

# Code of Ethics for Suppliers

## América Móvil

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### Message from our CEO:

At América Móvil, our work is based on our principles and values, and we conduct our operations and activities ethically and with integrity. Accordingly, this Code of Ethics defines guidelines and criteria applicable to our business relationships with Suppliers; it has been designed with guidelines for our global value chain as a whole so that every action can be assessed to determine if it is correct or not for our commercial relationships.

For América Móvil, “Suppliers” means distributors, representatives, advisors, business partners, agents, intermediaries, contractors, managers, lobbyists or consultants that are part of América Móvil's global value chain, or who act on behalf of or represent the Company in any interaction with another third party, a government or civil servants.

We expect our Suppliers and their partners, like us, to ensure their day-to-day activities are ethical and sustainable, in compliance with the law, with all our internal policies and any other applicable internal or external standard.

We must comply with the principles and values of América Móvil, and ensure that any Suppliers with whom we hold a business relationship comply with the guidelines contained in this Code; in addition, we shall immediately report, through the whistleblower channels made available, any event or action contrary to such principles and values.

Understanding and adopting América Móvil's principles and values shows that we are committed to the future of the Company, as well as the future of our society and our families. I would like to invite you to read it carefully and keep it as a reference for your day-to-day activities.

Adopt this Code as a tool for your daily work activities, respect it, disseminate it and make sure that those around you do the same.

On behalf of América Móvil and our leaders, I want to thank you for your work and your trust.

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## América Móvil

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## América Móvil

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### 1. Our Company

América Móvil and its subsidiaries (hereinafter referred to as “América Móvil”, the “Company” or the “Enterprise”), form a Company consistent with its values and principles. As a result of these principles and values, millions of telecommunications users prefer us in the countries where we operate.

The transformation of our Company has seen us grow from a local provider of voice services to our current position as a provider of telecommunication and information technology services, including fixed and mobile telephony, high-speed broadband, cable TV services, data and content transmission, among others, as well as a wide range of innovative connectivity solutions to improve the life of our users.

Today, we are the leading communications Company in Latin America and one of the most important companies worldwide.

### 2. Our Mission and Vision

#### 2.1. Mission

We provide the best service experience, offering cutting-edge telecommunications, information technology and digital content solutions, contributing to the fast-paced development of all countries where we operate, and promoting equal opportunities for all.

#### 2.2. Vision

Consolidate our role as a change agent by delivering connectivity and high-tech services; continue to be a leader in the telecommunications industry, with a renewed commitment to building a world where every person can thrive.

### 3. Our Strategy

We invest in our networks and in state-of-the-art technology, to increase our capacity and coverage and to offer to our customers innovative solutions and top-quality services. Thus, we strive to be more efficient, with environment-friendly solutions that improve our users' experience.

### 4. Values and Principles

Our entrepreneurial ethics values and principles are the traits that distinguish and orient us. We practice them on a daily basis, because they are a fundamental axis of our culture of excellence, productivity and leadership. The pillars of our corporate culture are:



- **Customer Experience:** We strive to build strong relationships with our customers, who are at the heart of our business, by focusing on, listening to and understanding their needs, in order to provide solutions that may lead to full customer satisfaction and a top-notch service experience.
- **Innovation:** We promote an atmosphere where people are challenged and completely open to change, fostering dialog and the collective construction of new ideas and solutions that may help us become the best option, taking risks consciously and seeing mistakes as an opportunity to learn.
- **People / Human Development:** We foster people's development to their full potential and honor their dignity within a learning environment where respect, collaboration, good performance, diversity, equality and inclusion are crucial. We promote people's growth through challenges, training and advice, to empower them in their decision-making process.
- **Sustainability:** We are committed to being a change agent fostering inclusion, economic development and well-being in the region, always seeking to find a balance between the economic, social and environmental aspects of our operations. Accordingly, we strive to improve in every aspect for the benefit of our coworkers, customers, Suppliers, shareholders and other stakeholders.
- **Integrity:** We fully comply with all laws, rules, regulations and ethical principles governing our activities. We are convinced that transparency and honesty create security and trust, and we also value the fact that our words match our actions.
- **Efficiency:** We maintain an austere program in times of prosperity to ensure we remain strong in times of crisis. We also take care of the Company's property as our own. We optimize our processes by keeping an eye on our costs and expenses, meeting the highest quality standards in the industry.
- **Collaboration:** We foster participation to ensure that every person can actively contribute to the achievement of our goals, sharing insights, listening to and considering the ideas of everyone else. We bring together our talents, experiences and skills to achieve the best results.

### 5. Why do we have a Code of Ethics for Suppliers?

Our Code of Ethics for Suppliers, along with applicable laws, agreements and good international practices, is one of the pillars of the Integrity and Compliance Program at América Móvil and its subsidiaries. It represents the values of our Company, so it is to be applied in general by all our Suppliers and their employees across our global value chain.

This Code of Ethics defines the expected behavior in our interactions with third parties, as well as among Suppliers and employees of América Móvil. Furthermore, the Code of Ethics



describes the standard behavior we should have with the Company, with customers, and with the society in general.

We know that it is impossible to anticipate all the situations that may come about during our daily tasks, so this Code of Ethics works as a guide to make the best ethical decisions in our work, and to know who can answer any questions we may have.

### **6. What is expected of me as a Supplier?**

It is very important for us that our Suppliers know, accept and make their own the principles and values contained in this Code, and that they are put into practice in their day-to-day activities.

This Code establishes your responsibility as a Supplier of América Móvil to comply with applicable laws, act with integrity and honesty in all aspects, and be responsible for your actions.

We expect all our Suppliers to observe and have their employees, and the rest of their value chain observe, our Integrity and Compliance Program. You can read the full version of our Integrity and Compliance Program in the portal of América Móvil.

Our success, and the opportunities for our Company to transcend, depend largely on our compliance with the guidelines contained herein.

You are an important member of this entrepreneurial community and your support is essential if we are to achieve the objectives that we have set.

You must understand this Code and comply with it. Thus, we ask you to do the following:

- Read the Code carefully. Understand its scope and what is expected of you.
- Share the contents of this Code with your partners and the rest of your value chain.
- Comply with the principles contained in this Code in all your activities. Make them yours, they are the basis for our philosophy and entrepreneurial culture.
- Always behave ethically; be proud of your attitudes and actions. You must comply with all the principles and behaviors indicated herein.
- If you become aware of, discover or suspect that an employee of América Móvil, Supplier, contractor or third party related to the Company, behaves in an illegal or non-ethical way or in breach of the principles established in this Code, please visit our portal to submit a complaint at: <https://denuncias.americamovil.com>

Remember that we all have an obligation to protect the Company and its subsidiaries from any illegal or unethical behaviors that may endanger us.



In this sense, failing to timely report any activities that are contrary to the law or to this Code may lead to patrimonial or criminal damages to the Company, and you may even unintentionally become an accessory by covering up illegal or unethical activities.

If you think it is necessary, you may file anonymous complaints. We assure you that at América Móvil and its subsidiaries, we have adopted reasonable and justified measures to protect the confidentiality of every complaint and the respective complainant. We guarantee at all times that no retaliation will be taken against you for having filed a complaint.

For further information on the submission of complaints, we suggest you read the section: Our Duty to File Complaints at the end of this document.

Thank you very much for your cooperation, and for making yours these basic principles of professionalism and responsibility. We are sure that this Code will help us all to grow, both personally and professionally.

### **7. Who is responsible for the oversight of compliance with the Code of Ethics for Suppliers?**

The Compliance Officer of América Móvil is responsible for establishing the Integrity and Compliance Program, which includes proper and efficient policies and systems of control, surveillance and auditing, to constantly and periodically assess compliance with this Code of Ethics for Suppliers, as well as any laws, regulations and policies setting integrity standards across the organization.

The Audit and Corporate Practices Committee of the Board of Directors of América Móvil, through the Compliance Officer, is responsible for supervising, overseeing and, as applicable, auditing the due compliance of all provisions in this Code of Ethics for Suppliers, and periodically evaluating its effectiveness. This, through periodic meetings in which the Compliance Officer will present a report to obtain feedback from the Audit and Corporate Practices Committee of the Board of Directors of América Móvil.

If you have any questions, you may write to the Compliance Officer of América Móvil at the following e-mail address [yocumplo@americamovil.com](mailto:yocumplo@americamovil.com)

#### **7.1. América Móvil's Ethics Committee**

This is a regulating body comprised of an interdisciplinary group of top management members from the headquarters offices of América Móvil.

The Ethics Committee is responsible for overseeing the handling of all complaints received through the Whistleblower Portal of América Móvil and any breach of our Code of Ethics for Suppliers identified in Company operations, as well as for establishing disciplinary sanctions for unethical conducts of our employees or third parties.



### **7.2. Ethics Committee of Subsidiaries**

Every subsidiary has an Ethics Committee entrusted with the handling of local complaints, which reports to the Ethics Committee of América Móvil in accordance with the Protocol for the Operation of Ethics and Report Management Committees of América Móvil.

### **7.3. Transparency and Communication of Interests**

América Móvil, through its Integrity and Compliance Program, releases and implements mechanisms to ensure transparency in its operations, such as the Whistleblower Portal and the Conflict of Interest Policy, among others.

## **8. Respect for Human Rights and No Discrimination**

América Móvil's Suppliers must treat every person with respect and dignity, pledging to protect and respect Human Rights in general, and specifically, to observe the United Nations Guiding Principles on Business and Human Rights published by the Office of the High Commissioner for Human Rights, and if applicable, remedy or repair any human rights abuses.

We operate in a globalized world, with different cultures and traditions. We are convinced that these differences enrich us, and we fully respect that diversity. Furthermore, we are convinced that the differences in the way we think, our beliefs or preferences, allow us to develop a wider perspective and be more creative in our problem-solving.

We promote diversity and inclusion, and therefore, América Móvil's Suppliers must:

- Treat every person with dignity and professionalism and be firmly against labor exploitation.
- Not tolerate any kind of discrimination and promote a culture of healthy interaction in the workplace, based on respect, teamwork and solidarity.
- Promote respect and inclusion in the workplace, without discriminating against anyone based on their disabilities, ethnicity, religion, gender, marital status, nationality, sexual orientation, economic capacity, age or political opinion, or for being pregnant, among others.
- Not allow any kind of harassment, intimidation, derision, threats, ridicule or other attitudes involving physical or psychological violence that insult the dignity of our employees, cause them discomfort or make them feel harassed in any way.
- Forbid the display in the workplace, by any means, of images or objects of a sexual nature or which in any way promote hate, discrimination or stereotyping.
- Promote equal opportunities for men and women, and refrain from allowing any type of gender violence or sexual or labor harassment.

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- Take a stand against child exploitation and adopt measures to prevent it, including verifying compliance with minimum age requirements established in applicable national laws.

We define child exploitation as any activity carried out by boys, girls or teenagers, paid or not, in breach of legal provisions, in hazardous or unhealthy conditions, or likely to have negative effects, immediately or in the future, on the child's physical, mental, psychological or social development, or which may interfere with the child's education.

If a minor is hired, Suppliers must ensure their rights and guarantees are respected across the board, working closely with their parents, tutors or other persons responsible for their guardianship and custody.

- Strictly forbid their respective employees from carrying out actions contrary to the law and/or that may constitute a crime, including but not limited to: personal data breach, cybercrime, human trafficking, child pornography, among others; especially when using América Móvil's assets.
- Not interfere with their employees' free association and collective bargaining rights.
- Make their best efforts to ensure that the principles they accept under this Code are known across their value chain, and pledge to take steps to ensure their suppliers, distributors and other commercial partners agree to conduct themselves in accordance with the guidelines specified in this Code in their relationships with their employees, including the protection of Human Rights.
- Implement dissemination campaigns to promote awareness of the importance of protecting Human Rights, labor inclusion, diversity and gender equality.

These are the basic principles of our Human Rights policy. If you identify improper behaviors, inconsistent with these principles, file a complaint in our portal at <https://denuncias.americamovil.com>

Please read the full version of our Human Rights Policy with just one click:



América Móvil Portal



Compliance Portal





### 9. Workplace Security

Security is one of our priorities. All our Suppliers and their employees must respect the Company's personal safety and security standards, since the integrity and security of our employees or third parties may be at risk.

In this sense, América Móvil's Suppliers must comply with the highest workplace safety and security standards applicable. One of our goals is to have the lowest possible number of work-related incidents.

Thus, at América Móvil's Suppliers will pledge to:

- Offer a safe work environment, with such training, equipment and tools as necessary for health and safety protection, and to take all necessary steps to prevent or minimize workplace risks in their operations.
- Promote a healthy and safe environment for their employees.
- Ban carrying any kind of weapon in the workplace, in corporate vehicles, or when representing América Móvil, except for specific circumstances authorized for our security personnel, if applicable, to protect the employees and the goods of the Company.
- Comply with all civil security standards and provide training to employees on the measures to take in case of contingencies.

Each Supplier of América Móvil will be responsible for protecting their employees to prevent risks in the workplace. If you notice any situation that poses a risk to our security or constitutes a breach of the standards of occupational safety, please file a complaint at <https://denuncias.americamovil.com>

Please read the full version of our Occupational Safety and Health Policy with just one click:



América Móvil Portal



Compliance Portal

### 10. How to Treat Customers

We owe our existence to our customers. In order to keep customers' loyalty and achieve our mission, it is essential to treat them with the utmost respect, attention and kindness. This involves, among other things:

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- Treating them fairly, always respecting Human Rights. Treating every person coming into our premises, whether commercial or administrative, without discrimination for any reason, such as gender, age, social condition, disability, sexual preference, religion or political affiliation.
- Offering services and products that efficiently and timely meet their needs; and being transparent regarding the terms and conditions of our contracts and services.
- Providing appropriate, clear, reliable and timely information about the products and services that we offer, and those that each of them has purchased.
- Answering their questions and solving general, administrative and technical problems with highly trained and customer-oriented personnel.
- Offering our customers the best possible quality, according to our processes and operational standards.

This series of factors that have a huge impact on the preference of our customers can be translated into one single word: Quality.

Our success depends on our ability to develop and offer innovative and high-quality telecommunications products and services. Our customers are the judges of that; that is why we should never deceive them, provide false information or set any conditions for a sale.

The rights of our customers are protected in the countries where we operate by consumer protection laws, which seek equality and legal security in the relationships between customers and suppliers.

Failures to meet our standards of customer service and attention or any undue commercial practices may, among other aspects, harm our reputation, lead to the intervention of the authorities, and cause us damages.

América Móvil does not tolerate any deviation from our standards of conduct and customer service.

If you notice any situation that represents a breach to our standards in dealing with customers, file a complaint at <https://denuncias.americamovil.com>

## 11. Personal Data

América Móvil's Suppliers must safeguard and protect the personal data of our customers with the same care as their own. This information must be used solely for the purposes specified for collection.

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In order to keep the integrity and confidentiality of personal data, América Móvil's Suppliers must have cutting-edge storage and data processing systems, as well as several security processes, controls, and technical, physical and administrative measures.

Access to personal data must be limited to those employees and Suppliers who need to know it to perform their duties.

We have pledged to protect and keep safe the personal data that both our customers and other stakeholders have entrusted us, complying with the laws, rules and regulations of the countries where we operate, and internal training on the following principles:

- **Integrity:** We keep the personal data that we receive protected against any alteration, loss, theft, hacking, intervention or destruction, either accidentally or fraudulently.
- **Availability:** We have procedures to ensure that the information of our users is available for them at all moments.
- **Confidentiality:** Personal Data is only used by authorized personnel and/or Suppliers with a valid reason to do it.

We abide by currently valid laws on the privacy of personal data and telecommunications in the countries where we operate and provide services.

If you have any question with regard to the management of our customers' personal data and/or the application of these guidelines, contact your line manager, and if you still cannot understand how to process personal information, contact [privacidad@americamovil.com](mailto:privacidad@americamovil.com) for any questions and assistance.

If you identify any default of our Privacy Policy, file a complaint at our portal <https://denuncias.americamovil.com>

Read the full version of our Privacy and Personal Data Protection Policy with just one click:



América Móvil Portal



Compliance Portal

## 12. Confidential Information

América Móvil's Suppliers pledge to refrain from disclosing Confidential Information.

In general, for purposes of our Company, Confidential Information means all the data we develop, generate and operate containing sensitive information that gives our Company a competitive edge.



In addition, Confidential Information shall mean, among other things:

- Financial and legal information;
- Information about our products and services, including our current and future plans;
- Market Information developed internally by the Company;
- Information obtained through our telecommunication networks;
- Business information in general, including information related to our plans, programs and current and future expectations.

If you have any Confidential Information, it is important that you at least adopt the following safeguarding measures:

- Store it in a safe place;
- Do not leave photocopies or printouts of Confidential Information in common areas;
- Do not talk about such information with colleagues who do not need to know it;
- Do not leave your computer screen with Confidential Information open;
- Never talk about this information with relatives or friends;
- Do not talk about confidential information when making calls or having conversations in public places;
- Do not share Confidential Information or discuss it with people (either internal or external to the Company) if you are not sure they have formal authorization to know it.

Disclosing Confidential Information could provide undue business advantages to third parties, cause damages to América Móvil, and place at risk the privacy of communications from our customers and commercial partners and could even lead to specific liabilities for you.

Accordingly, all Suppliers and their partners must abide by the following rules:

- Access to internal information is limited on a need-to-know basis. We should refrain from discussing any Confidential Information, even with our colleagues, unless they require it to perform their duties and prior authorization from our line manager.
- Disclosing Confidential Information to third persons is forbidden. In justified cases, you may provide Confidential Information to third parties prior authorization from a person or area appointed for such purpose by the Company, subject, in all cases,

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to the execution of confidentiality agreements or other protection measures, as well as those specified in applicable laws, rules or regulations.

- If a government authority requests any information or orders its disclosure, notice thereof must be given to the Legal Department of América Móvil, so that they can take all steps necessary to protect the respective information and make sure that all applicable requirements are met.
- If, as a result of our work, we receive Confidential Information from another person, including any competitor, customer, supplier or government authority, not addressed to the Company, we must respect and protect such confidentiality in accordance with the above-mentioned criteria, and whenever possible, return such information to the sender without reading the contents.
- All Suppliers and their partners must refrain from having confidential conversations of any kind in public places, as well as from unduly disclosing Confidential Information through the media, including Internet, social media or mobile phones, always abiding by applicable provisions.
- Sharing Confidential or privileged information to obtain, directly or indirectly, a profit or personal benefit, is strictly forbidden. Be careful when sending email messages, making sure you are transmitting information only to people authorized to receive it.
- When the work relationship of any Supplier with América Móvil comes to an end due to any cause, the respective Supplier must return to the Company all the Confidential Information entrusted to them. Likewise, the Supplier must ensure that, upon termination of its labor relationship with any employee, the corresponding employee returns all the documents and/or tools provided to perform their duties which contain Confidential Information of América Móvil.

The obligation of confidentiality with respect to Company information will continue after the termination of any contracts with employees or Suppliers.

If you notice or suspect there has been a breach of Confidential Information, visit our portal <https://denuncias.americamovil.com> to file a complaint.

Read the full version of our Privacy and Personal Data Protection Policy with just one click:



América Móvil Portal



Compliance Portal



### 13. Effective Corruption Control

América Móvil's Suppliers must be firmly committed to fighting corruption and determined to comply with the provisions of the Mexican National Anti-Corruption System; the General Administrative Liabilities Law; the Foreign Corrupt Practices Act or "FCPA" (the American anti-corruption law); local and international anti-corruption laws, and international treaties on the subject.

Accordingly, América Móvil's Suppliers must have in place policies and protocols to fight and prevent corruption.

Any violation of this Code of Ethics, internal policies, or applicable anti-corruption laws, rules and regulations, irrespective of the country where it takes place, may give rise to civil and criminal penalties, ranging from fines to imprisonment, being imposed on individuals and the Company.

In the public sector, corruption means the abuse of power for personal gain or for the benefit of the Company. In the event of interactions with civil servants or government entities, this is known as Public Corruption. In the private sector, i.e. in the event of actions or failures to act with the purpose of getting some kind of undue benefit for the Company, personal gains or advantages to a third party, this is known as Private Corruption.

América Móvil's Suppliers must ban their employees from directly or indirectly giving or receiving, offering or requesting bribes, or aiding or authorizing the payment or reception of a bribe. Bribes may include payments to have an undue advantage or influence a decision (like getting a tax rate lower than the one provided by law.)

For purposes hereof, Bribes will include payments in cash, securities, personal or real property, donations, jobs, gifts, access to entertainment and hospitality, travels, loans, payments of fees, vacations, job offers, personal services or any other thing of value.

#### 13.1. Gifts, Entertainment Expenses and Hospitality

As provided in América Móvil's policies, giving or receiving gifts from third parties, including Suppliers, is forbidden, so this conduct must be avoided; in terms of giving or receiving meals or access to entertainment or hospitality, this may be acceptable as long as there is no expectation that the person who received the benefit will give back something in exchange for that courtesy, and it is not contrary to specific legal entrepreneurial purposes.

Any courtesy of the type described above must be reported in advance and authorized by América Móvil's Compliance Officer, and must be reasonable in accordance with the circumstances, not excessive nor frequent.

Giving or receiving gifts, access to entertainment or hospitality to or from civil servants, either directly or through intermediaries such as distributors, suppliers, consultants, third parties or travel agents, is forbidden.

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It is worth mentioning that gifts, meals or other type of payments from or to civil servants involve a higher risk, and they may be forbidden or limited by local laws. For purposes of this Code of Ethics for Suppliers, all employees of government companies shall be deemed civil servants.

For further information about gifts and access to entertainment and hospitality, read the Gifts, Entertainment and Hospitality Policy with just one click:



América Móvil Portal



Compliance Portal

If in doubt as to whether to accept or give a gift, meal, access to entertainment and hospitality, and specifically if it is for a civil servant, you must ask the Compliance Officer. Write to [yocumplo@americamovil.com](mailto:yocumplo@americamovil.com)

Further, if you notice or suspect any breach to the Gifts, Entertainment and Hospitality Policy of América Móvil, file a complaint in our portal <https://denuncias.americamovil.com>

## 13.2. Interaction with Civil Servants

Due to the nature of our business, it is sometimes necessary to interact with civil servants. Transactions with the government are governed by specific laws and differ from doing business with individuals.

América Móvil's Suppliers shall not offer anything to a civil servant, either directly or indirectly, in exchange for receiving favorable treatment.

Any licenses, permits or paperwork before Government agencies for the operation of the Company must be obtained or submitted in accordance with the Anti-corruption Policy of América Móvil.

América Móvil's Suppliers shall refrain from participating directly or indirectly in any bid or tender in which there are signs of corruption, timely and transparently fulfilling information requests and observations made by the authorities.

América Móvil's Suppliers shall also refrain, in their own capacity and when acting on behalf of América Móvil, from:

- Executing agreements with distributors, representatives, advisors, commercial partners, agents, intermediaries, customers, contractors, lobbyists, consultants or suppliers which may pose a risk of bribe or corruption. In other words, América Móvil's Suppliers should not negotiate with or make payments to third parties if there is any sign that they may be involved in any bribe or act of corruption.

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- Making payments for gifts, access to entertainment or hospitality to public officials or their relatives.
- Making “facilitation payments”, that is smaller payments or fees to obtain a government service we are entitled to, such as the issuance of a visa.
- Making donations or payments to political parties or causes. Personal donations are permitted in accordance with applicable local laws.

América Móvil’s Suppliers shall also forbid any unethical behavior such as fraud, deception, extortion, collusion, use of false information, embezzlement or money laundering, and terrorism financing, among others. These actions constitute crimes, even if they involve civil servants.

Finally, América Móvil’s Suppliers shall forbid any efforts to facilitate the performance or disguise of acts of corruption, irrespective of the benefit they may derive from them.

In order to fight corruption, América Móvil’s Suppliers must pledge to:

- Abide by the anti-corruption laws of all the countries where they operate or which are applicable to them.
- Comply with all applicable laws and financial reporting standards.
- Complete all negotiations, purchases and financial transactions according to their internal procedures, and keep for the appropriate period the corresponding records, for review in the event an audit is conducted.
- Ensure that all payments they make are solely for goods or services actually provided.
- Adopt internal controls and file complaints as necessary, before the corresponding authorities, if any employee or third party commits an act of corruption.
- Promote practices to effectively control corruption across the value chain, provide training to our personnel on preventive measures, and organize dissemination campaigns.

If a relationship with a civil servant leads to questions regarding the appropriateness of certain actions, please send your questions to América Móvil’s Compliance Officer at [yocumplo@americamovil.com](mailto:yocumplo@americamovil.com)

If you identify or suspect a breach of our Anti-corruption Policy, file a complaint in our portal <https://denuncias.americamovil.com>





Read the full version of our Anti-Corruption Policy with just one click:



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Remember that it is your responsibility to file a complaint if you notice any suspicious activity, or you may be accessory to an act of corruption, and this could have consequences for you.

### 14. Conflicts of Interest

This kind of conflicts come about when the interests of an employee or Supplier of América Móvil are inconsistent or interfere with the interests of the Company.

Conflicts of interest are a form of corruption and consist of an action that may be unduly influenced by some personal, family or third-party interest.

There is a conflict of interest whenever an employee or Supplier makes decisions or takes action based on their own benefit (often economic or personal), in opposition to their duty to act for the benefit of the Company when representing it. A good criterion that may be used to know if you have a conflict of interest or not is to imagine yourself explaining your actions to a friend, colleague or to the press, and asking yourself if you would feel comfortable.

Conflicts of interest may affect our judgment and the reputation and image of América Móvil's Suppliers, and make them vulnerable to possible risks, so we should avoid conflicts of interest, whether real or likely to be interpreted as such, on issues related to hiring decisions, promotions or any other negotiation.

Likewise, we should not accept or offer gifts, favors or access to entertainment or hospitality which may influence our decisions or affect the Company's business relationships.

Many Suppliers have relatives or people close to them who are employees or customers. Family, personal and/or friendship ties shall not play any role in the selection of people to fill job positions or the selection of a Supplier, as this may lead to real or potential preferential treatment or favoritism, and hamper objectivity, so all assignments of this kind within the Company are forbidden. It is important to remember that job-related decisions must be based on qualifications, performance, skills, efficiency and experience.

América Móvil's Suppliers, due to their nature, shall not interfere with the interests or reputation of the Company or negatively affect the Company in matters of competition.

They shall not become employees of or otherwise provide services or receive payments from any customer, Supplier or rival of the Company.

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Any conflict of interest must be reported by the person or persons involved to América Móvil's Compliance Officer using the Declaration of Conflict of Interest format attached to the Conflict of Interest Policy of América Móvil.

If you notice or suspect a breach to our Conflict of interest Policy, file a complaint in our portal <https://denuncias.americamovil.com>

Read the full version of our Conflict of Interest Policy with just one click:



América Móvil Portal



Compliance Portal

## 15. How to treat our Suppliers

As specified in the previous section, any personal relationship between América Móvil's employees and our Suppliers or commercial partners should not create conflicts of interest, hamper their objectivity or give the appearance of any inappropriate behavior; therefore, in such cases, employees and Suppliers must refrain from making decisions that could be influenced by any such relationship.

These risks arise particularly when business relationships are established on behalf of América Móvil with relatives, friends or third parties, or when we receive or give a gift, meal or other payment to or from a Supplier, mainly to or from a government company.

Any conflict of interest must be reported using the "Declaration of Conflict of Interest" format attached to the Conflict of Interest Policy.

América Móvil's Suppliers and employees must have professional relationships to ensure observance of the values and principles established in this Code of Ethics and we must make our best efforts to ensure that our Suppliers promote and follow these principles.

We must select our Suppliers based on the merits, costs and efficiency of their products and services; our needs must be clearly and accurately communicated to current or potential Suppliers; and we must make sure that we receive the right value for the price paid.

All interactions with our Suppliers must be in accordance with the established procedures, which include legal and registration obligations.

For purposes of the selection and hiring of Suppliers and third parties providing goods or services to the Company, we shall follow the guidelines established in the Procurement Policy and the Third Party Due Diligence Protocol.

If you notice or suspect a breach of our Procurement Policy or the Third Party Due Diligence Protocol, file a complaint in our portal <https://denuncias.americamovil.com>

# Code of Ethics for Suppliers

## América Móvil

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Read the full version of our Procurement Policy with just one click:



América Móvil Portal



Compliance Portal

Read the full version of our Third-Party Due Diligence Protocol with just one click:



América Móvil Portal



Compliance Portal

### 16. Third-Party Due Diligence

Any Suppliers who are or are willing to become a link in the value chain of América Móvil must complete the Due Diligence procedure.

The Compliance Officer is responsible for completing Due Diligence procedures for our Suppliers through third parties qualified for such purposes, considering, among other things:

- An assessment of the experience, soundness or financial sustainability of the relevant third parties;
- The identification of final beneficiaries;
- Any existing relationships and contacts between the corresponding entities, individuals and final beneficiaries, and government entities and officials;
- An analysis of the track record of sanctions and litigation of any such third party and associated individuals;
- An analysis of the third party's track record of ethical behavior, through reports in the event of corruption-related crimes, financial crimes or unethical conduct or corporate and ethical malpractice.

In order to engage any third party providing goods or services to América Móvil's Providers, our recommendation is that the same or a similar procedure to that specified in the Third-Party Due Diligence Protocol and the Procurement Policy of América Móvil should be established.

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Read the full version of our Procurement Policy with just one click:



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Read the full version of our Third-Party Due Diligence Protocol with just one click:



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Compliance Portal

### 17. Anti-Money Laundering

América Móvil's Suppliers must abide by the laws that prohibit money laundering or terrorist financing. América Móvil's Suppliers must be aware of and comply with these provisions to prevent any services offered by the Company from being used to conceal or disguise the origin of illegal resources.

In view of the risks to which the Company is exposed, América Móvil's Suppliers must be always alert to any situations that may involve the use of resources of illegal origin.

If you identify or suspect a breach of our Anti-Money Laundering Policy, file a complaint in our portal <https://denuncias.americamovil.com>

Read the full version of our Anti-Money Laundering Policy with just one click:



América Móvil Portal



Compliance Portal

### 18. Economic Competition

At América Móvil, we recognize that markets which are subject to dynamic and efficient processes of free and fair economic competition contribute, on the one hand, to economic development and a healthy economy in the countries where such companies are



established, and on the other hand, strengthen the internal efficiency of all economic agents that follow this model.

Accordingly, we are convinced that we must always compete based on the price and/or merit of our products and services, as well as our ability to offer innovative and efficient distribution channels. Thus, we at América Móvil expect our Suppliers to agree to refrain from any acts of collusion with competitors, and from adopting or being subject to any commercial practice that illegally restricts economic competition in the markets where our Company participates.

At the same time, we understand that some activities of América Móvil and its subsidiaries, due to their nature, are regulated by economic competition laws, rules, ordinances and regulations in each of the countries where we operate. That is why América Móvil expects its Suppliers to accept the responsibility of understanding such legal provisions and pledge to observe them, according to their legal and economic nature.

On the other hand, we are determined to avoid any action by América Móvil's Suppliers that may reasonably appear to be a forbidden conduct, since the violation of any economic competition laws could have serious consequences for the Company.

In this sense, América Móvil's Suppliers shall not discuss any topic with a rival company if such communication can affect or be interpreted as affecting free competition, except where allowed by the law, and in compliance with all legal requirements established for such purpose.

Please contact our Legal department before exchanging information, discussing commercial topics, negotiating or entering agreements with a rival company.

Read the full version of our Economic Competition Policy in our América Móvil portal, and find tools made available by the International Chamber of Commerce, or "ICC," to comply with economic competition standards<sup>1</sup>; the "Guía para el Intercambio de Información entre Agentes Económicos" [Guide for the Exchange of Information between Economic Agents] and "Recomendaciones para Diseñar e Implementar un Programa de Cumplimiento Efectivo" [Recommendations to Design and Implement an Effective Compliance Program] for matters of economic competition, both issued by the Federal Economic Competition Commission<sup>2</sup>.

If you notice or suspect a breach to our principles of Competition, go to our portal <https://denuncias.americamovil.com> and file a complaint.

## 19. Sustainability

Sustainability, for América Móvil, means ensuring a balance between the economic, social and environmental spheres, in such a way that the Company and its Suppliers can have a continued positive impact on the communities where they operate and their environment,

<sup>1</sup> © International Chamber of Commerce (ICC), 2015.

<sup>2</sup> DR Comisión Federal de Competencia Económica (Federal Economic Competition Commission), 2015.

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thus reinforcing our commitment to be a change agent promoting inclusion, economic growth and well-being.

In this sense, with our Intelligent Sustainability Strategy we seek to turn the Company and its subsidiaries into catalyzing agents for people's development and quality-of-life improvement, through digital connectivity, road awareness, environment preservation and care actions, among others.

Furthermore, América Móvil's Suppliers should strive to keep their operations in line with the best national and international standards, including the Ten Principles of the UN Global Compact, the Women's Empowerment Principles, and the Sustainable Development Goals established by the United Nations.

Every action that may endanger the sustainability of América Móvil must be reported to <https://denuncias.americamovil.com>

For further information about the different sustainability initiatives, read our annual report at <https://sustainability.americamovil.com/reports/> or contact us at [contacto-rse@americamovil.com](mailto:contacto-rse@americamovil.com)

## 20. It is Everyone's Responsibility

Our Code of Ethics for Suppliers confirms the commitment of América Móvil to attain the highest standards in labor conduct and business practices. However, each person remains ultimately responsible for his/her own actions.

No Code of Ethics can cover provisions for all possible situations or include all the standards applicable to each concrete case. Thus, the contents of this Code of Ethics for Suppliers must be considered together with applicable laws, rules, regulations, policies, guidelines, practices, instructions and procedures, both of América Móvil and those applied locally in each of our countries.

As members of a global company, América Móvil's Suppliers must comply with the laws of all the countries in which they operate. Therefore, within their responsibilities, they all have an obligation to be aware of and comply with such applicable laws, rules and regulations.

América Móvil's Suppliers should also act in support of the spirit and intention of every law they are subject to. In this sense, in any event of discrepancies between this Code of Ethics and any other guideline of América Móvil and local laws or regulations, Suppliers will always apply the highest standard of conduct.

If you think that a provision contained herein is in conflict with any local law or provision, or if you have a question regarding the application of our Code of Ethics for Suppliers, write to [yocumplo@americamovil.com](mailto:yocumplo@americamovil.com)



### **21. Breach of Our Code of Ethics for Suppliers**

Any breach of the Code of Ethics for Suppliers affects the image and reputation of América Móvil and all those who work at our Company.

Any breach of this Code of Ethics or the internal guidelines of América Móvil may lead to disciplinary measures, or even to administrative, civil or criminal sanctions, being imposed based on the severity of the breach.

### **22. Our duty to file complaints**

All of us must report, directly through the Whistleblower Portal, any conduct in breach of this Code of Ethics or any applicable law, regulation, policy or internal procedure, and in general, any unethical conduct.

We should cooperate with any internal or external investigation and keep it confidential. Any Suppliers or employees filing false or intentionally misleading complaints may be subject to disciplinary sanctions.

Remember that failing to report an ethical violation may have disciplinary consequences for you, since you may be covering up an unethical behavior or offense. Complaints can be made anonymously if complainants choose to do so. In this case, we recommended that some contact information should be provided for follow-up purposes during the investigation.

América Móvil will take all reasonable and justified measures to protect complainants, so that no retaliation is taken against them for their complaint. The Company will make its best efforts to protect the confidentiality of all complainants.

No provision of this Code of Ethics shall be deemed to prevent any person who feels affected by or has witnessed an illegal conduct from filing the corresponding complaint directly with the appropriate authorities. In such cases, our suggestion is that it should be reported to Legal and/or América Móvil's Compliance Officer, so that they can cooperate with the authorities, if necessary.

Any and all complaints received through the Whistleblower Portal of América Móvil will be managed, handled and investigated by América Móvil's Compliance Officer, who will, in turn, report to a multidisciplinary group of officials of América Móvil that conform the Ethics Committee.

For any complaint, the Whistleblower Portal is available at <https://denuncias.americamovil.com>

### **23. Help us to improve this Code**

This Code of Ethics establishes the minimum standards that América Móvil's Suppliers will adhere to.

# Code of Ethics for Suppliers

## América Móvil



We are aware that it is not possible to prevent or regulate all the possible situations, so we thank you in advance for any suggestion or comment that may help supplement and improve this Code sent to the email address [yocumplo@americamovil.com](mailto:yocumplo@americamovil.com)

We at América Móvil know that your role in connection with the compliance of our Code of Ethics is vital for the development and success of our Company. Thank you for reading thoroughly and taking the time to understand these provisions, and we hope you put them into practice in your daily work.