



ANTI-CORRUPTION POLICY CLARO COLOMBIA		
Belongs to the process: Business Risk Management and Revenue Assurance.	Date: Dec-4-2023	
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Objective

To establish the Companies' commitment against corruption and ensure that its employees, suppliers, distributors, contractors, allies and other counterparties understand and reflect their individual responsibility for compliance.

Definitions and abbreviations

Conflict of interest: Situations in which the judgment of an employee or third party is unduly influenced by primary or secondary interests, which are often financial or personal. Conflicts of interest arise mainly when the interests of the Company come into play with the personal interests of its employees and, frequently, the interests of third parties.

Corruption: Any abuse of entrusted power for personal gain. Acts of corruption generally materialize through bribery, which consists of the action of offering, promising, giving, accepting, requesting or authorizing any benefit to induce any third party to engage in illegal conduct, misconduct or abuse of trust. Bribes may take the form of gifts, loans, commission payments or rewards in cash or in kind, vacations or special personal services, provided with the intent to obtain an undue advantage or to put moral pressure on someone to grant such advantage.

Government Official: Persons holding a legislative, administrative or judicial office in a State, its political subdivisions or local authorities, or a foreign jurisdiction, regardless of whether the individual was appointed or elected.

Any person exercising a public function for the State, its political subdivisions or local authorities, or a foreign jurisdiction, whether within a public agency, or a State enterprise or entity, whose decision-making power is subject to the will of the State, its political subdivisions or local authorities, or a foreign jurisdiction.


Hospitality: Kindness, courtesy, or form of social amenity, entertainment, travel or lodging, or invitation offered and intended to accommodate third parties.

Intermediary: It is considered consultants, agents, advisors, external lawyers, representatives, lobbyists or other types of intermediaries who, both in the public and private sector, perform any operation on behalf of or in the name of Claro Colombia, in relation to their interaction with public officials, government entities, customers, suppliers and third parties.

Law 1778 of 2016 or Colombian Anti-Corruption Law: whereby rules are issued on the liability of legal persons for acts of transnational corruption and other provisions are issued in the fight against corruption. This law grants powers to the Superintendence of Corporations to investigate and sanction legal persons, their employees, contractors, administrators or associates (their own or of any subordinate legal person), who give, offer or promise to a public

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servant, sums of money, any object of pecuniary value or other benefit or utility in exchange for the latter performing, omitting or delaying acts related to the exercise of his functions and in connection with a business or transaction.

Foreign Corrupt Practices Act ("FCPA"): Law issued in the United States in 1977, which prohibits U.S. companies, companies that issue or trade their shares in this country or any of their subsidiaries, regardless of where their operations are located and their employees, from directly or indirectly facilitating acts of corruption, bribery or extortion of domestic or foreign public officials in order to benefit from this action.

Gift: Payment, gratuity, present, advantage (pecuniary or not), offered or received.

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1. POLICY STATEMENT

This policy applies to: Comunicación Celular S.A. Comcel S.A., Infraestructura Celular Colombiana S.A E.S.P. Infracel S.A. E.S.P, Amov Colombia S.A., Operadora de Pagos Móviles de Colombia S.A.S. Ideas Musicales de Colombia S.A.S. and HITSS Colombia S.A.S. (hereinafter "Claro Colombia" or "the Companies"), which are committed to conducting their business fairly, honorably, with integrity and in compliance with laws and regulations, including all applicable anti-corruption laws.


The purpose of this policy is to establish the Companies' commitment to anti-corruption and to ensure that their employees, suppliers, distributors, contractors, partners and other counterparties understand and reflect their individual responsibility for compliance.

The following are the basic principles of Claro Colombia's anti-corruption policy:

- Claro Colombia and any person within Claro Colombia who is empowered to act on its behalf may not themselves or through an intermediary person give, promise, offer, pay, authorize or offer to a national or foreign public servant, for the benefit of the latter or a third party, directly or indirectly, sums of money, any object of pecuniary value or other benefit or utility in exchange for the latter performing, omitting or delaying any act related to the exercise of their functions and in connection with a national and international business or transaction.
- Any director or employee of Claro Colombia must refrain from requesting, accepting or offering a gift or any unjustified benefit, to the detriment of the Companies or a third party related to them.
- It is prohibited to give any type of donation or contribution, whether in cash or in kind, to any political party or candidate for elected office. Donations to charitable or altruistic institutions must be authorized by the General Management of AMX.
- It is forbidden to accept gifts, gratuities, invitations to events, attentions that may generate a commitment, influence decisions or affect the commercial relations of Claro Colombia.
- In certain business relationships, the acceptance of meals and other types of hospitality that are considered normal and are deemed not to influence a person's decisions are acceptable. Such courtesies must be reported to and authorized in advance by the President, have an appropriate value, be limited to the minimum and be justified. They must correspond to the amounts authorized in the authorization levels manual and be in accordance with América Móvil's policies.

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- Merchandising items may be given as gifts to public or private employees.
- If there is any doubt about whether or not to accept a meal or gift, the Compliance Officer or the Legal and Corporate Affairs Directorate should be consulted by telephone, e-mail or in person.
- Similarly, all gifts, travel or lodging expenses, entertainment and/or food expenses for any public or private employee, which are not prohibited by law, must correspond to the amounts authorized in the authorization levels manual and in accordance with the policies of América Móvil.
- In any case, all employees of Claro Colombia are absolutely forbidden to offer or receive directly or indirectly, through a third party or another person, presents or any kind of gift to or from a public or private servant.
- It is forbidden to accept any trip paid by a supplier or external entity to events, conferences or symposiums, except by express authorization of the Presidency.
- Claro Colombia maintains detailed, accurate, reliable and supported accounting books and records as well as internal controls that allow it to identify some process deviations. Claro Colombia prohibits falsification or manipulation of its books and records.
- All Claro Colombia employees are required to conduct all negotiations, purchases and financial transactions in accordance with internal procedures and to keep all records of such transactions for audit review.
- Ignorance of this policy does not preclude all company employees from complying with it.
- Employees who fail to comply with this policy will be subject to severe disciplinary action as defined by the Ethics Committee.
- Compliance with this policy is especially important because all Directors and employees are potentially criminally liable for violating the U.S. Foreign Corrupt Practices Act ("FCPA"), the Colombian Anti-Transnational Bribery Law 1778 of 2016 and the Colombian Anti-Corruption Statute Law 1474 of 2011.
- Criminal penalties could result in fines for individuals of up to US\$5 million and up to 20 years imprisonment for each violation under FCPA, 650 up to 50,000 Current Legal Monthly Minimum Wages and 9 up to 15 years imprisonment under Law 1778 and Law 1474.

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- The Company could face numerous penalties, including criminal indictments and fines of US\$25 million or more, disgorgement of any illegal profits, prohibition from doing business with the U.S. government and the appointment of a compliance monitor to oversee its business operations under FCPA and fines of up to 200,000 Current Legal Monthly Minimum Wages, inability to contract with the Colombian State for a term of up to 20 years, publication in high circulation media and the obligation to include in the Company's web page an extract of the sanctioning administrative decision and the prohibition to receive any incentive or grant from the Government for a term of 5 years under Law 1778.
- Claro Colombia's commitment against bribery and corrupt payments is led by the Boards of Directors and Corporate Directorates of Claro Colombia and is evidenced through its Ethics and Compliance Program (hereinafter the "Program"), which is designed to assess corruption risks, implement adequate procedures, policies and controls to mitigate those risks, perform appropriate due diligence on suppliers and counterparties, educate employees and other counterparties, carry out monitoring processes to prevent non-compliance and ensure compliance with the Program.
- For the purposes of this policy, acts of corruption include unethical conduct such as bribery, collusion, facilitation payments, fraud, extortion, illicit enrichment, influence peddling, use of false information and money laundering, among others; not only if they involve a public servant, but also if they are committed by an employee, supplier, customer or contractor to the detriment of the Companies.
- Likewise, "occupational fraud", understood as the intentional use of the job position for personal enrichment through the improper use of resources or assets of the Companies, is considered an unethical conduct.
- Claro Colombia recommends as a good criterion to know if it is acceptable to receive or provide a gift, attention, payment or any entertainment expense, to ask yourself how it would look in the eyes of an external person of the Companies, on the front page of a newspaper or how you would explain it to your family.
- When employees and other third parties act on behalf of Claro Colombia, the interest of the Companies must always be placed above personal interest. In this context, employees should always keep in mind that their first professional obligation is to Claro Colombia.
- All reported exceptions will be analyzed by the Compliance Officer who will follow up and decide if any additional investigation is necessary.

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2 OPERATING GUIDE

2.1 Identification of governmental and other high-risk relationships

It is the responsibility of all of the Companies' Directorates to identify and monitor their highest risk relationships, including relationships with government-owned entities, regulators, business partners, intermediaries, agents, consultants, other representatives and commercial accounts important to the Companies.

Companies should exercise special care in these types of relationships, particularly in the terms of contracting and providing/receiving gifts, entertainment or other business courtesies.

2.2 Hiring of intermediaries, agents, consultants and other representatives who interact with government entities and high-risk operations

It is important to mention that bribes are often paid through intermediaries and that bribery schemes are often initiated by intermediaries who may have their own incentives to pay bribes.

Therefore, the Companies must exercise controls to hire intermediaries, agents, consultants and other representatives who assist the Companies with the handling of high-risk relationships such as dealings with governmental entities, import and export processes, representation before important commercial accounts, representation in matters of industry laws and regulations, advice and litigation and other services provided by counterparties.

Claro Colombia employees involved in hiring intermediaries, agents, consultants, lobbyists and other representatives (including professionals such as lawyers, accountants, tax advisors, regulatory and industry advisors, etc.) acting on behalf of the Companies have a special responsibility to know with whom they are contracting and to ensure that the supplier is reliable, reputable and is not and will not be involved in corrupt activities that put the Companies at risk.

There may be signs and incidents that appear to be “warning signs” that indicate that a relationship with the third party may not be appropriate. See **Annex 1**.


If these warning signs or other signs appear, the proposed or approved relationship with the third party should be subject to further investigation and should be discussed with the Compliance Officer.

All intermediaries, agents, consultants and other representatives must have a written agreement with anti-corruption clauses that include the following:

- Indications that the third party will comply with Claro Colombia's Anti-Corruption Policy and will not engage in corrupt activities on behalf of the Companies.

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- Requirement to the third party according to risk levels, certify compliance with Claro Colombia's Anti-Corruption Policy and declare existing conflicts of interest.
- Language that allows Claro Colombia to exercise audit rights to determine compliance with Claro Colombia's Anti-Corruption Policy.
- Language that allows Claro Colombia to terminate the agreement and withhold payments if it believes that the third party has violated its Anti-Corruption Policy or any applicable anti-corruption law.
- The obligation to cooperate within investigation processes in case of violations of Claro Colombia's Anti-Corruption Policy.
- The obligation to notify Claro Colombia of any subcontracting and the submission of all information related to the subcontractor before there is any type of engagement.
- The obligation that invoices should include a clear and specific description of all invoiced items and in the event of subcontracting, the obligation to attach clearly detailed invoices from the subcontractor.
- The obligation to submit evidence of services rendered.

All agreements must be reviewed and approved by the Legal and Corporate Affairs Directorate to ensure appropriate language, approvals and terms and anti-corruption clauses.

Certifications of compliance signed by the third party must be filed in the third party's folder.

Claro Colombia should not have agreements without a termination date or with an indeterminate duration.


2.1.1 Due diligence required

Contracting with intermediaries, agents, consultants and other representatives that assist the Companies in their dealings with government entities, important commercial accounts or for industry regulatory matters, represent a high risk, therefore Claro Colombia performs the following actions when contracting with these third parties:

- These third parties must sign the certification of compliance with Claro Colombia's Anti-Corruption Policy, which are managed by the risk management areas. This information is subject to a background investigation, which may be carried out by one of the companies or by a firm hired by them.

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- In the event of any discrepancy in the qualification of the third party, the Compliance Officer must be consulted, who will verify the information and, if deemed necessary, will conduct an investigation to expand the information.
- The risk management areas shall keep a file documenting the due diligence process and the approval process for contracting third parties such as intermediaries, agents, consultants or other representatives.
- With respect to temporary unions or consortiums in which any of the Claro Colombia Companies participate, the Compliance Officer must propose due diligence procedures with an anti-corruption approach to be developed by the Companies or by an experienced third party and ensure that the representatives of the business partner know and accept the Program's guidelines and comply with the Anti-Corruption Policy.

2.2.2 Appropriate remuneration

Claro Colombia performs a fee analysis to ensure that the payments to be made to the intermediary, agent, consultant or other representative are appropriate and justifiable for legitimate services rendered or goods supplied, to be paid through banking channels, in accordance with the "Make General Purchases" procedure and/or the ANNEXES VARIABLE REMUNERATION POLICY STRATEGIC ACCOUNT COMPANIES & ANNEXES VARIABLE REMUNERATION POLICY MULTINATIONALS that are in force, as the case may be.

Likewise, there is a remuneration and commission payment policy that establishes the payment process for the companies' employees, following the "Plan, Define and Communicate Indicator Goals (Management and Remuneration)" Process.

Additionally, there is the "Commissions Policy - Integrated", which guarantees and controls the payment, commission discounts and incentives to direct and indirect sales channels.


2.3 Gifts, meals, travel, lodging and entertainment

All gifts, travel or lodging expenses, entertainment and/or food expenses that are not prohibited by law must have the required approvals and comply with the following principles:

- There must be a business purpose: All expenditures must have a justifiable business purpose. Under no circumstances should gifts, food, entertainment, travel or lodging be given for the purpose of obtaining something in return or to improperly influence or gain an undue advantage.
- No cash gifts or presents, bonuses or cash awards should be given to government entities, public servants (domestic or foreign). Likewise, any counterparty or third party that has a business relationship with Claro.

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- For the delivery of benefits to third parties and counterparties, actions and controls have been established following the "Process of Approval and Control of commercial courtesies and demonstration signs", "Manual of Revenue Assurance for control of demo or gratuitous courtesy signs".
- Complete and appropriate supporting documentation: All expenses must be supported by the necessary documentation in accordance with Claro Colombia's policies and applicable legislation and be duly reflected in the accounting books and records.
- Appropriate and approved: All gifts, invitations, meals and entertainment must correspond to the amounts authorized in the authorization levels manual and in accordance with América Móvil's policies.
- Handling of payment requests: If a public servant directly or indirectly (through a third-party intermediary) requests a payment or anything of value from a Claro employee, the employee must politely, but firmly, refuse it. Likewise, Claro employees must ensure that all third parties who are acting on behalf of the Companies also refuse to make such payments.
If any Claro employee receives a request from any person, entity or government official to make an improper payment, he or she must immediately report it to the Compliance Officer or the Ethics Line.

See **Annex 2** for examples regarding appropriate and inappropriate gifts, entertainment and hospitality.

Whenever questions arise, Employees, Intermediaries, Agents, Consultants or other Representatives must consult with the Compliance Officer in advance, via email, telephone or in person.

2.4 Facilitation payments

Facilitation payments are defined as payments to public servants that are intended to expedite, avoid or delay routine governmental actions.


Such payments are generally for minor amounts and often occur in dealings with customs, immigration or tax officials, when obtaining permits, licenses or other official documents, and in other circumstances.

These payments are difficult to monitor and there is sometimes ambiguity as to whether such payments are legal or constitute bribes.

Facilitation payments are strictly prohibited within Claro Colombia under this Policy.

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2.5 Political contributions

The Foreign Corrupt Practices Act ("FCPA") and the Colombian Anti-Transnational Bribery Law 1778 of 2016 restrict or even prohibit political campaign financing.

In some circumstances political campaign financing could be considered exchanges of special favors or business advantages and therefore constitute violations of anti-corruption laws.

Claro Colombia or any person within the Companies who is empowered to act on its behalf, shall refrain from financing any type of political campaign for the Presidency of the Republic, Governorships, Mayorships or any other position in the Public Administration that involves a popular election process, with contributions in excess of those established by the laws applicable to the matter.

The financing of political campaigns must be previously approved by the President and the Compliance Officer and will be subject to a detailed analysis due to the legal risks they represent both under the FCPA and under Law 1778 and other applicable anti-corruption laws.

2.6 Donations

Donations must be made in line with the needs of the Companies and in their best interest and only for the purpose of supporting an ongoing legitimate cause administered by the social organization.

Claro Colombia's policy prohibits social donations that are made with the intention of influencing the decision of a government official, exchanging special favors or having a business advantage.


Prior to a donation, it is necessary to perform a thorough due diligence process of the entity that will receive the donation.

The elements of a proper due diligence process are as follows:

- Analysis of the purpose of the donation.
- Understanding the type of organization. For example: whether it is non-profit.
- Identification of the owners, directors and officers and their relationship to any government officials.
- Research on the organization's reputation, corporate governance and anti-corruption commitments.

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- Form of donation (cash or in-kind).

If in the due diligence process, any potentially inappropriate donation is observed, Claro Colombia employees must immediately consult the Compliance Officer via email, telephone or in person.

If any of the following situations are observed, it could be an act of corruption and must be reported to the Compliance Officer or the Ethics Committee:

- The organization that will receive the donation refuses to provide proper documentation or suggests that the donation can only be made anonymously.
- The donation is directed to a bank account in another country or to a beneficiary other than the entity being donated to.
- An officer, director or employee of the organization receiving the donation has family or other connections to government officials.
- A government official establishes the amount of the donation and the purported recipient or solicits the donation directly or indirectly.
- The donation is made with the assumption or understanding that it may influence a decision of a government official.
- The organization receiving the donation is providing gifts or travel, lodging, meals or entertainment to government officials in connection with its charitable activities.
- The donation will be used, in whole or in part, to hire third parties with connections to government officials or who have been identified or suggested by government officials.


2.7 Mergers and acquisitions due diligence

Mergers and acquisitions are of particular concern under anti-corruption laws. An acquiring company that fails to conduct an effective and thorough due diligence review of the merged or acquired company or companies runs the risk of being liable to government authorities for past or continuing violations committed by the merged or acquired company.

In view of the above, it is Claro Colombia's policy in merger or acquisition processes to take reasonable and appropriate actions to identify past incidents of corruption or corrupt payments made by the merged or acquired company.

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Due diligence may include assessing the corruption risk profile of the merged or acquired company or companies, background investigations of key officers and directors, review and analysis of documents related to corruption risks, interviews of key employees, and forensic accounting procedures designed to identify potential illicit or improper payments.

Claro Colombia must also obtain appropriate representations and written assurances from the merged or acquired company or companies or the seller in order to obtain confidence and assurance that the merged or acquired company or companies or the seller does not violate, and has not in the past violated, anti-corruption laws and that if it does, it will be willing to assume responsibility for any such violations.

3. ANTI-CORRUPTION FINANCIAL CONTROLS

Claro Colombia has strong financial controls over its petty cash funds, accounts payable and vendor payment processes, as well as to monitor travel and entertainment expenses that employees submit as expense reimbursements.

These controls cover not only expenses or transactions incurred by employees of the Companies but also expenses incurred by third parties that are reimbursable.

The Compliance Officer, together with Internal Audit or an independent third party, will conduct annual anti-corruption audits designed to detect and prevent potential corrupt activities that violate this policy.

4. EDUCATION AND TRAINING

Claro Colombia will communicate this policy to employees and provide anti-corruption training to key employees involved in sales, purchasing, logistics, finance and accounting on an annual basis. Similarly, third parties acting on behalf of the Companies shall be made aware of this policy and receive periodic training.


Records of each training session shall be maintained by the Corporate Human Resources Directorate.

5. DEALING WITH SUPPLIERS

Employees must avoid forming any type of personal relationship with suppliers and other third parties that may create conflicts of interest, affect objectivity or give the appearance of improper conduct. In particular, making or receiving payments to suppliers, including especially those that are state-owned entities, could be an act of corruption. Relations with suppliers must be professional and suppliers must share, promote and adhere to the values and principles of Claro Colombia.

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Any employee who maintains any type of relationship with a supplier that may constitute a conflict of interest must immediately report the situation to Human Resources.

6. REPORTING COMPLAINTS

Employees, consultants, contractors and other third parties who become aware of a possible violation of this policy, the Ethics and Compliance Program or the Claro Colombia Code of Ethics, must report it to the Ethics and Compliance Committee.

Employees, consultants, contractors and other third parties may also report non-compliance with this policy anonymously to the WHISTLEBLOWER PORTAL, by going to the following link: <https://denuncias.americamovil.com/>

Claro Colombia prohibits retaliation against employees who report a possible non-compliance or suspected non-compliance with a Law, regulation, the Codes of Ethics or any of the policies.

All complaints related to possible non-compliance with this policy will be analyzed by Claro Colombia's Ethics Committee.

If necessary, the Ethics Committee will include in the investigations additional employees or external professional experts. The results of the investigations will be documented in a written report, and the Claro Colombia Ethics Committee will take appropriate action, which will include, if appropriate, individual disciplinary action against the employee and steps to prevent similar incidents in the future.

The Ethics Committee and the Board of Directors will, whenever they deem it necessary, make reports to the competent authorities communicating the acts which occurred and providing the required supporting documentation.

7. RESPONSIBILITY AND SUPERVISION

All Claro Colombia's Directorates are responsible for reporting internally to the Ethics Committee or through the WHISTLEBLOWER PORTAL <https://denuncias.americamovil.com/> bribery claims or other requests or improper acts that are in violation of the Law or this policy, in order to respond appropriately to these requirements.


8. PENALTIES

8.1 Employees

Any employee who violates this policy will be subject to appropriate disciplinary action, up to and including termination of employment.

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Any employee who knows of another employee's violation of this policy and fails to report such violation will also be subject to appropriate disciplinary action.

Violations may also result in legal proceedings by the authorities and severe criminal and civil fines in Colombia or in the United States.


The Company may also face civil liability and serious reputational damage as a result of violations of anti-corruption laws.

8.2 Suppliers, Agents and Other Counterparties

Sanctions for breaches of this policy by intermediaries, agents, consultants and other representatives will include investigations, immediate termination of the agreement, indemnification for damages, as well as possible lawsuits, investigations and complaints to the Colombian and U.S. Governments.

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ANNEXES

Annex 1. Hiring Intermediaries, Agents, Consultants and Other Representatives


List of Warning Signs

The following is a list of common “Warning Signs” that require a more detailed due diligence process when considering hiring an intermediary, agent, consultant or other representatives (hereinafter “representative”) who will interact with government officials.

- The representative is suggested or recommended by a government official.
- A government official assures that he/she will only do business through a certain representative(s).
- The representative is a relative of a government official.
- The representative suggests that he/she has “personal relationships” or special connections with government officials.
- The representative does not appear to be qualified to perform the contracted service or his primary qualification appears to be his personal relationship with government officials.
- The due diligence yields a misconception or limited information about the representative.
- The representative does not have an office or an established business.
- The representative has a reputation for getting things done.
- The representative solicits unusual or excessive payments.
- The representative suggests that for a certain amount of money he or she can fix the problem.
- The representative asks to be paid in cash or by wire transfer to an out-of-country account.
- The representative refuses to give full details of his or her time or activities.
- The representative submits an “inflated” invoice or refuses to document expenses or reimbursements when requested.
- The representative refuses to enter into a written agreement governing his or her conduct, including compliance with the Foreign Corrupt Practices Act (“FCPA”), the Colombian Anti-Transnational Bribery Law 1778, the Companies Code of Ethics, Claro Colombia's Ethics and Compliance Program, among others.
- The representative refuses to be audited periodically or randomly in accordance with his/her agreement.

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ANNEX 2. Quick Reference Examples

Gifts

	Types	Events	Individuals
Appropriate	<ul style="list-style-type: none"> Items with company logo Items of no commercial value Complimentary gifts 	<ul style="list-style-type: none"> When culturally appropriate (e.g. year-end, trade fairs or corporate events) 	<ul style="list-style-type: none"> Government officials with whom there is no pending bid or agreement
Inappropriate	<ul style="list-style-type: none"> Cash, stock and other negotiable instruments Any other instrument of value, such as gift certificates Jewelry Electronic devices or instruments Company inventories Alcohol Debt cancellation Promise of employment or personal favors 	<ul style="list-style-type: none"> Before or during tenders Before signing an agreement Frequent gifts to the same person When the entire situation gives the appearance of impropriety Receiving gifts is prohibited by law or by the employer. 	<ul style="list-style-type: none"> Government officials with whom there is a pending bid or agreement Receiving gifts is prohibited by law or by employer


Invitations and entertainment

	Types	Events	Individuals
Appropriate	<ul style="list-style-type: none"> Business dinner Snacks as part of hospitality Sports or cultural events 	<ul style="list-style-type: none"> When the business is conducted during or immediately before or after the event 	<ul style="list-style-type: none"> Government officials with whom there is no pending bid or agreement
Inappropriate	<ul style="list-style-type: none"> Massage parlor Invitation to a concert or event Club memberships Adult entertainment or movies Illegal activities Recreational events where a Company employee does not attend with the customer 	<ul style="list-style-type: none"> Before or during tenders Before signing an agreement Frequent entertainment for the same person. When the entire situation gives the appearance of impropriety. Receiving entertainment is prohibited by law or by the employer. 	<ul style="list-style-type: none"> Government officials with whom there is a pending bid or agreement Receiving entertainment is prohibited by law or by the employer.

NOTE: The above examples are not a complete list. The value and type of gift and entertainment should be considered and appropriate approvals sought before proceeding. If in doubt, validate with the Compliance Officer.

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Version control

Version	Change made	Responsible party for the change	Version change date
0	Initial version	Legal and Corporate Affairs Director - Hilda María Pardo	Mar-21-2017
1	Position names are updated, Hitss and Fusión Telmex - Comcel are included	Legal and Corporate Affairs Director - Hilda María Pardo	Oct-30-2019
2	The policy statement clarifies compliance with authorization levels for commercial relationships in accordance with the América Móvil Policies	Legal and Corporate Affairs Director - Hilda María Pardo	Jun-28-2021
2.1	The Donations policy is updated in accordance with the "Corporate Control Policy of América Móvil" and guidelines of the President's Office. This update does not require approval	Legal and Corporate Affairs Director - Hilda María Pardo	Mar-23-2022
2.2	We have updated in numeral 2.2.2 Appropriate Remuneration, the annexes of the variable remuneration policy for strategic accounts and the annexes of the variable remuneration policy. This update does not require approval	Legal and Corporate Affairs Director - Hilda María Pardo	Oct-24-2022
3	Numeral 2.2.2. Appropriate remuneration is updated, indicating that there is a remuneration and commission payment policy and numeral 2.3. Gifts, meals, travel, lodging and entertainment, which includes guidelines for giving gifts, bonuses, recognition and for the delivery of benefits to third parties and counterparties.	Corporate Legal and Sustainability Director- Santiago Pardo Fajardo	Dec-04-2023

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