



Stakeholder Engagement Guidelines América Móvil

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1. Introduction

América Móvil, S.A.B. de C.V., and its subsidiaries (hereinafter “América Móvil” or “the Company”) confirm and formalize their commitment to the values and principles of business ethics, transparency and sustainability.

Sustainability has become increasingly important because it is a model for institutions of how to generate economic value while at the same time consolidate as a development catalyst and a mean for people's quality of life improvement.

At América Móvil, we understand sustainability as the way in which each of the collaborators carry out their activities aligned with integrity practices. At the same time evaluating and minimizing the impact on the environment and the communities in which we operate, maximizing business development, in order to ensure favorable conditions for our company in the long term

Being sustainable allows us to ensure the company continuity in the long term, through a comprehensive impact and risk management, in all three dimensions:

- Social, where we carry out practices to respond to the needs and expectations of our collaborators, suppliers and business partners, in order to contribute to improving their lives;
- Environmental, where we promote actions for the efficient use of natural resources and reactivate the ecosystem where it operates; and
- Corporate Governance, where we apply our business principles, legality and transparency to strategic audiences fostering accountability and transparency.

Today, given the increase in availability of and access to information and the emergence of Civil Society as a new force, combined with the increasing connectivity and social networks, has increased the visibility of the impact that the company's activities have on societies in general. The coordination and communication between these groups multiplies the possible impact on reputation in companies

These circumstances call for the implementation of adequate management strategies with a particular focus on identifying and managing relationships with stakeholders beyond the traditional boundaries of shareholders, employees and customers. By engaging with the relevant stakeholders, companies can minimize reputational risks, improve operational efficiency via smooth collaboration with local communities and authorities, and strengthen their social license to operate by gaining greater respectability and credibility.

Having clear guidelines stakeholders relations allows the strategy to be implemented at the corporate level and within the subsidiaries under the same sustainability scheme, seeking to ensure that planning and execution have a systematic approach, with clear metrics for continuous improvement. For this reason, today more than ever, teams in charge of carrying out corporate relations responsibilities at América Móvil and its subsidiaries is relevant to meet the company's objectives in a sustainable manner, contributing to business continuity

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in the long term as well as adding value to integral society development and the environment.

2. Objective and Scope

This document represents a tool that allows those responsible for the corporate relations and liaison functions in América Móvil and its subsidiaries to understand, plan, implement and locally evaluate policies and procedures related to their responsibilities, which then must be tailored to the needs of the different company's relevant stakeholders.

The applicable legal framework in each jurisdiction, as well as by the Company's Code of Ethics and policies governs all institutional relations and liaison activities of América Móvil and its subsidiaries.

Local teams should use these guidelines to manage, coordinate, supervise and/or advise on the relationship developed between América Móvil and its subsidiaries with government audiences, chambers, and business organizations, academia, research institutions, and non-governmental organizations.

2.1 Functions and scope of Corporate Relations Divisions

The objective of the institutional relationship and liaison of América Móvil and its subsidiaries in each of the countries where it operates is to establish and ensure constructive long-term relationships with key stakeholders to benefit the fulfillment of the company's objectives, the promotion of sustainability within these activities and the quality of the services we provide to our final users.

All the activities carried out to achieve this objective are ruled by the local regulations in each country, as well as América Móvil's Code of Ethics and the Guidelines established in this document.

For the purposes of this document regardless of the denomination in each country, the areas will be considered as Corporate Relations when they perform the following functions:

a) Build relationships with regulatory bodies, developing and maintaining a good communication with them, seeking an institutional, transparent and permanent dialogue that contributes to the development of an appropriate regulatory environment for the company for the benefit of the final users and the quality of our services.

b) Contribute to the identification, analysis and proposal of modifications to the industry's regulatory framework, which guarantee legal certainty and regulatory stability by encouraging the investments required in the deployment of infrastructure and the provision of services that affect the quality of life of people and companies in the countries where we operate.

c) Represent the Company before the competent governmental organisms.

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d) Represent the company in Chambers and Business Associations; academic institutions, research institutes and Think Tanks; and civil society organizations related to América Móvil's activities, always under the terms of the Code of Ethics and these present Guidelines.

e) Closely collaborate with the different areas of the company, especially with the legal, regulatory, compliance, sustainability, communication and marketing divisions, as well as with the regional directors in the fulfillment of the Company's goals.

f) Monthly report through the mechanism indicated in this document on the identification of possible risk situations that may arise.

g) Participate together with the communication areas in liaison with the media, as well as in the case of crisis management and containment in accordance with the América Móvil's crisis manual.

Corporate relations activities are related and carried out in coordination with the responsible areas for obtaining and complying with licensing, permits, and/or authorizations requirements according to the applicable legal framework in each case. Coordination mechanisms and participation in these activities will be established by each country and/or subsidiary.

Obtaining the formalities and permits required for the installation and operation of infrastructure will be ruled by the guidelines established in the Anti-Corruption Policy and this document and will be carried out in coordination with the legal and regulatory divisions, together with the engineering team in each of the countries where the Company operates. In the cases where such procedures are carried out through third parties, strict compliance with the guidelines outlined in the Anti-Corruption Policy and the regulations in force in each country must be ensured.

2.2 Potential Risk Report

Following América Móvil's *Sustainability, Risks and Crisis Document*, each person in charge of corporate relations in each of the countries and/or subsidiaries will report in a monthly basis to the Regulatory division, under the established methodology, the risks identified, vulnerability, level of urgency and plans to manage, transfer and mitigate the most relevant risks related to the Corporate Relations areas:

a. Identified risks - Relates to the possibility that a situation could eventually lead to an adverse event, changes in regulation, a special situation and/or a crisis or to any eventuality that may negatively affect the operation.

b. Risk level by probability and impact - Classification of detected risks based on the probability to materialize and the impact they could have on the operation.

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c. Vulnerability - It relates to the risk and the weakness or exposure degree of our operations to external factors. They are also those failures or omissions that could be exploited by third parties.

d. Urgent attention risks matrix – Risks that considering the level of probability, impact, and vulnerability, must be addressed as a priority, indicating the actions and those responsible for transferring, mitigating, or managing the risk.

If any risk materializes or a special situation arises, or a crisis that could affect the long-term relations with the relevant stakeholders for América Móvil and its subsidiaries or the continuity of services the situation must be reported in an extraordinary manner.

3. Definitions

Stakeholders or interested party. It relates to any person who is directly or indirectly affected by América Móvil's operations.

Industry Associations and business chambers. The industry associations, commerce chambers, and the confederations that group them are institutions of public interest that are autonomous, with legal personality and asset ownership. They are established under the provisions of the laws of business chambers and their confederations in each country and are intended for its members to support each other to address problems and promote common objectives achievement through the strength of being formally united.

Academia, investigation institutes and think tanks. They are social and/or academic organizations that plan, carry out, and execute research on certain topics to present proposals intended to support action.

Civil Society. A group of individuals who, assuming their role as citizens, carry out certain actions to influence public or private spheres.

Rating Agencies. These are independent companies dedicated to assess the creditworthiness, risks and recently sustainability indicators of the different issuers (both public and private entities).

Investment Funds. An investment fund is a supply of capital belonging to numerous investors used to collectively purchase securities while each investor retains ownership and control of his own shares in search for profitability. An investment fund provides a broader selection of investment opportunities, greater management expertise, diminishing risk and lower investment fees than investors might be able to obtain on their own.

4. General Guidelines of Stakeholder Engagement

This section allows members of the América Móvil's Corporate Relations division and those of its subsidiaries to become familiar with policies and procedures to establish long-term positive relationships with key stakeholders.

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In each item, general execution criteria can guide employees in their decisions and strengthen the achievement of objectives, according with América Móvil's values and principles.

4.1 America Móvil's Values and Principles

Our values and corporate ethics principles are the attributes that differentiate and guide us. We always keep them in mind and put them into practice on a daily basis as an essential foundation of our culture of excellence, productivity and leadership:

- Honesty

We are committed to maintaining the highest ethical standards. We must act honestly and with integrity at all times. By conducting ourselves with integrity, we foster confidence and trust among ourselves and in our relationships with our customers, suppliers, and other business partners. Such conduct also promotes respect towards our organization, which ultimately contributes to the success of our business.

- Human Development

We believe in the unlimited potential for the personal and professional growth of all people. This is why we respect and promote human rights in all of our activities.

- Respect

We value all our employees, customers, suppliers and commercial partners. We respect human rights and we treat everyone the same way. We do not tolerate any form of discrimination, and we are open to different cultures, customs, and beliefs, all of which add value to our business community.

- Business Creativity

We foster corporate creativity as a means to provide society with solutions to address the social problems affecting the countries in which we operate, and we put this creativity in practice in our daily activities.

- Productivity

We are committed to improving quality, streamlining and optimizing our productive processes by controlling costs and expenses and adhering to the highest worldwide standards for our industry.

- Optimism and a Positive Attitude

We believe that when facing adversity, a positive attitude and an optimistic perspective are essential for solving problems.

- Legality

We operate according to applicable laws and regulations in every country where we have a presence. We strictly abide by and comply with all of these laws, regulations, and other rules in effect in each of our markets. We aim to be considered as a Company that operates with strict adherence to the law at all times. We also abide by our internal policies.

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- Cost Management

We take care of our company's assets as if they were our own. They are the product of our work and intended for the benefit of our customers and our society.

- Sustainability

Our commitment is to be a change agent that promotes inclusion, economic growth and wellness in the countries where we operate, while seeking a comprehensive balance among economic, social and environmental aspects of our operation. Therefore, we aim to comply with the best local and international practices.

4.2 Relationship Guidelines with Authorities

América Móvil has no ideological, political or partisan affiliation; however, it respects the right of its employees to collaborate civically in professional non-profit associations and citizen organizations that promote legal and responsible exercise of political rights.

- All employees enjoy absolute freedom to exercise their political rights without being pressured, directly or indirectly, to do so in favor of a specific party or person.
- However, in order to allow the Company to comply with the applicable law, the participation of our employees in political and/or electoral processes must be strictly personal, outside of working hours and refraining to reference América Móvil either implicitly or explicitly; and may not under any circumstances involve the use of financial resources or other assets of the Company.

In addition, laws and regulations in some of the countries where we operate contain provisions that prohibit América Móvil and its employees from making donations, contributions or other payments, whether in cash or in kind, to political parties, employees of political parties and candidates for popularly elected positions, including those of other countries. Therefore, the financial resources of our Company cannot be used to support any candidacy for a political position.

Anticorruption Policy

- **Objective**
 - To establish the applicable anticorruption principles and guidelines in order to have an adequate and effective control, surveillance and auditing system that allows América Móvil and its subsidiaries to guarantee that any activity carried out in it or on its behalf is based on our Code of Ethics and in compliance with the law.
- **Scope**
 - This policy applies to each of our employees, representatives, suppliers, retailers, contractors and other business partners in each of the countries where we operate, who are bounded to know, understand and put into practice the principles contained herein for publicize that América Móvil and all the people who work in the Company, as well as its stakeholders, fight against corruption in their sphere of influence

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- At América Móvil we understand corruption as any abuse of power to obtain any benefit for the Company, staff or a third party. It is important to note that the act of corruption is considered as one even when the expected benefit or advantage is not obtained.
- Therefore, according to América Móvil's anti-corruption policy, acts of corruption include unethical and illegal conduct such as bribery, collusion, conflicts of interest, facilitation payments, fraud, extortion, and influence trafficking, the use of false or privileged information and money laundering, among others; whether or not they involve a public officer, but also if they are committed by any employee, supplier, representative, distributor, contractor or any other commercial partner, to the detriment of the Company or any third party.
- The aforementioned actions are prohibited and may constitute a felony regardless of whether public officials are involved. Lastly, América Móvil prohibits any attempt to help or hide acts of corruption regardless of whether you make a profit or not.
- Likewise, "occupational fraud" is understood under acts of corruption and lack of ethics, understanding it as the intentional use of the job for the personal enrichment or of a third party or other entity through the improper use of resources or Company assets.

América Móvil's Anticorruption Policy Fundamental Principles:

Adherence to our Code of Ethics, our Anti-Corruption Policy, other applicable policies, the international conventions for the fight against Corruption, the international laws including the FCPA and the local applicable legislation in each of the countries where we operate.

- i. Adherence to our Code of Ethics, our Anti-Corruption Policy, other applicable policies, the international conventions for the fight against Corruption, the international laws including the FCPA and the local applicable legislation in each of the countries where we operate.
- ii. Compliance with all financial reporting standards applicable to the Company, since omission, falsity or lack of transparency in our accounting books and records constitutes a felony, and therefore it is strictly prohibited.
- iii. Carry out all interactions with public officers in accordance with the provisions of the Anticorruption Policy, in an open and transparent manner to minimize the perception of any corrupt activity; also, all interactions must be properly documented and recorded.
- iv. Carry out all negotiations, purchases and transactions in accordance with our internal policies and procedures, keeping all the records to be reviewed in the event of an audit.
- v. Ensure that all payments made on behalf of América Móvil are legal, against official receipts or vouchers and always linked to goods, rights or services effectively provided to and received by the Company.
- vi. Adopt internal controls and report, those cases in which an employee or third party commits an act that violates our Code of Ethics, Company policies or the law, through the Whistleblower Portal and/or to the corresponding authorities when necessary.
- vii. Promote practices to fight corruption along the value chain, training staff on preventive measures and carrying out outreach campaigns

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Likewise, América Móvil prohibits its employees or third parties, either directly or in their name and representation to:

- viii. Offer, give, promise, pay, authorize payment, or receive, directly or indirectly, money, gifts, entertainment and hospitality or anything of value or service from or to any public official or third party, for the purpose of influencing or being influenced in the decision making process to obtain any advantage, personal/Company benefit.
- ix. Enter into contracts with third parties that may represent an instrument to carry out a bribe. We should not negotiate or make payments to third parties if there is any indication that these people may carry out any type of bribery on our behalf.
- x. Provide gifts, entertainment and hospitality or anything of value, to third parties, public officers or their families, in contravention with the provisions of the Anticorruption Policy and the Gifts, Entertainment and Hospitality Policy.
- xi. Receive gifts, entertainment and hospitality or anything of value, from third parties, public officers or their families, in contravention with the provisions of the Anticorruption Policy and the Gifts, Entertainment and Hospitality Policy.
- xii. Make donations or contributions, in money or in-kind, to political parties or members of electoral campaigns, with Company resources or on its behalf.
- xiii. Participate as an author, co-author, instigator, accomplice, cover-up or in any other way in the commission, attempted commission, association or conspiracy to commit any act of corruption.

Evaluation, Supervision, Verification and Policy Compliance Audit Procedures

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

The Compliance Office is also responsible for periodically evaluating its own Integrity and Compliance Program, which includes, among others, a series of measures that aim to prevent acts of Corruption. Audits will be periodically and randomly carried out 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.

To promote compliance with the América Móvil Integrity and Compliance Program, and facilitate the process of filing a complaint, we provide to our employees, customers, suppliers, contractors, retailers, and other business partners the Whistleblower Portal available at <https://denuncias.americamovil.com/>.



4.3 Relationship Guidelines with other Stakeholders

Industry Associations and business chambers

Participation of those representing América Móvil and its subsidiaries in associations, chambers and business organizations is based on the following guidelines:

- Industry associations, chambers, and business organizations are those who represent the private sector and are ruled by local country laws.
- Local managers and teams in charge of these stakeholders' liaison will regularly participate in business organizations and associations.
- Su participación se basa en los principios de transparencia y se debe llevar a cabo en estricto cumplimiento de lo señalado en el código de ética.
- Participation is based on the transparency principles and must be carried out in strict compliance with the provisions of the Code of Ethics
- Participation is limited to activities and services of the organizations and business associations and does not represent at any time an endorsement or support of the organizations' entire agenda.
- Fees paid to business organizations cannot be used for political contributions.
- Information shared with these organizations will be the one strictly necessary to address issues of interest and will be based on the public information available from the company.
- All the participation in chambers and business organizations will be carried out following the provisions of our Economic Competition Manual, the economic competition regulations in force in each country where we operate and in no way should be used to help avoid compliance with the law.

Academy, Research Institutes and Think Tanks

The relationship of representatives of América Móvil and its subsidiaries with academic, research and think tank institutions is based on the following guidelines:

- The independence of academic, research and Think Tanks institutions and their contributions to knowledge are recognized and promoted.
- Any entailment with these institutions is based on the principle of transparency and must be carried out in strict compliance with the provisions of the Code of Ethics.
- The liaison does not represent at any time an endorsement or support of the entire agenda within these institutions.
- Information shared with these institutions will be the strictly necessary to address the topics of interest and will be based on the public information available from the Company. If it is necessary to provide additional information in very specific situations, confidentiality agreements will be signed in accordance with internal regulations and in coordination with the legal division.

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Civil Society

The relationship of representatives of América Móvil and its subsidiaries with civil society is based on the following guidelines:

- Civil society organizations represent public interest causes and contribute to the constant improvement of people's lives, the environment and communities.
- Any entailment with these institutions is based on the principle of transparency and must be carried out in strict compliance with the provisions of the Code of Ethics.
- Partnerships or alliances made with these organizations are part of the sustainability efforts so that the Company can generate a continuous positive impact on the communities where it operates and its environment, thus reaffirming its commitment to be a change agent fostering inclusion, economic growth and well-being.

Rating Agencies and Investment Funds

In América Móvil we recognize the role carried out by rating agencies and investment funds.

- We provide information to rating agencies and investment funds in a transparent manner. The Company fosters an active dialogue with shareholders and investment funds to ensure that a diversity of perspectives is carefully considered. The information released by the Company is publicly available. If additional information is required, approval from the legal division is needed.
- Relations with rating agencies and investment funds is an exclusive responsibility of América Móvil's corporate, therefore, all subsidiaries if needed will require to transfer any request or related matter.
- All financial and investment relation is responsibility of the Investor Relations Area.
- Relation with other types of rating agencies (non-financial) is responsibility of Sustainability Area.

5. Training and Outreach

For us, in América Móvil it is very important that these Guidelines are fully understood and put into practice to foster a culture of transparency, ethics and values. Para nosotros es muy importante comprender y poner en práctica lo descrito en estos Lineamientos y en aras de fomentar una cultura de transparencia, ética y de valores, América Móvil ofrecerá a sus Empleados y Terceros, cursos en línea o presenciales, mismos que se darán a conocer por los medios oficiales de comunicación de la Empresa con el fin de capacitarlos para que puedan comprender los conceptos, alcances, situaciones y platicar inquietudes que pueden suceder en el día a día de nuestras labores. Es nuestra responsabilidad atender las sesiones asignadas, cumplir con los tiempos y con las evaluaciones solicitadas.

Además, ponemos a disposición la siguiente dirección de correo electrónico para recibir preguntas e inquietudes con respecto a estos lineamientos que puedan surgir diariamente: contacto-rse@americamovil.com.



6. Sanctions

Non-compliance with this Stakeholder Guidelines of the Anticorruption 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.

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

7. Whistleblower Portal

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

Likewise, we must 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.

The Compliance Officer of América Móvil, who in turn reports to América Móvil's Audit and Corporate Practices Committee, will oversee all complaints. The Compliance Officer 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.