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1. Introduction

América Móvil, S.A.B. de C.V. and its Subsidiaries (hereinafter, “América Móvil” or the “Company”) wish to ratify and formalize their commitment with the prevention of environmental impacts and risks associated with their operations in their respective jurisdictions. Accordingly, this Environmental Policy (hereinafter, the “Policy”) reaffirms the core principles that guide our environmental efforts as they relate to our own operations and all other operations within our value chain.

We are subject to several environmental laws and regulations in each of the countries in which we operate. The violation of such laws and regulations as a result of our operations or any other operations within our value chain, may give rise to various types of penalties and could result in material damages to our reputation and trademarks.

Based upon the above, we have developed an Integrity and Compliance Program that includes, among other things, our Code of Ethics and this Policy. The violation of our Code of Ethics, internal policies and/or the applicable environmental laws and regulations may result in civil and criminal penalties ranging from monetary fines to imprisonment for both the Company and the responsible individual.

2. Purpose

The purpose of this Environmental Policy is to affirm the principles and guidelines that govern our environmental endeavors and to establish a regulatory framework that ensures that all our efforts in our day-to-day operations are aimed at achieving a common goal, conducting our decision-making processes in accordance with efficient and resource-conserving practices, through the greatest sense of responsibility for the environment and its protection.

As well as furthering the education and culture within our stakeholders with respect to environmental footprint, development of robust environmental management systems, establishment of clear and ambitious short, medium, and long-term goals.

3. Scope

This Policy is applicable and mandatory for you and for each and every one of our Employees, both internal and external, as well as Third Parties, for all our lines of business in all our Subsidiaries and in each of the countries where we operate, so it is very important to know, understand and apply all the principles and guidelines contained herein.

4. Definitions

América Móvil’s Compliance Officer: This is the area of América Móvil responsible for implementing the Integrity and Compliance Program, including appropriate and efficient control, monitoring and audit policies and systems allowing the ongoing and periodic verification of compliance with integrity standards throughout the organization. To contact the Compliance Officer, use this email address: yocumplo@americamovil.com



Climate scenarios: A plausible representation of future climate that has been constructed for explicit use in investigating the potential impacts of anthropogenic climate change. Climate scenarios often make use of climate projections (descriptions of the modelled response of the climate system to scenarios of greenhouse gas and aerosol concentrations), by manipulating model outputs and combining them with observed climate data.

Compensation: Any action intended to prevent others from causing an environmental impact equal to the anticipated impact of the assessed externalities. Typically, it entails an investment in projects that produce environmental and social benefits.

Compliance Web Page or Microsite of América Móvil: Computing platform created or developed by América Móvil where Assessments or Due Diligence processes are completed, accessed via the following web address: www.complianceamx.com

Due Diligence or Assessment: Systematized research process focused on general elements and the background of an entity or an individual, shareholders or high management of companies, in order to identify, analyze, assess and, if necessary, mitigate, real or potential risks in connection with the matters included in América Móvil's Integrity and Compliance Program. This process is completed either before or after commercial relationships are established and/or a Contract is signed.

Ecological or environmental footprint: An indicator of the environmental impact of the activities or operations of an entity that involve the use of our planet's ecological resources *vis a vis* the relevant ecosystem's ability to replenish such resources.

Energy: Is the capacity to do work. The international system unit of energy is the Joule (J). Various forms of energy include potential energy, kinetic energy, heat energy, chemical energy, electrical energy, and light energy.

- **Cleaner energy:** Sources can be technologies that improve efficiency and reduce emissions from traditional fossil fuel-based energy generation. They complement renewable energy sources by providing reliable and low-emission alternatives to traditional fossil fuels. Some examples of cleaner energy are:
 1. Natural gas: Considered cleaner than coal and oil due to lower carbon dioxide (CO₂) emissions per unit of energy produced. Some examples are combined-cycle technology, which combines gas and steam turbines, as well as natural gas power plants equipped with advanced emissions controls.
 2. Nuclear energy: Produced through the significant amount of energy release from the atoms' nuclei. There is two ways of generating nuclear energy, the first one is through the fission method which consists in the division of the atoms within nuclear reactors. The second one, the fusion method, consists of the fusion of two light atomic nuclei combining to form a single heavier one. This type of energy is not classified as renewable because it relies on finite fuel to operate, the obtention of such fuel is a greenhouse gases intensive activity, and it produces dangerous radioactive waste.



- **Renewable energy:** Energy whose source lies in natural phenomena, processes, or materials capable of being transformed into energy usable by humans. These sources regenerate naturally, so they are available continuously or periodically, and their generation does not release polluting emissions. These sources are abundant and essentially inexhaustible, which is why they are considered sustainable and have lower environmental impacts compared to fossil fuels. Some examples of renewable energy are:
 1. Biomass: Energy produced from organic materials such as wood, agricultural residues, and biofuels derived from crops or waste products through combustion or biochemical conversion.
 2. Hydropower: Energy derived from the gravitational force of flowing or falling water, typically captured through dams or water turbines to generate electricity.
 3. Solar energy: Energy obtained from the sun's radiation, captured through photovoltaic cells to generate electricity or through solar thermal collectors to produce heat.
 4. Wind energy: Energy harnessed from the movement of air (wind) using wind turbines to generate electricity.

Low carbon economy: An economy which absorbs as much greenhouse gas as it emits.

Minimization: Any action intended to minimize or significantly reduce the anticipated impact of the assessed externalities.

Recover (Energy Recovery): Energy recovery from waste is the conversion/incineration of non-recyclable or recyclable waste materials into usable heat, electricity, or fuel through a variety of processes, including combustion, gasification, pyrolyzation, anaerobic digestion and landfill gas recovery.

Recycle: To sort and collect rubbish to treat it and produce useful materials that can be used again. In the TELCO market, it refers to the action of treating waste to generate a secondary life for raw materials, as they can become new inputs for new technology items.

Reduce: Increase efficiency in the company activities (Network Deployment, Telecom services, Customer services, Office) by consuming fewer natural resources and materials.

Refurbish: Bring an old product up to date to prolong the lifespan of the product.

Refuse: This principle encourages us to say “no” to products and services we don’t really need. By doing so, we reduce the demand for resources and the use of raw materials and cut the generation of waste from the outset.

Regional Compliance Officer: This area is responsible for implementing, monitoring and auditing the Integrity and Compliance Program of América Móvil, in a region where Subsidiaries of the Company are in operation.

Remanufacture: Use parts of discarded product in a new product with the same function. Remanufacturing is a comprehensive and rigorous industrial process by which a previously sold, leased,



used, worn, remanufactured, or non-functional product or part is returned to a like-new, same-as-when-new, or better-than-when-new condition from both a quality and performance perspective.

Repair: Restore and maintenance of a defective product so it can be used for its original purpose.

Repurpose: Using parts of a discarded product in a new product with different functions.

Rethink: It involves reconsidering how we use products. For example, opting to share products instead of buying them individually, or choosing multifunctional products that can serve multiple purposes.

Reuse: The action that allows the reuse of discarded goods or products, called waste, by giving them a use within the company that is either the same as or slightly different from their original purpose. Likewise, goods that are transferred to subsidiaries can continue to be used for the same purpose (i.e. Antennas, Radios, etc.). An important aspect of reuse is that the asset cannot undergo any process that changes its physical form.

Stakeholders, interest groups and/or interested parties: It relates to any person who is directly or indirectly affected by América Móvil's operations.

Thermo-valorization: The definition of the primary attribute of a product by reference to its heat capacity.

Value chain: The series of steps that go into the creation, distribution and sale of a product or service (i.e., from a company's relationships with its suppliers of raw materials to the means through which the finished product is delivered to the consumer), taken as a whole for purposes of the valorization of such product or service.

5. General Guidelines

5.1 Regulation, International Commitments, and Public Policy

América Móvil complies with the environmental laws and regulations in each of the countries in which we operate. Moreover, we contribute with the achievement of the objectives set forth in the Paris Agreement to limit global warming, as well as with the environmental related goals in the UN Sustainable Development Goals (SDGs) and UN Global Compact Principles. We continuously evaluate the development of other international and national environmental commitments and evaluate our potential contribution to the goals and principles set forth therein.

In addition, we engage through industry associations in public policy debates concerning the global mitigation of climate change, encouraging the adoption of policies which are aimed at achieving increased investments in clean technology solutions. Our regulatory team is in charge of managing our memberships and engagements with industry associations in an effective manner. One of the core elements of this system is the establishment of a solid governance framework to ensure that we conduct ourselves at all times in a transparent and responsible manner in connection with our engagements with industry associations at every level of our organization, including our senior management.



5.2 Management Systems, Reporting, and Transparency

América Móvil monitors its environmental performance using an IT-driven environmental management system, which is updated annually with new Key Performance Indicators (KPIs) according to international best practices, industry materiality, and company needs. Additionally, data must be entered annually and reviewed by the Energy & Emissions Leader in each operation. Final figures are validated by the Energy & Emissions department at the Corporate Office to reinforce the traceability and reliability of our emissions footprint.

Furthermore, we developed a corporate system designed to centralize information about the group's environmental initiatives and projects related to PPAs, energy efficiency, waste reduction/circular economy, fugitive emissions, transportation, among others. This system is adopted by our subsidiaries to help them in their decarbonization plans by monitoring project statuses, assessing their viability based on energy savings, emission reductions and financial payback. It serves as a single source of truth for tracking initiative implementation and positive environmental impacts. This Corporate System makes the initiatives of any subsidiary visible to the entire group, facilitating the adoption of best practices in project generation and implementation across all the countries where we operate. This approach leverages the knowledge and experiences previously gained by other subsidiaries.

In addition to our statutory obligations and with the intention of sharing our progress with our stakeholders, we are committed to develop and publish on an annual basis our environmental performance and a set of environmental indicators within our Sustainability Report. These results are assured internally and relevant KPIs are externally audited.

5.3 Climate Change

Our comprehensive sustainability strategy focuses on Enabling a Better World, through 4 pillars: Environmental, Employees, Social, and Governance. As a key player of the telecommunications sector, we recognize the impact we may have within our operations and throughout our value chain. Therefore, transitioning towards more sustainable practices is a crucial aspect within our environmental culture. We focus on reducing our carbon footprint through our [Transition Plan](#), minimizing emissions, enhancing environmental plans and projects, and actively supporting conservation efforts across our operations.

In this context, and to promote a low carbon economy with cleaner air, we have set an ambitious science-based target to reduce absolute scope 1 and 2 emissions 52% and absolute scope 3 emissions 14% by 2030, from a 2019 base year. Our goal is to achieve net-zero emissions by 2050.

On the other hand, at América Móvil we regularly assess potential adverse effects of climate change on our business considering several climate scenarios. The assessment is analyzed by the corporate sustainability team at a group and subsidiary level. Highlights from this process are shared with the Sustainability Committee and the Audit and Corporate Practices Committee, while best practices are shared among subsidiaries to strengthen América Móvil's resilience to climate change events.



5.4 Resource Management and Responsible Sourcing

We are committed to optimizing the use of resources by identifying and seizing efficiency opportunities, promoting conservation, reusing and/or recycling materials through circularity, and exploring opportunities for renewable alternatives.

Additionally, we recognize our responsibility upstream, in our value chain, in relation to responsible sourcing. Therefore, through our Due Diligence Process, we monitor that we collaborate only with commercial partners who recognize the importance of fairly-sourced minerals, in particular, 3TG (tin, tantalum, tungsten, and gold), cobalt, and other minerals.

5.5 Energy

We aim to minimize our environmental impact while remaining competitive by actively transitioning to cleaner or renewable energy sources to power our operations. This transition is one of our main pillars for our decarbonization pathway and a crucial effort to explore all market possibilities for greener energy consumption, as allowed by laws and regulations. Additionally, we are implementing energy efficiency projects to reduce our overall energy consumption, such as modernizing legacy network equipment and optimizing infrastructure and facilities. These efforts should result in environmentally responsible energy management and cost efficiency.

América Móvil's largest source of emissions, of which we have in a certain way direct control, is energy consumption (Scope 2), so we strive on increasing the level of energy efficiency across all our network equipment by monitoring and benchmarking the Group operations' performance, as well as identifying efficiency opportunities.

All our efforts in this matter are aligned with our Climate Transition Plan.

Our Journey to Net Zero		
Near Term: SBT		
SCOPE 1	SCOPE 2	SCOPE 3
Stationary Fuel Combustion <ul style="list-style-type: none"> Optimizing fuel consumption in generators installed at radio base stations through grid connection, hybrid systems or migration to full renewable energy. Implementing intelligent delay in starting generators. Vehicular Fleet <ul style="list-style-type: none"> Migrating to eco-friendly fuels such as bioethanol, when and where possible. Evaluating migrating our owned fleet to electric-power vehicle fleet. 	Energy Sourcing <ul style="list-style-type: none"> Migrating to renewable or cleaner energy in accordance with existing regulations. Seeking opportunities with our current energy providers to certify green electrical consumption through I-REC's or similar certifications. Exploring alternatives such as virtual PPAs (Power Purchase Agreements). Energy Efficiency <ul style="list-style-type: none"> Developing and executing a multi-annual plan to phase out legacy equipment. Continuously modernizing outdated air conditioning equipment in our facilities. Implementing temperature control measures. Utilizing AI solutions to shut down radio access network equipment without affecting network quality. Optimizing energy consumption by turning off electrical equipment in corporate buildings and shops during night periods. Energy Measurement <ul style="list-style-type: none"> Improving our energy measurement capabilities through the implementation of reporting systems or automation processes. Continuously improving our PUE (Power usage effectiveness) measurements in data centers. 	Engagement with Suppliers <ul style="list-style-type: none"> Encouraging key suppliers to have a carbon footprint inventory and set short- and medium-term goals. Assessing our 50 main vendors, according to their environmental strategy, encouraging them to set better GHG emissions tracking systems and find engagement solutions.



In parallel, we keep investing in developing products and services that enable our customers to reduce their carbon footprint.

5.6 Waste Management and Circular Economy

At América Móvil, we favor the adoption of circular economy frameworks aligned with the '9R' principles: Refuse, Rethink, Reduce, Reuse, Repair, Refurbish, Remanufacture, Repurpose, Recycle, Recover where and when possible, based on our conviction that the development of a circular economy is critical to the success of a low carbon economy. Moreover, the Company is committed to minimize the generation of electronic, office, and hazardous waste. When such waste cannot be reintroduced, it is disposed of in accordance with the applicable laws of the relevant jurisdiction.

The foregoing component is primarily aimed at minimizing the footprint of our entire value chain through the following actions:

- **Smart product use and manufacture.** Wherever possible, we and our suppliers must favor product designs and processes which do not generate non-valorizable waste and must strive to minimize our reliance on single-use items and maximize the use of recycled materials.
- **Extend lifespan of product and its parts.** We must actively encourage the reuse, repair, refurbish, and repurpose of the products we offer. Our customer service centers serve as natural collection points, and we must use them to promote our and our suppliers' shared responsibility and join the efforts of our value chain in fostering a circular economy in the most cost-effective manner.
- **Useful application of materials.** We must support, through alliances or foundations, the organization of recycling events and the creation of synergies conducive to the collection of waste, both of which constitute compensation options for waste, which was not properly recycled, thermo-valorized or composted.

5.7 Chemicals and Hazardous Substances

We strive to minimize the environmental impact of our operations by substituting less hazardous materials, optimizing processes, and implementing effective waste management practices. This includes promoting recycling and reuse wherever possible. For those that cannot be substituted, we ensure their disposal through certified suppliers, adhering to the highest standards and in accordance with local laws and regulations.

When applicable, suppliers are required to comply with applicable chemicals and hazardous substances laws and regulations, as well as our own standards.

5.8 Water

América Móvil is aware of global environmental challenges related to water consumption and the drawback it represents for the basic human right of access to clean and fresh water. Although our operations are not as water intensive as other industries, improving the quality and granularity of our water consumption and discharge data is central to ensure an efficient water management.



The Company's water footprint is associated primarily with human use in Corporate Offices. Our consumption in the technical part is related to data center cooling system where high efficiency closed-cycle systems are employed having a low water consumption.

Therefore, we strive to identify and implement projects to further reducing water use; foster innovation in digital services and products that contribute to solving local and global water stress; as well as raising awareness on water use and discharge within our commercial partners across the value chain while monitoring their water practices through our Due Diligence Process.

5.9 Biodiversity

We recognize the urgent need to protect and restore nature, as it is critical for building climate resilience throughout our operations, and it underpins human and planetary well-being. We are committed to strategic partnerships with local governments, non-profits, and communities to drive conservation efforts and sustainable development. Our approach ensures mutual benefits for all stakeholders while advancing our sustainability objectives. Integrating mobile technologies enables species monitoring, habitat mapping, and data-driven conservation strategies.

We recognize that most of the impact of the Telecommunications industry on biodiversity happens in our value chain. Therefore, we are committed on raising awareness within our commercial partners as to:

- Follow applicable laws and regulations related to biodiversity.
- Work to minimize negative environmental effects while performing network installation and maintenance, especially when working on protected areas, wetlands and rich biodiversity areas.

We are committed to managing the safety risks associated with electromagnetic fields (EMFs) and the impact they might have on biodiversity. Therefore, we commit to avoiding negative impacts on threatened and protected species. Additionally, we are committed to communicating clearly and transparently all the scientific information related to EMFs and their potential impact on humans and all living species.

5.10 Value Chain

In addition to the application of the foregoing Policy to its own operations, América Móvil is responsible for ensuring that each of its value chain partners, including, in particular, its suppliers, has adopted an environmental policy which is no less comprehensive than this Policy.

Therefore, all Third Parties must be subject to a Due Diligence process whereby an Authorized Assessor, the Company's Procurement Department or the corresponding Compliance Officer will assess them. Such process must be completed and documented in the Compliance web page or Microsite of América Móvil¹.

¹ For further information review the Due Diligence Protocol available at:
<https://www.americamovil.com/English/corporate-governance/integrity-and-compliance-program-icp/default.aspx>



The Procurement Department shall verify that each Third Party establishing or continuing a commercial relationship has a positive recommendation after completing the corresponding Due Diligence Process.

If the policies or activities carried out by the Third Party do not adhere to the criteria and elements considered by América Móvil, in any of the evaluated matters, a risk treatment plan is suggested and agreed upon to mitigate the risks. In the case that we do not reach an agreement on the risk treatment plan or if the Third Party does not comply with its risk treatment plan, the Compliance Officer recommends the replacement of the Third-Party.

5.11 Stakeholder Engagement

The Company is committed in hearing and understanding on a regular basis the most significant environmental topics for our various stakeholders, including the investors, members of our communities, consumers and corporate clients, and employees, among others. As well as identifying and prioritizing the sustainability impacts, risks and opportunities we should address to help ensure long-term business success and resilience. For that purpose:

- We regularly update our materiality analysis.
- We benchmark our performance via internationally recognized ratings (e.g. Morgan Stanley Capital International (MSCI), Dow Jones Sustainability Index (DJSI), Carbon Disclosure Project (CDP), Sustainalytics, and EcoVadis).
- We participate in industry and cross-industry associations and memberships with a sustainability focus.

6. Prevention

For purposes of the prevention of any environmental risk, we, the Company, and you, as an Employee of América Móvil or as a Third Party, undertake to:

- i. Abide by our Code of Ethics, the foregoing Policy and our other policies, and the applicable environmental laws of each of the countries in which we operate;
- ii. Foster the adoption of practices that favor the use of processes that have the lowest environmental footprint, yield the most social benefits and are more cost-efficient;
- iii. Minimize the footprint of our entire value chain by requiring that our suppliers adopt environmental policies which are no less comprehensive than ours, and monitor the environmental performance of our value chain partners;
- iv. Comply with the environmental performance disclosure requirements to which we are subject as a public company and refrain from including in our environmental performance reports any information which is false or lacking in terms of transparency, or from omitting to include any material information in such reports.



- v. Conduct all negotiations and execute all procurement and other transactions in accordance with our internal policies and procedures, and maintain all records thereof available for review in the event of an audit; and
- vi. Implement internal controls and, where necessary, report through our Complaints Portal and/or to the competent authorities any conduct by any Employee or Third Party which is in violation of our Code of Ethics, the foregoing Policy or the law.

7. Policy Compliance, Oversight and Verification

The Audit and Corporate Practices Committee of the Board of Directors of América Móvil, through the Compliance Officer, along with the Corporate Sustainability Department, will be in charge of overseeing, verifying and auditing the observance of the provisions contained in this Policy, and will conduct regular assessments to determine its effectiveness in order to make all necessary updates for its optimal operation.

The Corporate Sustainability Department is also responsible for assessing on a regular basis our sustainability strategy, which includes, among other things, a series of guidelines intended to prevent us from incurring environmental risks in connection with our operations and our supply chain.

If any audits are necessary, they will be conducted regularly and randomly in the various departments of the Company.

All Company Employees must support and cooperate with the work teams in charge of such audits, refraining from obstructing or blocking audit processes and from providing incorrect or false information.

Remember that we all share an obligation to observe and ensure compliance with this Policy, and to report any action in violation thereof through the Whistleblower Portal <https://denuncias.americamovil.com/>.

8. Training and Dissemination

It is extremely important for us to understand and implement all actions described herein, and with the purpose of promoting a culture of transparency, ethics and values, América Móvil offers its Employees and Third Parties online or in-person courses, which will be promoted through the Company's official means of communication, in order to provide training to help them understand the concepts, scope, and situations that may occur during daily operations, and to express any concerns they may have.

We at América Móvil are responsible for attending the allocated sessions, complying with the specified times and requested assessments.

Should you have any question or concern with respect to our day-to-day operations, do not hesitate to contact us via email at contacto-rse@americamovil.com.



9. Coordination and Cooperation

The Compliance Officer is responsible for generating and approving this Policy, to the extent possible, with respect to the Subsidiaries. However, the Subsidiaries will be responsible for complying with applicable legal obligations before the Authorities of each individual country.

Therefore, Subsidiaries shall have in place an internal compliance procedure fit for the specific environmental obligations assumed in each country, approved by the Compliance Officer, and aligned with the Emissions and Energy Task Force considering the particular risks faced and obligations imposed in each country.

In addition, Subsidiaries will ensure that they have efficient mechanisms allowing them to cooperate with others and, as applicable, coordinate internally to develop and implement Policies and activities designed to comply with environmental regulation and principles, and have all necessary elements for remediation, as applicable.

10. Sanctions

Penalties imposed following any breach of this Policy, both on Employees and Third Parties, may be of an administrative, labor or even criminal nature, depending on the severity of their actions, and will be punished in accordance with internal work rules and/or applicable laws, rules and regulations.

In América Móvil, the Ethics Committee of each Subsidiary shall be the last port of call to determine penalties in the event of breach of this Policy, without prejudice to penalties under applicable laws and determined by authorities having jurisdiction being imposed.

11. Whistleblower Portal

To file a complaint in connection with any default to this Policy or our Code of Ethics, we have made available the Whistleblower Portal at <https://denuncias.americamovil.com/>.

You, just like every other Employee of América Móvil and Third Parties, are entitled and have an obligation to report directly to your line manager, the Compliance Officer, the Subsidiary's Compliance Officer, or through the Whistleblower Portal, any behavior in violation of this Policy, our Code of Ethics or any applicable law, rule, regulation, or internal policy or procedure, and in general, any unethical behavior.

Further, it is our duty to cooperate with any internal or external investigation and keep it confidential. Employees who make a false or misleading complaint may be subject to disciplinary actions.

Remember that failure to report a serious breach of ethics can have disciplinary consequences for you, since you may be concealing an unethical or criminal act. Reports can be made anonymously if the person filing the report wishes to do so; however, we encourage informants to leave some contact information for any follow-up during the investigation.



It is important to note that América Móvil has adopted all the reasonable and justified measures to protect the confidentiality of the complaint and of the complainant; furthermore, we guarantee at every moment that no retaliation will be taken against you for filing the complaint.

Likewise, it is important to make it clear that no provision in this Policy shall be understood to prevent people from directly filing complaints before any authority having jurisdiction. In such cases, our suggestion is that it should be reported to the Legal and/or the Compliance Officer, so that they can help the authorities with any investigation, if necessary.

All reports will be investigated by América Móvil's Compliance Officer, who reports to the Audit and Corporate Practices Committee of América Móvil.

The Compliance Officer is in charge of the supervision and operation of the Whistleblower Portal and will send to the Ethics Committees of each Subsidiary the corresponding complaints, for their proper investigation.

12. Questions and Comments

If you have questions, comments, or suggestions regarding this Policy, please contact us in the following email address: yocumplo@americamovil.com.