



# **Environmental Policy**

## América Móvil

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### 1. Introduction

América Móvil, S.A.B. de C.V., and its subsidiaries (“América Móvil” or “the Company”) confirms and formalizes its commitment with the values and principles of Corporate ethics, transparency and environmental protection.

The Company’s subsidiaries are subject to diverse environmental regulations in the different countries where we operate. The infringement of these provisions within our operations or in our value chain could lead to several sanctions, at a personal and corporate level, as well as important reputational impacts for our brands.

For this reason, and regardless of strict local compliance, we have established this Environmental Policy in order to prevent environmental risks and harmonize operational and decision making criteria in consistency with América Móvil's values and sustainability strategy.

This Environmental Policy lists the main commitments of the Company to bring into focus the environmental efforts in all our operations.

### 2. Objective

This Environmental Policy aims to establish applicable principles and guidelines to all our operations in environmental matters, in order to provide a framework to conduct the efforts made in the Company’s operations on a daily basis, towards a common goal: to manage our decision-making processes and our daily operations with the highest sense of environmental care and responsibility.

### 3. Scope

This Environmental Policy is applicable and mandatory for you and for each and every one of our employees and Third Parties, in each of the countries in which we operate, so it is very important to know, to understand and to put into practice all the principles and guidelines contained here.

### 4. Definitions

**Life cycle analysis.** Methodology used in evaluating the potential environmental impact of a product, process or activity, throughout its life cycle, by quantifying raw material inputs, discharges or environmental emissions, as well as the impact on the health of the inhabitants of the ecosystem that is being evaluated.

**Value chain.** Concept that recognizes each stage of the process of elaboration and sale of a product or service as a determinant for its complete valorization; from the relationship with raw material suppliers to the way in which the final product is delivered to consumers.



**Stakeholders.** Any person who is impacted, directly or indirectly, by América Móvil's operations is a stakeholder.

**Environmental footprint.** This is an indicator of the environmental impact generated by the activities or operations of an entity that uses the resources existing in the planet's ecosystems, compared to the capacity of the same ecosystem to regenerate these resources.

**Thermovaluation.** When the caloric capacity of a product can be used as its main attribute.

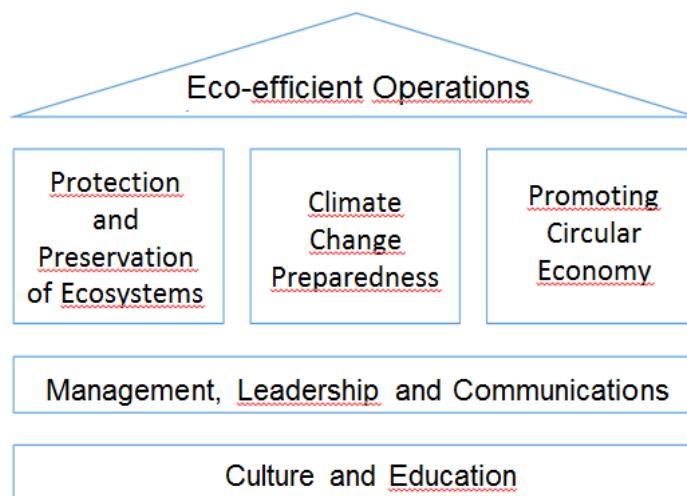
**Externality.** When the total costs or benefits associated with a product or service are not entirely reflected in its market price.

### 5. General Guidelines

The purpose of América Móvil is to empower people through connectivity and to constantly work, both within the Company and with our value chain, to ensure that we are eco-efficient, that is, doing this in the most environmentally friendly way as possible.

To achieve this, our strategy comprises two main axes: 1) minimizing the environmental footprint of our operations, services and products throughout their life cycle, and 2) compensating our environmental externalities so that the Company's environmental footprint gets closer to zero.

Likewise, the commitments of our strategy focus on three fundamental fronts: the protection and preservation of ecosystems; climate change preparedness, and promoting the circular economy, which are interrelated, as shown in the following graph:





This policy is based on the education and culture of all the stakeholders related to the Company's environmental footprint, the development of robust environmental management systems with the definition of clear and ambitious goals in the short, medium and long term; as well as on the compliance with the rules and regulations applicable to each operation.

All the components and commitments of this policy are detailed below.

### 5.1 Protection and Preservation of Ecosystems

At América Móvil we will always strive to make our operations as environmentally friendly as possible. For this reason, we constantly analyze the Company's environmental externalities, in order to find options for minimization, neutralization and / or compensation.

These analyzes include: the minimization of the use of drinking water and the maximization of the use of treated water; the treatment of water discharges from our operations on site or through third parties; minimizing the generation of hazardous waste and always disposing of it in accordance with the applicable laws in each region; and, the preservation of biodiversity, among others.

Any operation that could end up having a negative externality on the ecosystem of a neighboring community, must establish consultations with the representatives of said community, in order to agree on the appropriate mitigation plans, as well as to monitor the implementation of such plans.

### 5.2 Climate Change Preparedness

The physical, social and legislative impacts associated with climate change pose challenges that we must face, as a company and as society. This pillar has two lines of action:

#### Mitigation

- Derived from the efficiency programs mentioned in the previous pillar, at América Móvil we are committed to reduce our carbon footprint to an economically viable minimum. It is the intention of América Móvil to adhere to initiatives that limit the increase in global average temperature through the companies' mitigation strategies.
- We also make efforts to minimize the use of chemicals, gases, products or processes that may have negative impacts on global warming and we are committed to constantly evaluate the use of more environmentally friendly alternatives.



### Adaptation

- At América Móvil we constantly model risk scenarios associated with the adverse effects that climate change could generate on the business. These modeling should be carried out at least once a year and the risks associated with them should be assessed as well. The risks assessment must consider social, environmental and economic components when determining the priority risks for the Company's management. Likewise, the financial impacts associated with such risks should be determined and strategies must be designed to manage them.
- Valuation and risk management assessments allow us to detect business or social responsibility opportunities associated with climate change. These opportunities should also be evaluated in order to be able to benefit from them.

The climate change mitigation and adaptation plans should be presented to those officers that given their functions should participate, as well as to the Company's Board of Directors, for their evaluation, comments and approval. Once approved, the Corporate Sustainability Committee follows up the implementation of the work plans presented, as well as the key performance indicators associated with them, and periodically reports them to the Senior Management and the Board of Directors.

All material and emerging climate change related risks that have a potential adverse impact on América Móvil's operations, even if they are local, will be integrated into the corporate risk assessment and management processes, so that these risks or opportunities are integrated into the Company's corporate strategy.

### 5.3 Promoting Circular Economy

At the Company, we promote the use of circular economy schemes, whenever possible, since it is essential to achieve the goals of our two previous pillars. This pillar has as its main component the minimization of the footprint that extends throughout the value chain, through the following actions:

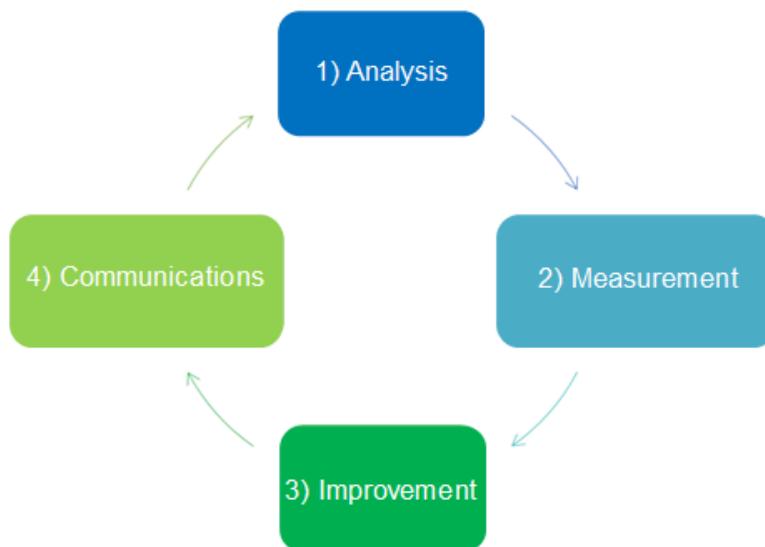
- **Redisigning.** Whenever possible, the Company and our suppliers must favor product or process designs that avoid the generation of non-recoverable waste, minimizing the use of single-use materials and maximizing the incorporation of recycled materials. We should privilege the reuse of equipment, even over recycling, if in the life cycle analysis of the product it is shown that the first option is more environmentally friendly than the second.
- **Recycling.** We actively promote the recycling of the products we offer. The Customer Service Centers are natural collection points, where we promote shared responsibility with our suppliers and clients, joining efforts with the value chain to promote the circular economy in the most profitable way.
- **Compensating.** By promoting recycling events or creating synergies that support waste collection, through alliances or foundations, we identify



compensation options for waste that could not be recycled, thermovalorized or composted. Our intention is to achieve zero generation of waste.

### 5.4 Management, Leadership and Communications.

The strategy to minimize the environmental footprint of this policy is based on the principles of performance management and continuous improvement, as shown below, based on four fundamental steps:



- 1) **Analysis.** We define the key elements or indicators for the three pillars of the strategy, so that each of our operations is able to establish targets and continuous improvement programs. The product or process environmental assessments must be based on their complete life cycle, that is, from the primary extraction to the final disposal of the products or processes associated with our services. While doing this, we should also consider risk analysis and environmental externalities for the Company's material issues.
- 2) **Measurement.** Our operations should establish baselines for setting goals, as well as to manage and communicate progress.
- 3) **Improvement.** This policy is based on continuous Improvement. We should always seek to favor processes with the least environmental footprint, the greatest social benefit and as profitable as possible.
- 4) **Communication.** América Móvil we must report ethically and transparently our performance on environmental issues at least once a year; and more frequently if a particular stakeholders request it. The Company's



communication strategy is based on the MRV principles, which stand for: measurable, reportable and verifiable.

In this sense, those subsidiaries that determine in the Analysis phase that they have a considerable potential impact for the environment, require to establish an environmental management system, in order to minimize possible impacts of its operations. The environmental management system will be based on the potential impacts identified in the Analysis phase, that is, if the greatest impact is energy consumption at a site, the management system should focus on this issue as a priority.

### 5.5 Value Chain

At América Móvil apply this policy beyond our operations, as it is our responsibility to oversee that the Company's value chain, especially suppliers, also have environmental policies of at least the same degree of depth and commitment as ours.

América Móvil expects its suppliers to have a similar commitment towards the environment to that of our Company and throughout its value chain, especially in its suppliers; direct and indirect.

We must constantly carry out supply chain assessments of our direct and indirect suppliers, to identify those that can have a high impact on the environment. We request a higher degree of depth in their environmental management, according to the potential impact of their activities, as shown in the table below.

Supplier's environmental impact level	Requirements to be a supplier of América Móvil
<b>From null to minimum</b>	<ul style="list-style-type: none"><li>To have an environmental policy that covers at least the same points as this policy.</li></ul>
<b>Average</b>	<ul style="list-style-type: none"><li>All the points listed above.</li><li>An annual report on environmental performance management.</li></ul>
<b>Above average</b>	<ul style="list-style-type: none"><li>All the points listed above.</li><li>To have an internationally recognized environmental management system.</li></ul>

### 5.6 Transparency and Accountability

Our stakeholders, including the community, investors, consumers and corporate clients, are increasingly interested in the environmental impact of companies from whom they buy products and services. For this reason, beyond legal compliance, at América Móvil we are committed to developing and reporting reliable indicators on environmental performance every year in all our operations.



For América Móvil, reporting environmental performance information requires the same care as financial information, in terms of clarity, transparency, truthfulness and accuracy, and must be supported by evidence. Since this information is included in public documents that our investors, consumers and corporate clients consult in their decision-making.

Therefore, it is our responsibility to periodically and accurately feed the information management system, in accordance with our principles of honesty and transparency. As with financial information, any activity that is aimed at altering, falsifying, destroying, hiding or modifying environmental accounting records is expressly prohibited.

### 6. Prevention

To prevent any environmental risk, our commitments as a Company and yours as an Employee of América Móvil or as a Third Party are:

- i. To adhere to our Code of Ethics, this Environmental Policy, the other applicable policies of the Company, as well as the applicable local legislation on environmental matters in each of the countries where we operate.
- ii. To always consider risk analysis and environmental externalities in decision-making, including options for minimizing, neutralizing and/or compensating for environmental impacts.
- iii. To promote the adoption of practices that favor processes with the least environmental footprint, the greatest social benefit and as profitable as possible.
- iv. To minimize the environmental footprint that extends throughout the value chain, requiring that our suppliers have environmental policies with at least the same level of depth and commitment as ours, and that they monitor compliance with such environmental standards throughout of their own value chain.
- v. To comply with all environmental information requirements applicable to the Company, since information is presented publicly to clients, investors and regulators, so any omission, falsehood or lack of transparency in our indicators is strictly prohibited.
- vi. To adopt internal controls and to report, if necessary, to the Whistleblower Portal and/or to the corresponding authorities, those cases in which any Employee or Third Party commits an act that violates the Company's Code of Ethics, this Environmental Policy or the law.



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### **7. Evaluation, Supervision, Verification and Environmental Policy Compliance Audit.**

The Compliance Office along with the Corporate Sustainability Division will be in charge of supervising, monitoring and, where appropriate, auditing the proper compliance with the provisions established in this Environmental Policy, and will periodically evaluate its effectiveness to perform the necessary updates for its optimal operation.

The Sustainability area is also responsible for updating periodically the sustainability strategy, which includes, among others, a series of measures that aim to prevent environmental risks in the operation and in our supply chain.

Audits will be carried out periodically and randomly to the different areas of the Company, if necessary.

All Company Employees must be committed to supporting and collaborating with the teams in charge of performing those audits without hindering or obstructing the audit processes and refrain from providing false or incorrect information.

Remember that it is everyone's obligation to enforce and comply with this Environmental Policy, as well as to report any act that goes against it through the Whistleblower Portal <https://denuncias.americamovil.com/>.

### **8. Training and Outreach**

As mentioned at the beginning of the document, this policy is based on the effective training of all the Company's stakeholders in order to achieve a cultural change towards respect and protection of the environment. For this reason, América Móvil will offer its Employees and Third Parties online or face-to-face courses, which will be announced by the official means of communication of the Company in order to prepare them so that they can understand the concepts, scope and best practices. It is our responsibility to participate in the assigned sessions, as well as to comply with requested times and evaluations.

Also, provide an email to receive questions and concerns regarding this policy that may arise on a daily basis: [contacto-rse@americamovil.com](mailto:contacto-rse@americamovil.com).

### **9. Sanctions**

Non-compliance with this Environmental Policy, both for Employees and for Third Parties, may include administrative, labor or even criminal penalties, depending on the severity of the act, and will be sanctioned in accordance with the applicable internal labor regulations and/or applicable law.



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Within América Móvil, the Ethics Committee of each subsidiary will be the last instance in determining the penalties in case of non-compliance with this Policy, notwithstanding that such non-compliance may be also sanctioned by applicable legislation and authorities.

### 10. Whistleblower Portal

To report any breach of this Environmental Policy or of our Code of Ethics, we provide you a Whistleblower Portal available at: <https://denuncias.americamovil.com>.

You, like each and every one of América Móvil's Employees and Third Parties, have the right and the obligation to report to our superiors, the Compliance Office or directly through the Whistleblower Portal, any conduct that violates this Code of Ethics or any applicable internal law, regulation, policy or procedure and any unethical conduct in general.

Likewise, it is our duty to cooperate with any internal or external investigation and maintain its confidentiality. Employees who make any false or malicious complaint may be subject to disciplinary sanctions.

Remember that not reporting a serious ethical breach could lead to disciplinary consequences, since you could be covering up an unethical incident or a crime. Anonymous complaints may be filed if the complainant wishes to do so, however, it is recommended to leave contact details to follow up on the investigation.

América Móvil has taken all the reasonable and justified measures to protect the confidentiality of the complaint and the complainant, as well as to guarantee that there will be no retaliation against you for reporting. No provision within this Code shall be understood as an obstacle for individuals to file complaints directly with the competent authorities. In such cases, it is recommended to give notice to our Legal Department, so that, they cooperate with the corresponding authorities, if necessary.

All complaints will be overseen by the Compliance Officer of América Móvil, who in turn reports to América Móvil's Audit and Corporate Practices Committee. The Compliance Office is the body in charge of supervising and operating the Whistleblower Portal, and of sending the corresponding complaints to the Ethics Committees within each subsidiary for their due investigation.