and reuse materials, to extend the life of devices and other electronic equipment and have a proper management once they are no longer in use.

By extending the life cycle of network equipment, modems, landline telephone sets, routers, and set-top boxes, among others, we also reduce costs, and we restock our inventories, while minimizing impact to the environment.

Also, equipment that is still in good condition is fixed and donated to low-income organizations or individuals in order to bridge the digital divide. We are confident that this culture will continue to grow, and we will continue to capitalize on these practices to maintain our reputation.

### USE OF ENERGY SOURCES WITH LOWER EMISSION FACTORS

One of the main sources of America Móvil's emissions come from electricity consumption (Scope 2 emissions). The appearance of energy sources with lower emission factors represents a great financial, reputational and resilience opportunity for the Company.

Renewable energy sources have proven to be cleaner, less expensive, and more reliable. In addition, they represent an opportunity to address the problem of supplying power to base stations in remote areas through micro-generation and on-site generation.

### INCENTIVES TO SUPPORT PUBLIC POLICY

There are several organizations and governments that offer incentives for companies to migrate to cleaner energy production systems and/or suppliers.

We expect that these kind of incentives will continue to grow and capitalize on the opportunity to lower emissions, while increasing our network coverage in remote locations and migrating to new energy-saving technologies.

### USE OF NEW TECHNOLOGIES

Given the nature of the Company’s operations, América Móvil always uses state-of-the-art technology. We constantly modernize our networks to incorporate new generation equipment that is more efficient and with a lower impact on the environment.

### DEVELOPMENT AND/OR EXPANSION OF LOW EMISSION PRODUCTS AND SERVICES

This could represent one of the biggest opportunities for the Company, given that high-tech products and services rely more on connectivity and the Internet as their platform. The telecommunications industry plays a fundamental role in tackling climate change, as it enables other industries to meet their reduction targets through connectivity solutions.

América Móvil is already capitalizing on this opportunity through two strategies: 1) providing connection with fast and reliable coverage, as well as greater access within our markets; and 2) our Customer Relations and Value-Added Services areas that develop Business to Business (B2B) solutions that avoid emissions by making our clients’ operations more efficient and substituting the need to physically transfer employees.

### ACCESS TO BETTER CAPITAL CONDITIONS

The number of institutional investors that are focusing on investing in environmentally responsible companies and projects continues to increase every year. Reflecting consistency with our actions and commitments in favor of the environment, we can access capital with preferential conditions.

This year, with the introduction of our first Sustainability Linked Loan (SLL) we move forward towards better aligning our financial and Employee, Environment, Social, and Governance (EESG) performance. It was a 1.5 Billion Dollar Euro-equivalent Sustainability Linked Senior Unsecured Revolving Credit Facility, with a 5-year tenor. We selected three Key Performance Indicators, the first one relates to the reduction of absolute greenhouse gas (GHG) emissions, which aligns with our Science Based Target and Net Zero commitments. The second Key Performance Indicator touches on one of our most valuable assets, our employees, and is linked to health and safety standards. Also, we committed to increase the number of subsidiaries with ISO 45001 certifications. Our third Key Performance Indicator required for the inclusion of two female members in our Board of Directors. To date, we are well on track with the first two commitments and have fulfilled the third one in the first year of the facility.

The introduction of the Sustainability Linked Loan (SLL) has helped us to move forward towards better aligning our financial and EESG performance, and to ensure our stakeholders that we are committed and moving on the right direction towards EESG best practices.

## IV. METRICS AND TARGETS

For detailed information on our Scope 1, 2 and 3 Emissions and progress on our Science Based Targets and Net Zero Commitment, go to Chapter 3 and Appendix E.



# APPENDIX M: SUSTAINABILITY LINKED LOAN INDICATORS

KPI		DEFINITION	BASELINE (2019) <sup>1</sup>		TARGETS / RESULTS / THRESHOLDS				
					2021	2022	2023	2024	2025
E	1.	Reduce absolute CO <sub>2</sub> Emissions (Ton Co2e).  Scope 1 and Scope 2 (market based) emissions according to the (WRI) and the World Business Council for Sustainable Deelopment (WBCSD) Greenhouse Gas Protocols.	2,825 Ton CO <sub>2</sub> e	Target	2.0%	4.0%	7.3%	12.4%	19.0%
				Annual Result	11.86%	--	--	--	--
				Threshold	2.0%	2.0%	3.5%	5.5%	7.5%
S	2.	Increase the number of subsidiaries with an ISO 45001 certification.  Number of subsidiaries of América Móvil that have obtained an ISO 45001 certification.	7	Target	5	10	15	20	25
				Annual Result	11	--	--	--	--
				Threshold	2	7	12	17	22
G	3.	Increase the number of women in the board of directors.  Number of women in the Board of Directors of América Móvil, certified by an external evaluation.	1	Target	1	1	2	2	3
				Annual Result	3	--	--	--	--
				Threshold	1	1	2	2	3

<sup>1</sup> We adjusted the 2019 baseline to make information comparable, considering the following situations:

- Tracfone was sold in 2021, so we excluded its data from the 2019 baseline.
- We adopted “Outside of Scopes” criteria aligned to our current Accuvio methodology for “Fugitive Refrigerants” emissions.
- We corrected the Dominican Republic Scope 1 for “Fugitive Refrigerants”, (Originally overreported).



# APPENDIX N: GRI INDEX

(102-55)

INDICATOR	DESCRIPTION	PAGE	REFERENCE
GRI 102: GENERAL DISCLOSURES, 2016			
102-1	Name of the organization	2	
102-2	Activities, brands, products, and services*		You can find more information on pages 10, 13, 14, and 15 of the Annual Report/20-F: <a href="https://s22.q4cdn.com/604986553/files/doc_financials/2021/ar/Annual-Report-20F.pdf">https://s22.q4cdn.com/604986553/files/doc_financials/2021/ar/Annual-Report-20F.pdf</a>
102-3	Location of headquarters		You can find more information on page 10 of the Annual Report/20-F: <a href="https://s22.q4cdn.com/604986553/files/doc_financials/2021/ar/Annual-Report-20F.pdf">https://s22.q4cdn.com/604986553/files/doc_financials/2021/ar/Annual-Report-20F.pdf</a>
102-4	Location of operations		You can find more information on pages 11 and 12 of the Annual Report/20-F: <a href="https://s22.q4cdn.com/604986553/files/doc_financials/2021/ar/Annual-Report-20F.pdf">https://s22.q4cdn.com/604986553/files/doc_financials/2021/ar/Annual-Report-20F.pdf</a>
102-5	Ownership and legal form		You can find more information on page 10 of the Annual Report/20-F: <a href="https://s22.q4cdn.com/604986553/files/doc_financials/2021/ar/Annual-Report-20F.pdf">https://s22.q4cdn.com/604986553/files/doc_financials/2021/ar/Annual-Report-20F.pdf</a>
102-6	Markets served		You can find more information on pages 11 and 12 of the Annual Report/20-F: <a href="https://s22.q4cdn.com/604986553/files/doc_financials/2021/ar/Annual-Report-20F.pdf">https://s22.q4cdn.com/604986553/files/doc_financials/2021/ar/Annual-Report-20F.pdf</a>
102-7	Scale of the organization	28, 30, 83	
102-8	Information on employees and other workers	30, 83	
102-9	Supply chain	53, 94	
102-10	Significant changes to the organization and its supply chain		No significant changes in the supply chain.
102-12	External initiatives	2, 11, 75, 77	
102-13	Membership of associations	107	
102-14	Statement from senior decision maker	3	
102-15	Key impacts, risks, and opportunities	3, 68, 113	
102-16	Values, principles, standards, and norms of behavior	6	
102-17	Mechanisms for advice and concerns about ethics	45, 46, 47, 93	
102-18	Governance structure	12, 44, 92, 113	You can find more information on pages 59 to 64 of the Annual Report/20-F: <a href="https://s22.q4cdn.com/604986553/files/doc_financials/2021/ar/Annual-Report-20F.pdf">https://s22.q4cdn.com/604986553/files/doc_financials/2021/ar/Annual-Report-20F.pdf</a>
102-19	Delegating authority	44, 48, 92	
102-20	Executive-level responsibility for economic, environmental, and social topics	12, 44, 45, 48, 92	
102-21	Consulting stakeholders on economic, environmental, and social topics	8, 62	
102-22	Composition of the highest governance body and its committees	44, 92	You can find more information on pages 59 to 61 of the Annual Report/20-F: <a href="https://s22.q4cdn.com/604986553/files/doc_financials/2021/ar/Annual-Report-20F.pdf">https://s22.q4cdn.com/604986553/files/doc_financials/2021/ar/Annual-Report-20F.pdf</a>
102-23	Chair of the highest governance body		You can find more information on pages 59 to 61 of the Annual Report/20-F: <a href="https://s22.q4cdn.com/604986553/files/doc_financials/2021/ar/Annual-Report-20F.pdf">https://s22.q4cdn.com/604986553/files/doc_financials/2021/ar/Annual-Report-20F.pdf</a>



INDICATOR	DESCRIPTION	PAGE	REFERENCE
102-24	Nominating and selecting the highest governance body		You can find more information on pages 59 to 61 of the Annual Report/20-F: <a href="https://s22.q4cdn.com/604986553/files/doc_financials/2021/ar/Annual-Report-20F.pdf">https://s22.q4cdn.com/604986553/files/doc_financials/2021/ar/Annual-Report-20F.pdf</a>
102-25	Conflicts of interest	47	
102-26	Role of the highest governance body in setting purpose, values, and strategy	5	
102-29	Identifying and managing economic, environmental, and social impacts	8, 62	
102-31	Review of economic, environmental, and social topics	8, 62	
102-32	Highest governance body’s role in sustainability reporting	7	
102-40	List of stakeholder groups	64	
102-41	Collective bargaining agreements	33	
102-42	Identifying and selecting stakeholders	64	
102-43	Approach to stakeholder engagement	64	
102-44	Key topics and concerns raised	64	
102-45	Entities included in the consolidated financial statements	28	
102-46	Defining report content and topic Boundaries	2	
102-47	List of material topics	8, 62	
102-50	Reporting period	2	
102-51	Date of most recent report	2	
102-52	Reporting cycle	2	
102-53	Contact point for questions regarding the report	61	
102-54	Claims of reporting in accordance with the GRI Standards	2	
102-55	GRI content index	118	
102-56	External assurance	2, 123	
GRI 201: ECONOMIC PERFORMANCE, 2016			
201-1	Direct economic value generated and distributed	28	
201-2	Financial implications and other risks and opportunities due to climate change	68	
GRI 203: INDIRECT ECONOMIC IMPACTS, 2016			
203-1	Infrastructure investments and services supported	22, 28	
203-2	Significant indirect economic impacts	22, 25, 89	



INDICATOR	DESCRIPTION	PAGE	REFERENCE
GRI 204: PROCUREMENT PRACTICES, 2016			
204-1	Proportion of spending on local suppliers	53, 94	
GRI 205:ANI-CORRUPTION, 2016			
205-2	Communication and training about anticorruption policies and procedures	45, 46	
GRI 206: ANTI-COMPETITIVE BEHAVIOR, 2016			
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	97	
GRI 207: TAX 2016			
207-1	Approach to tax	52, 95	
207-4	Country-by-country reporting	52, 95	
GRI 302: ENERGY, 2016			
302-1	Energy consumption within the organization	14, 15, 79, 80	You can find more information in the independent assurance appendix.
302-4	Reduction of energy consumption	79	
302-5	Reductions in energy requirements of products and services	14	
GRI 304: BIODIVERSITY, 2016			
304-2	Significant impacts of activities, products, and services on biodiversity	17	
304-3	Habitats protected or restored	17	
GRI 305: EMISSIONS, 2016			
305-1	Direct (Scope 1) GHG emissions	16, 82	You can find more information in the independent assurance appendix.
305-2	Energy indirect (Scope 2) GHG emissions	16, 82	You can find more information in the independent assurance appendix.
305-3	Other indirect (Scope 3) GHG emissions	16, 82	
305-4	GHG emissions intensity	16, 82	
GRI 306: WASTE, 2020			
306-2	Management of significant waste-related impacts	15, 81	You can find more information in the independent assurance appendix.
306-4	Waste diverted from disposal	15, 81	
306-5	Waste directed to disposal	15, 81	
GRI 307: ENVIRONMENTAL COMPLIANCE, 2016			
307-1	Non-compliance with environmental laws and regulations	102	No significant fines were reported in environmental issues.





INDICATOR	DESCRIPTION	PAGE	REFERENCE
GRI 401: EMPLOYMENT, 2016			
401-1	New employee hires and employee turnover	30, 35, 84	
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	40	
401-3	Parental leave	40	
GRI 403: OCCUPATIONAL HEALTH AND SAFETY, 2018			
403-1	Occupational health and safety management system	34	
403-5	Worker training on occupational health and safety	34	
403-6	Promotion of worker health	34, 41	
403-9	Work-related injuries	87, 88	You can find more information in the independent assurance appendix.
GRI 404: TRAINING AND EDUCATION, 2016			
404-1	Average hours of training per year per employee	37, 86, 87	You can find more information in the independent assurance appendix.
404-2	Programs for upgrading employee skills and transition assistance programs	37	
404-3	Percentage of employees receiving regular performance and career development reviews	39, 86	
GRI 405: DIVERSITY AND EQUAL OPPORTUNITY, 2016			
405-1	Diversity of governance bodies and employees	30, 33, 44, 83, 84, 85, 91	
405-2	Ratio of base salary and remuneration of women and men	40, 85	
GRI 415: PUBLIC POLICY 2016			
415-1	Political contributions	96	
GRI 418: CUSTOMER PRIVACY 2016			
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	51	In 2021, no substantiated complaints concerning customer privacy were presented.
GRI 419: SOCIOECONOMIC COMPLIANCE, 2016			
419-1	Non-compliance with laws and regulations in the social and economic arena	102	
CYBERSECURITY INFORMATION			
	Countires Certified in Management Security System	48, 103	

*\*From our total revenues in 2020, 0.06% comes from adult content.*



MESSAGE FROM  
THE CEO



ENABLING A BETTER  
WORLD



ENABLING A BETTER  
PLANET



ENABLING A BETTER  
SOCIETY



ENABLING A BETTER  
WORKPLACE



ENABLING A BETTER  
BUSINESS FRAMEWORK



APPENDIXES



EXTERNAL  
VERIFICATION LETTER

# APPENDIX O:

# TAX TABLE

## ORGANIZATIONAL STRUCTURE AT DECEMBER 31ST 2020

DENOMINATION OR COMPANY NAME OF THE ENTITIES RESIDENT IN THE TAX JURISDICTION	RESIDENCE TAX JURISDICTION	MAIN ECONOMIC ACTIVITIES
Amx Argentina, S.A.	Argentina	Provision of services to non-related parties
Arrendadora Movil Argentina, S.A.	Argentina	Other. Equipment leasing
Ertach, S.A.	Argentina	Provision of services to non-related parties
Ideas Musicales, S.A.	Argentina	Other. Digital content distribution
Metrored Holdings, S.A.	Argentina	Holding of shares or other instruments
Mixplay, S.A.	Argentina	Other. Provision of services
OPM Argentina S.A.	Argentina	Other. Equipment leasing
Telmex Argentina, S.A.	Argentina	Provision of services to non-related parties
Ertach S.A. y Telecom Argentina S.A.	Argentina	Provision of services to non-related parties
A1 Digital International GmbH	Austria	Provision of services to non-related parties
A1 Telekom Austria AG	Austria	Provision of services to non-related parties
A1now TV GmbH	Austria	Inactive
Cable Runner GmbH	Austria	Construction and maintenance of telephone networks
Cable Runner Austria GmbH & Co KG	Austria	Resale and leasing of infrastructure
Kroatien Beteiligungsverwaltung GmbH	Austria	Holding of shares or other instruments
Mk Logistik GmbH	Austria	Administrative, management or support services
Mobilkom Belarus Beteiligungsverwaltung GmbH	Austria	Holding of shares or other instruments
Mobilkom Beteiligungs GmbH	Austria	Holding of shares or other instruments
Mobilkom Bulgarien Beteiligungsverwaltung GmbH	Austria	Holding of shares or other instruments
Mobilkom Cee Beteiligungsverwaltungs GmbH	Austria	Holding of shares or other instruments
Mobilkom Mazedonien Beteiligungsverwaltungs GmbH	Austria	Holding of shares or other instruments
Paybox Bank AG	Austria	Regulated Financial Services

DENOMINATION OR COMPANY NAME OF THE ENTITIES RESIDENT IN THE TAX JURISDICTION	RESIDENCE TAX JURISDICTION	MAIN ECONOMIC ACTIVITIES
Paybox Service GmbH	Austria	Provision of services to non-related parties
Telekom Austria AG	Austria	Administrative, management or support services
Telekom Austria Personalmanagement GmbH	Austria	Administrative, management or support services
Telekom Finanzmanagement GmbH	Austria	Group internal financing
Wedify GmbH	Austria	Administrative, management or support services
World Direct Ebusiness Solutions GmbH	Austria	Provision of services to non-related parties
A1 Projektentwicklungs GmbH	Austria	Holding of shares or other instruments
Invenium Data Insights GmbH	Austria	Provision of services to non-related parties
Claro Barbados, Inc.	Barbados	Inactive
A1 Content, Belarus	Belarus	Other. Content
Unitary Enterprise A1	Belarus	Provision of services to non-related parties
Unitary Enterprise Solar Invest	Belarus	Provision of services to non-related parties
Unitary Enterprise Ta-Engineering.	Belarus	Construction and maintenance of telephone networks
Vitebskiy OTTC Garant	Belarus	Other. Content
Jetstream BH D.O.O. Bosnia -Herzegovina	Bosnia and Herzegovina	Infrastructure leasing
Reyc Comércio e Participações Ltda.	Brasil	Other. Provision of services
Claro Pay S.A.	Brasil	Other. Provision of services
Americel, S.A.	Brazil	Provision of services to non-related parties
Brasil Center Comunicações Ltda.	Brazil	Provision of services to non-related parties
Claro Telecom Participações, S.A.	Brazil	Holding of shares or other instruments
Claro, S.A.	Brazil	Provision of services to non-related parties
Eg Participações S.A.	Brazil	Holding of shares or other instruments
Embratel Tvsat Telecomunicações Ltda.	Brazil	Provision of services to non-related parties
Hitss Do Brasil Serviços Tecnológicos Ltda.	Brazil	Other. Provision of services
Claro Nxt Participções, Ltda	Brazil	Holding of shares or other instruments
Claro Nxt Telecomunicações de Longa Distancia, Ltda	Brazil	Provision of services to non-related parties
Claro Nxt Telecomunicações, Ltda	Brazil	Provision of services to non-related parties
Sunbird Participações, Ltda	Brazil	Provision of services to non-related parties
Sunbird Telecomunicações, Ltda	Brazil	Provision of services to non-related parties
Telmex Do Brasil Ltda.	Brazil	Provision of services to non-related parties





DENOMINATION OR COMPANY NAME OF THE ENTITIES RESIDENT IN THE TAX JURISDICTION	RESIDENCE TAX JURISDICTION	MAIN ECONOMIC ACTIVITIES
Telmex Solutions Telecomunicações Ltda.	Brazil	Provision of services to non-related parties
Asdrubal Finance Ltd	British Virgin Islands	Inactive
Ingenial Limited	British Virgin Islands	Inactive
Telglobe Financial Holdings, Corp.	British Virgin Islands	Inactive
A1 Bulgaria EAD	Bulgaria	Provision of services to non-related parties
Cabletel Prima AD	Bulgaria	Provision of services to non-related parties
Aprimis EOOD	Bulgaria	Provision of services to non-related parties
CES Technology Solutions LTD.	Canada	Inactive
Claro Chile, S.A.	Chile	Provision of services to non-related parties
Claro Comunicaciones, S.A.	Chile	Provision of services to non-related parties
Claro Holding, S.A.	Chile	Holding of shares or other instruments
Claro Servicios, S.A.	Chile	Other. Equipment leasing.
Telecomunicaciones Inalámbricas, S.A.	Chile	Other. Equipment leasing.
Comunicación Celular, S.A.	Colombia	Provision of services to non-related parties
Hitss Colombia, S.A.S.	Colombia	Other. IT Services provision
Ideas Musicales de Colombia, S.A.S.	Colombia	Provision of services to non-related parties
Infracel, S.A. E.S.P.	Colombia	Provision of services to non-related parties
Operadora de Pagos Móviles de Colombia, S.A.S.	Colombia	Inactive
Amov Colombia, S.A. de C.V.	Colombia (Mexico)	Holding of shares or other instruments
Claro CR Telecomunicaciones, S.A.	Costa Rica	Provision of services to non-related parties
SITES TELECOMUNICACIONES COSTA RICA, S.A.	Costa Rica	Other. Property leasing
A1 Hrvatska D.O.O.	Croatia	Provision of services to non-related parties
SB Telecom Ltd.	Cyprus (Slovenia)	Holding of shares or other instruments
Ta CZ Site S.R.O.	Czech Republic	Infrastructure leasing
Amov International Teleservices, S.A.S.	Dominican Republic	Provision of services to non-related parties
Compañía Dominicana de Telefonos, S.A.	Dominican Republic	Provision of services to non-related parties
Operaciones de Procesamiento de Información y Telefonía, S.A.S.	Dominican Republic	Administrative, management or support services
Consortio Ecuatoriano de Telecomunicaciones, S.A.	Ecuador	Provision of services to non-related parties
Hitss Ecuador, S.A.	Ecuador	Other. IT Services provision
Amovecuador, S.A.	Ecuador (Mexico)	Holding of shares or other instruments
Sites el Salvador, S.A. de C.V.	El Salvador	Other. Property leasing

DENOMINATION OR COMPANY NAME OF THE ENTITIES RESIDENT IN THE TAX JURISDICTION	RESIDENCE TAX JURISDICTION	MAIN ECONOMIC ACTIVITIES
Compañía de Telecomunicaciones de El Salvador, S.A. de C.V.	El Salvador	Provision of services to non-related parties
CTE Telecom Personal, S.A. de C.V.	El Salvador	Provision of services to non-related parties
Publitel, S.A. de C.V.	El Salvador	Inactive
Servicios Laborales, S.A. de C.V.	El Salvador	Administrative, management or support services
Telecom Publicar Directorios, S.A. de C.V.	El Salvador	Provision of services to non-related parties
Telecomoda, S.A. de C.V.	El Salvador	Provision of services to non-related parties
A1 Digital Deutschland GmbH	Germany	Provision of services to non-related parties
Akenes GmbH	Germany	Inactive
Jetstream Germany GmbH	Germany	Infrastructure leasing
Cablenet, S.A.	Guatemala	Provision of services to non-related parties
Claro Guatemala, S.A.	Guatemala	Provision of services to non-related parties
Destel, S.A.	Guatemala	Inactive
Sites Guatemala, S.A.	Guatemala	Other. Property leasing
Operadora de Agencias, S.A. de C.V.	Guatemala	Administrative, management or support services
Operadora Laboral, S.A. de C.V.	Guatemala	Administrative, management or support services
Servicios Diversos de Recursos Humanos, S.A. de C.V.	Guatemala	Administrative, management or support services
Telecomunicaciones de Guatemala, S.A.	Guatemala	Provision of services to non-related parties
Compañía de Relaciones Laborales, S.A.	Honduras	Administrative, management or support services
Escucha (Honduras), S.A. de C.V.	Honduras	Provision of services to non-related parties
Servicios de Comunicaciones de Honduras, S.A. de C.V.	Honduras	Provision of services to non-related parties
Sites Honduras, S.A. de C.V.	Honduras	Other. Property leasing
Telecosmos de Honduras, S.A. de C.V.	Honduras	Inactive
Jetstream Hungary Kft.	Hungary	Infrastructure leasing
JETSTREAM Italy S.r.l.	Italy	Infrastructure leasing
AMX Holdings S.à.r.l	Luxemburg	Holding of shares or other instruments
AMX Brazil Holdings S.à r.l.	Luxemburg	Holding of shares or other instruments
AMX International Mobile S.à.r.l.	Luxemburg	Holding of shares or other instruments
A1 Makedonija DOOELSkopje	Macedonia	Provision of services to non-related parties
Telemedia Dooel Skopje	Macedonia	Provision of services to non-related parties



DENOMINATION OR COMPANY NAME OF THE ENTITIES RESIDENT IN THE TAX JURISDICTION	RESIDENCE TAX JURISDICTION	MAIN ECONOMIC ACTIVITIES
A1 Tower DOOEL Skopje	Macedonia	Provision of services to non-related parties
360 HQ, S.A. de C.V.	Mexico	Administrative, management or support services
Administradora de Activos Transfer, S.A.Pl. De CV	Mexico	Inactive
Administradora de Marcas RD, S. de R.L. de C.V.	Mexico	Intellectual property holding company or administrator
Administradora de Pagos Móviles, S.A. de C.V.	Mexico	Provision of management services
Aerofrisco, S.A. de C.V.	Mexico	Other. Provision of services
Alquiladora de Casas, S.A. de C.V.	Mexico	Other. Property leasing
AM Latin America, S.A. de C.V.	Mexico	Holding of shares or other instruments
Amatech, S.A. de C.V.	Mexico	Other . Telemarketing services
America Central Tel, S.A. de C.V.	Mexico	Holding of shares or other instruments
América Móvil, S.A.B. de C.V.	Mexico	Holding of shares or other instruments, Intra-group financing
Amov Canada, S.A. de C.V.	Mexico	Holding of shares or other instruments
Amov I, S.A. de C.V.	Mexico	Holding of shares or other instruments
Amov III, S.A. de C.V.	Mexico	Holding of shares or other instruments
Amov IV, S.A. de C.V.	Mexico	Holding of shares or other instruments
Amx Colombia, S.A. de C.V.	Mexico	Holding of shares or other instruments
Amx Contenido, S.A. de C.V.	Mexico	Other. Digital Content
Amx Ecuador, S.A. de C.V.	Mexico	Holding of shares or other instruments
Amx El Salvador, S.A. de C.V.	Mexico	Holding of shares or other instruments
Amx Guatemala, S.A. de C.V.	Mexico	Holding of shares or other instruments
Amx Honduras, S.A. de C.V.	Mexico	Holding of shares or other instruments
Amx Nicaragua, S.A. de C.V.	Mexico	Holding of shares or other instruments
Amx Tenedora, S.A. de C.V.	Mexico	Holding of shares or other instruments
Amx USA Holding, S.A. de C.V.	Mexico	Holding of shares or other instruments
Amx Wellington Gardens, S.A. de C.V.	Mexico	Holding of shares or other instruments
Anuncios en Directorios, S.A. de C.V.	Mexico	Other. Advertising services
CGTEL, S.A.P.I. de C.V.	Mexico	Holding of shares or other instruments
Claro Sat, S.A. de C.V.	Mexico	Inactive
Claro TV, S.A. de C.V.	Mexico	Provision of services to non-related parties
Comertel Argos, S.A. de C.V.	Mexico	Administrative, management or support services

DENOMINATION OR COMPANY NAME OF THE ENTITIES RESIDENT IN THE TAX JURISDICTION	RESIDENCE TAX JURISDICTION	MAIN ECONOMIC ACTIVITIES
Compañía de Teléfonos y Bienes Raíces, S.A. de C.V.	Mexico	Provision of services to non-related parties
Consorcio Red Uno, S.A. de C.V.	Mexico	Rendering of services to non-related parties, Network services
Construcciones y Canalizaciones, S.A. de C.V.	Mexico	Other. Network construction and maintenance services
Controladora de Servicios de Comunicaciones TMX, S.A. de C.V.	Mexico	Holding of shares or other instruments
Controladora de Servicios en Telecomunicaciones, S.A. de C.V.	Mexico	Other. Equipment leasing.
Duono, S.A. de C.V.	Mexico	Other. Frequency leasing
E35, S.A. de C.V.	Mexico	Other. Digital Content
Empresa de Limpieza Mexicana, S.A. de C.V.	Mexico	Administrative, management or support services
Empresa de Servicios y Soporte Integral GC, S.A.P.I. de C.V.	Mexico	Holding of shares or other instruments
Empresas y Controles en Comunicaciones, S.A. de C.V.	Mexico	Holding of shares or other instruments
Enitel De Nicaragua, S.A. de C.V.	Mexico	Holding of shares or other instruments
Foltena, S.A. de C.V.	Mexico	Other. Content creation and dissemination
Fuerza y Clima, S.A. de C.V.	Mexico	Other. Network construction and maintenance services
Grupo Técnico de Administración, S.A. de C.V.	Mexico	Administrative, management or support services
Grupo Telvista, S.A. de C.V.	Mexico	Other. Provision of call center services
Hitss Consulting, S.A. de C.V.	Mexico	Other. Consulting and software development
Hitss Solutions, S.A. de C.V.	Mexico	Holding of shares or other instruments
Ideas Musicales, Servicios, Interactividad y Comunidad Audiovisuales, S.A. de C.V.	Mexico	Other. Video production
Impulsora Mexicana de Energía, S.A. de C.V.	Mexico	Inactive
Impulsora Mexicana de Telecomunicaciones, S.A. de C.V.	Mexico	Other. Network design and maintenance services
Inmobiliaria El Recuerdo, S.A. de C.V.	Mexico	Other. Property leasing
Inmobiliaria Las Trufas, S.A. de C.V.	Mexico	Other. Property leasing
Inmuebles Madag, S.A. de C.V.	Mexico	Other. Property leasing





DENOMINATION OR COMPANY NAME OF THE ENTITIES RESIDENT IN THE TAX JURISDICTION	RESIDENCE TAX JURISDICTION	MAIN ECONOMIC ACTIVITIES
Instituto Tecnológico de Teléfonos de México, S.C.	Mexico	Other. Education
Integración de Servicios Empresariales y Corporativos, S.A. de C.V.	Mexico	Holding of shares or other instruments
LATAM Servicios Integrales, S.A. de C.V.	Mexico	Administrative, management or support services
Multimedia Corporativo, S.A. de C.V.	Mexico	Holding of shares or other instruments
Operadora de Pagos Móviles de México, S.A. de C.V.	Mexico	Other. Mobile payment services.
Operadora Mercantil, Administración y Soporte Integral, S.A. de C.V.	Mexico	Administrative, management or support services
Prestaciones Profesionales Empresariales, S.A. de C.V.	Mexico	Administrative, management or support services
Procesadora de Pagos Móviles, S.A. de C.V.	Mexico	Holding of shares or other instruments
Radiomóvil DIPSA, S.A. de C.V.	Mexico	Provision of services to non-related parties
Red Nacional Última Milla, S.A. de C.V.	Mexico	Provision of services to non-related parties
Red Última Milla del Noroeste, S.A. de C.V.	Mexico	Provision of services to non-related parties
Redes de Información y Educación del Siglo XXI, S.A. de C.V.	Mexico	Holding of shares or other instruments
Scitum, S.A. de C.V.	Mexico	Provision of services to unrelated parties, Other. Security services
Sercotel, S.A. de C.V.	Mexico	Holding of shares or other instruments, Intra-group financing
Servicios de Telecomunicaciones Última Milla, S.A. de C.V.	Mexico	Holding of shares or other instruments
Servicios Especializados Scitum, S.A. de C.V.	Mexico	Administrative, management or support services
Servisys VS, S.A. de C.V.	Mexico	Administrative, management or support services
Sigmatoo Factory, S.A. de C.V.	Mexico	Provision of services to non-related parties
Sigtao Software, S.A. de C.V.	Mexico	Provision of services to non-related parties
Soporte de Servicios Integrados LATAM, S.A. de C.V.	Mexico	Administrative, management or support services
Speedy Móvil Servicios, S.A. de C.V.	Mexico	Administrative, management or support services
Speedy Móvil, S.A. de C.V.	Mexico	Other. Development and production of internet tools

DENOMINATION OR COMPANY NAME OF THE ENTITIES RESIDENT IN THE TAX JURISDICTION	RESIDENCE TAX JURISDICTION	MAIN ECONOMIC ACTIVITIES
SVT Servicios Nube, S.A. de C.V.	Mexico	Provision of services to non-related parties
Tecmarketing, S.A. de C.V.	Mexico	Other. Telemarketing service
TEINTL, S.A. de C.V.	Mexico	Holding
Teleconstructora, S.A. de C.V.	Mexico	Other. Network construction and maintenance services
Teléfonos de México, S.A.B. de C.V.	Mexico	Provision of services to non-related parties
Teléfonos del Noroeste, S.A. de C.V.	Mexico	Provision of services to non-related parties
Tenedora Telpri, S.A. de C.V.	Mexico	Holding of shares or other instruments
Teninver, S.A. de C.V.	Mexico	Provision of services to non-related parties
Triara.com, S.A. de C.V.	Mexico	Provision of services to non-related parties
TV Mex Contenido, S. de R.L. de C.V.	Mexico	Other. Digital Content
Uninet, S.A. de C.V.	Mexico	Provision of services to non-related parties
V-SYS, S.A. de C.V.	Mexico	Provision of services to non-related parties
Widcombe, S.A. de C.V.	Mexico	Holding of shares or other instruments
América Móvil B.V.	Netherlands	Holding of shares or other instruments
Amov Finance B.V.	Netherlands	Group internal financing
Guatemala Cellular Holdings, B.V.	Netherlands	Holding of shares or other instruments
Olympic Plaza Holdings N.V.	Netherlands	Group internal financing
Cablenet, S.A.	Nicaragua	Provision of services to non-related parties
Empresa Nicaragüense de Telecomunicaciones, S.A.	Nicaragua	Provision of services to non-related parties
Estaciones Terrenas de Satélite, S.A.	Nicaragua	Provision of services to non-related parties
Informática y Tecnología de Nicaragua, S.A.	Nicaragua	Inactive
Ingeniería de Teléfonos y Comunicaciones, S.A.	Nicaragua	Inactive
Mensajero Electrónico, S.A.	Nicaragua	Inactive
Claro Panamá, S.A.	Panama	Provision of services to non-related parties
Sites Telecomunicaciones Panamá, S.A.	Panama	Other. Property leasing
Estesa Holding Corp.	Panama	Holding of shares or other instruments
Liberty Wireless Corp.	Panama	Provision of services to non-related parties
Amx Paraguay, S.A.	Paraguay	Provision of services to non-related parties
Operadora de Pagos Móviles Paraguay, S.A.	Paraguay	Other. Mobile payment platform
América Móvil Perú, S.A.C.	Peru	Provision of services to non-related parties
Amx Torres Perú, S.A.C.	Peru	Inactive
Hitss Perú, S.A.C.	Peru	Other. Digital content production



DENOMINATION OR COMPANY NAME OF THE ENTITIES RESIDENT IN THE TAX JURISDICTION	RESIDENCE TAX JURISDICTION	MAIN ECONOMIC ACTIVITIES
Olo del Perú S.A.C.	Peru	Provision of services to non-related parties
TVS Wireless S.A.C.	Peru	Provision of services to non-related parties
Jetstream Poland Spolka Z Ograniczona Odowiedzialnoscia	Poland	Infrastructure leasing
Coquinet Corporation	Puerto Rico	Provision of services to non-related parties
Puerto Rico Telephone Company, Inc.	Puerto Rico	Provision of services to non-related parties
Telecomunicaciones de Puerto Rico, Inc.	Puerto Rico	Holding of shares or other instruments
Jetstream Ro SRL	Romania	Infrastructure leasing
Vip Mobile D.O.O.	Serbia	Provision of services to non-related parties
Jetstream Slovakia S.R.O.	Slovakia	Infrastructure leasing
A1 Slovenija D.D.	Slovenia	Provision of services to non-related parties
TS RPL d.d.	Slovenia	Other. Content and ISP
P&ROM d.o.o.	Slovenia	Other. Content and ISP
DOSTOP KOMUNIKACIJE d.o.o.	Slovenia	Other. Content and ISP
STUDIO PROTEUS D.O.O.	Slovenia	Other. Content and ISP
Claro Enterprise Solutions S.L.U.	Spain	Provision of services to non-related parties
Akenes, S.A.	Switzerland	Provision of services to non-related parties
Jetstream Switzerland GmbH	Switzerland	Infrastructure leasing
Jetstream Tr Telekomünikasyon Hizmetleri Ve Ticaret Limited Sirketi	Turkey	Infrastructure leasing
Jetstream England Limited	United Kingdom	Infrastructure leasing
Airfone Holdings LLC	United States	Holding of shares or other instruments
Amx Treasury, LLC.	United States	Inactive

DENOMINATION OR COMPANY NAME OF THE ENTITIES RESIDENT IN THE TAX JURISDICTION	RESIDENCE TAX JURISDICTION	MAIN ECONOMIC ACTIVITIES
Claro Enterprise Solutions, LLC	United States	Provision of services to non-related parties
Claro Video, LLC	United States	Provision of services to non-related parties
Fintel Holdings, LLC.	United States	Inactive
Hitss, Inc.	United States	Provision of services to non-related parties
Imusica, LLC.	United States	Other
Internet Holding, LLC.	United States	Holding of shares or other instruments
LATAM Holdings, Inc.	United States	Holding of shares or other instruments
LATAM Telecommunications, LLC.	United States	Holding of shares or other instruments
McCaw International (Brazil), LLC	United States	Holding of shares or other instruments
Ora Media, LLC.	United States	Other. Digital content production
Rivoli Reinsurance Company	United States	Insurance
Safelink Wireless, Inc.	United States	Provision of services to non-related parties
Takehollywood, Inc.	United States	Other. Digital content production
Technology and Internet Holding Co.	United States	Holding of shares or other instruments
Telmex Holdings, Inc	United States	Holding of shares or other instruments
Telmex Ventures USA, Inc.	United States	Holding of shares or other instruments
Telvista, Inc.	United States	Provision of services to non-related parties
TF Platforms, INC.	United States	Inactive
TF Property Holdings, LLC.	United States	Lease of fixed assets
TF Wireless Products, LLC.	United States	Other. Provision of services
Tracfone Wireless, Inc.	United States	Provision of services to non-related parties
Am Wireless Uruguay, S.A.	Uruguay	Provision of services to non-related parties
Flymay, S.A.	Uruguay	Inactive
Telstar, S.A.	Uruguay	Provision of services to non-related parties



# EXTERNAL VERIFICATION LETTER



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## Independent Limited Assurance Report

To the Board of Directors of de América Móvil, S.A.B. de C.V.:

### Scope of our Work

We have been engaged by América Móvil, S.A.B. de C.V. (“AMóvil” or the “Company” to perform a ‘limited assurance engagement,’ as defined by International Standards on Assurance Engagements, here after referred to as the engagement, to report on AMóvil’s selected performance indicators included and presented in the Sustainability Report (the “Report”) and mentioned in the Annex A; as of December 31, 2021.

Other than as described in the preceding paragraph, which sets out the scope of our engagement, we did not perform assurance procedures on the remaining information included in the Report, and accordingly, we do not express a conclusion on this information.

### Criteria applied by América Móvil, S.A.B. de C.V.

In preparing the performance indicators, América Móvil, S.A.B. de C.V. applied the criteria set forth in the GRI Standards (Criteria). Such Criteria were specifically designed for the construction and reporting of non-financial information; As a result, the subject matter information may not be suitable for another purpose.

### América Móvil, S.A.B. de C.V.’s responsibilities

América Móvil, S.A.B. de C.V.’s management is responsible for selecting the Criteria, and for presenting the Sustainability Report in accordance with that Criteria, in all material respects. This responsibility includes establishing and maintaining internal controls, maintaining adequate records and making estimates that are relevant to the preparation of the subject matter, such that it is free from material misstatement, whether due to fraud or error.

### EY’s responsibilities

Our responsibility is to express a conclusion on the presentation of the performance indicators included in Annex A based on the evidence we have obtained.

We conducted our engagement in accordance with the International Standard for Assurance Engagements Other Than Audits or Reviews of Historical Financial Information (‘ISAE 3000’), and the terms of reference for this engagement as agreed with América Móvil, S.A.B. de C.V on April 20, 2022. Those standards require that we plan and perform our engagement to obtain limited assurance about whether, in all material respects, the Subject Matter is presented in accordance with the Criteria, and to issue a report. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our limited assurance conclusions.

### Our Independence and Quality Control

We have maintained our independence and confirm that we have met the requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants and have the required competencies and experience to conduct this assurance engagement.

EY also applies International Standard on Quality Control 1, Quality Control for Firms that Perform Audits and Reviews of Financial Statements, and Other Assurance and Related Services Engagements, and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.



## Description of procedures performed

Procedures performed in a limited assurance engagement vary in nature and timing from and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Our procedures were designed to obtain a limited level of assurance on which to base our conclusion and do not provide all the evidence that would be required to provide a reasonable level of assurance.

Although we considered the effectiveness of management's internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls. Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

A limited assurance engagement consists of making enquiries, primarily of persons responsible for preparing the performance indicators and related information and applying analytical and other appropriate procedures.

Our procedures included:

- Conducted interviews with personnel to understand the business and reporting process
- Conducted interviews with key personnel to understand the process for collecting, collating and reporting the subject matter during the reporting period
- Checked that the calculation criteria have been correctly applied in accordance with the methodologies outlined in the Criteria
- Undertook analytical review procedures to support the reasonableness of the data
- Identified and testing assumptions supporting calculations
- Tested, on a sample basis, underlying source information to check the accuracy of the data

## Conclusion

Based on our procedures and the evidence obtained, we are not aware of any material modifications that should be made to the performance indicators as of December 31, 2021; for it to be in accordance with the Criteria.

Mancera, S.C.

A Member Practice of Ernst & Young Global Limited

Saúl García Arreguín

Partner

May 31<sup>st</sup> 2022; Mexico City





Annex A América Móvil’s performance indicators

GRI / IP	Disclosure title	Scope of the information	Compliance level (Clauses)	Reported information	UNIT
302-1	Energy consumption within the organization	Mexico <sup>1</sup>	a, b, c, & e	2,310,211	MWh of electric energy
				37,605,596	Liters of gasoline
				6,207,467	Liters of Diesel
				342,716	Liters of LP gas
		Brazil		1,442,714	MWh of electric energy
				6,680,082	Liters of gasoline
				2,722,655	Liters of Diesel
				2,629,748	Liters of Ethanol
				0	m³ CNG
		Colombia		491,255	MWh of electric energy
				686,833	Liters of gasoline
				9,586,597	Liters of Diesel
		South Cone		449,753	MWh of electric energy
				93,326	Liters of gasoline
				2,702,004	Liters of Diesel
				18,033	Liters of biodiesel
				9,117	m³ of natural gas
		Andean Region		310,778	MWh of electric energy
				534,033	Liters of gasoline
				1,915,066	Liters of Diesel
		Central America		410,008	MWh of electric energy
				1,565,446	Liters of gasoline
				7,514,391	Liters of Diesel
		Caribbean		265,924	MWh of electric energy
				2,854,917	Liters of gasoline
				8,259,063	Liters of Diesel

<sup>1</sup> Includes information from the United States.



GRI / IP	Disclosure title	Scope of the information	Compliance level (Clauses)	Reported information	UNIT
		Europe		133,239	Liters of L.P. gas
				803,948	MWh of electric energy
				1,108,944	Liters of gasoline
				5,129,990	Liters of Diesel
				147,236	Liters of L.P. gas
				15	m³ CNG
				1,476,071	m³ of natural gas
(305-1)	Direct GHG emissions (Scope 1)	Mexico <sup>2</sup>	a, d & g	123,344	Ton CO <sub>2</sub> e
		Brazil		34,837	Ton CO <sub>2</sub> e
		Colombia		30,386	Ton CO <sub>2</sub> e
		South Cone		11,023	Ton CO <sub>2</sub> e
		Andean Region		11,187	Ton CO <sub>2</sub> e
		Central America		29,736	Ton CO <sub>2</sub> e
		Caribbean		37,665	Ton CO <sub>2</sub> e
		Europe		21,316	Ton CO <sub>2</sub> e
305-2	Energy indirect GHG emissions (Scope 2)	Mexico <sup>4</sup>	a, d & g	941,542	Ton CO <sub>2</sub> e
		Brazil		382,632	Ton CO <sub>2</sub> e
		Colombia		70,557	Ton CO <sub>2</sub> e
		South Cone		168,960	Ton CO <sub>2</sub> e
		Andean Region		193,062	Ton CO <sub>2</sub> e
		Central America		124,295	Ton CO <sub>2</sub> e
		Caribbean		133,502	Ton CO <sub>2</sub> e
		Europe		176,340	Ton CO <sub>2</sub> e
305-5	Reduction of GHG emissions	All subsidiaries	a, c, d & e	11.86	Percentage of reduction absolute CO <sub>2</sub> Emissions
102-22	Women on the board of directors	América Móvil Corporate	a (V)	3	Number of women on the board of directors
IP <sup>3</sup> (405-2)	Remuneration by gender	Mexico (Telcel) Brazil	-	2,493,083	Executive level (base salary only) Men
				3,864,678	Executive level (base salary + other cash incentives) Men

<sup>2</sup> Includes information from the United States.

<sup>3</sup> America Movl's own indicator based on GRI.





GRI / IP	Disclosure title	Scope of the information	Compliance level (Clauses)	Reported information	UNIT
		Colombia		497,025	Management level (base salary only) Men
				683,499	Management level (base salary + other cash incentives) Men
				220,954	Non-management level (base salary only) Men
				301,124	Non-management level (base salary + other cash incentives) Men
				1,805,763	Executive level (base salary only) Women
				2,706,956	Executive level (base salary + other cash incentives) Women
				460,005	Management level (base salary only) Women
				645,694	Management level (base salary + other cash incentives) Women
				175,846	Non-management level (base salary only) Women
				245,591	Non-management level (base salary + other cash incentives) Women
403-1	ISO 45001 certifications obtained during the reporting period	Bulgaria, Colombia HITSS, Colombia COMCEL, Chile, Ecuador, Mexico, Croacia, Serbian, Slovenia, Republic of North Macedonia Puerto Rico	a	11	Number of subsidiaries with certifications
IP <sup>4</sup> (418-1)	Fines generated by cybersecurity incidents	All subsidiaries	d	0	Number of fines generated by cybersecurity incidents

<sup>4</sup> America Movil's own indicator based on GRI.



**AMX**  
**SUSTAINABILITY**  
Enabling a Better World

**2021**  
SUSTAINABILITY  
REPORT