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1. Introduction

América Móvil, S.A.B. de C.V. and its Subsidiaries (hereinafter, “América Móvil” or “the Company”) confirms and officializes its commitment with the values and principles of entrepreneurial ethics and with the effective control of Corruption and illegality through this Sponsorship Policy (hereinafter, “the Policy”).

América Móvil has developed an Integrity and Compliance Program, which includes among others, a Code of Ethics, several internal Policies, as well as this Policy, to prevent and fight Corruption.

The breach to the Code of Ethics, to the internal policies, or to the law that is applicable on matters of anticorruption, even when the action or operation is done out of Mexico, may generate civil and criminal penalties, which go from fines up to imprisonment sentences, and they are applicable both at personal level and at Company Level.

2. Objective

The objective of this Policy is to establish the principles, guidelines and procedures for the control of Sponsorship provided by América Móvil, in such a way to ensure that they are granted with the only aim of promoting the brand identity and that they are aimed to represent the values and principles of the Company.

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, who have as their functions and responsibilities the selection, contracting, delivery and recording of Sponsorships for all our lines of business in all our Subsidiaries and in each of the countries in which we operate. Likewise, this Policy also applies to the Employees and Third Parties who receive some kind of Benefit of the Events sponsored by the Company.

4. Definitions

Friend(s): Any person, external to the family, with whom the Employee keeps a personal relation or affinity link, the term includes close friendships and contacts of personal business.

Beneficiary: Corporation that receives and benefits from the Sponsorship.

Benefit(s): They are the contributions received by the Company for the participation in the Event Sponsorship, including but not limited to, presence and mentioning of the brands of the different communication media such as press, television, radio, screens, billboards, promotional items, or free accesses or accesses with discounts to the sponsored Events.



América Móvil's Code of Ethics: An institutional document that establishes the principles of conduct and values of América Móvil, it is of general application for all the Employees and Third Parties, or any other person linked with the Companies of América Móvil.

Ethics Committee of Subsidiary: Collegiate organization comprised by members of the top management of each Subsidiary, in charge of managing the Complaints received through the Portal and released to the Subsidiary in question, besides verifying the application and compliance of the Code of Ethics and the internal policies that stem from it. Likewise, this Committee is aimed to determine the activities that will take place before defaults to the Code of Ethics and to the policies by its Employees or Third Parties.

Conflict of Interest: It is a way of corruption that consists of an action that may be unduly influenced by some Personal, Family or Third Party interest. There is a Conflict of Interest when an Employee or a Third Party, guides its decisions or acts for his/her own benefit, which is frequently of economic or personal kind, opposing the responsibility of acting in the benefit of the Company when he/she is representing it.

Contract: Agreement between two or more people to create, transmit, modify, or extinguish rights and obligations.

Corruption: In the public field, it is the power abuse for one's own benefit or the Company's benefit, and it is present when interacting with Public Officials or Governmental Entities, it is known as Public Corruption. In the field of private parties, this is, when they perform actions or omissions aimed to get some undue benefit for the Company, personnel or for a Supplier, and it is known as Private Corruption.

Due Diligence: It is the investigation of background of an individual or corporation, in order to identify potential legal, financial, Corruption, money laundering risks, or those affecting the Company reputation.

Employee(s): Any person or persons who is (are) employed under an individual or collective labor agreement by América Móvil or any of its Subsidiaries.

Event: It refers to presentations, sportive, musical or cultural corporate acts, etc., such as conventions, tournaments, fairs, theater plays or concerts, among others.

Relative(s): It shall be understood up to the third grade of consanguineal relation. This is, close Relatives are considered as the following: sons, daughters, spouses, father, mother, grandparents, uncles/ aunts, grandchildren and cousins.

Government: The set of people and organizations who are institutionally entrusted with exerting the political power to lead, control and manage a political-administrative division. It includes the decentralized organizations and the companies with a majority of state ownership



Group of Interest: Groups of people, organized around a common interest, and who receive the Sponsorship Benefits. There are internal Groups of Interest such as shareholders, Employees, chief officers, etc., and external Groups of Interest such as customers, suppliers, communication media, etc.

Compliance Office: It is the area of América Móvil responsible for establishing an Integrity and Compliance Program that includes proper and efficient policies and systems of control, surveillance and auditing, and which examines constantly and periodically the compliance of the integrity standards all over the organization. yocumplo@americamovil.com

Sponsorship: Economic support (Monetary Sponsorship) or support in kind (Sponsorship in Kind) for an event in exchange for a commercial Benefit for the Company in order to promote the brands and/or as advertising or commercial strategy by holding a Contract.

Politically Exposed Person or PEP for its acronym in English: Those individuals who comply, or who have been entrusted with prominent public functions, such as, for example, the Heads of State or Government, high level politicians, high level or high range governmental or judicial officials, high level executives of corporations, officials of important political parties. It includes decentralized organizations, companies with a majority of state ownership, public trust funds, autonomous organizations and political parties.

Portal of Complaints: It is the internal platform of América Móvil through which the Employees or Third Parties may complain anonymously and confidentially about any breach to the Code of Ethics and/or to the Company policies, <https://denuncias.americamovil.com>

Integrity and Compliance Program: Program developed and supervised by the Compliance Office, including but not limited to: (i) the preparation of policies and other guidelines of the Company in order to comply with the currently valid law; (ii) the identification, prevention and mitigation of the operational and legal risks in order to guarantee a long-term reputational value of the Company and generate more certainty for its value chain; (iii) establishing proper and efficient systems of control, surveillance and audit, which constantly and periodically examine the compliance of the integrity standards in all the organization; and (iv) the operation management of the Portal of Complaints and coordination of training on matters of compliance.

Red flags: Every sign that poses a risk of Corruption, fraud, Bribery, money laundering or any unethical practice in virtue of the law on applicable matters of anticorruption.

Public Official (national/foreign): It is the person having a public job position or that is Employee of a Governmental Entity or any other decentralized unit of it, either elected or appointed, representing any Governmental level, this is, federal, national, state or municipality; including but not limited to, its legislative agencies, ministries or secretariats, judicial agencies, investigation agencies and organizations. Likewise, any member belonging to some political party or a candidate to any position of election. Likewise, the officials of public international organizations (the World Bank, the United Nations, the International Monetary Fund).



Bribery: it is a form of Corruption that consists of offering, promising or granting ,as well as demanding or accepting any benefit, either by cash or in kind, directly or indirectly to other person, so that every person does or stops doing something to ensure an undue advantage, or get, lead or hold business for a specific company.

Subsidiary: Any entity that is under América Móvil's control.

Third Party(ies): Distributors, representatives, consultants, commercial partners, agents, intermediaries, customers, contractors, lobbyists, advisors, or suppliers who are part of the value chain of América Móvil or those who represent the Company during an interaction with another Third Party, Government or Public Officials. This includes the civil society organizations and the education, charity, cultural or sports institutions to which the Company wants to make a Donation.

5. General Guidelines

5.1. Requirements, Prohibitions and Conditions

In order to grant Sponsorship, either Monetary or in Kind, there must be compliance with the guidelines developed in this number.

A. Requirements

Every Sponsorship should:

- Be aimed to Events that share the vision, values, and philosophy of social responsibility of the Company.
- Be budgeted by the Marketing Direction of AMX and approved by the CEO in terms of budget.
- Have a Contract duly signed and authorized by the Legal Direction.
- Have a fiscal receipt that includes all the requirements of deducibility in accordance with the applicable laws.
- Be properly recorded in the accounts, books and other accounting records, according to their nature, temporality and amount spent for its correct accounting and fiscal treatment.

It is possible to grant Monetary Sponsorship, however, **under no circumstances may be in cash:** It shall be done with a nominative check or by wire transfer in favor of the entity that shall receive the Sponsorship.

B. Prohibition to grant Sponsorship

It is forbidden to offer or make Sponsorship to:

- Individuals, except when they are:



- Investigators
 - Athletes
 - Artists
 - *Gamers*
 - *Influencers*
- Public Officials, Political Parties and/or their candidates.
- Institutions belonging to or related to Public Officials.
- Institutions that do not get identified or do not practice ethical values similar to those of the Company.
- Institutions that may pose a Corruption risk or which may affect the Company reputation.
- Unions.
- Communities, for the purpose of influencing community decisions in participatory processes in which the Company has a current, future or foreseeable interest (for example, communities that own territory in the process of indigenous consultation or similar).

C. Special Cases

The Sponsorship of Events organized by Government Entities should be limited only to the Benefit, and in no way, should it be conditioned to:

- The rendering of governmental services belonging to the field of powers of the Entity that makes the Event;
- The awarding of some tender or public bid;
- The delivery of some additional good or service;
- The write-off of legal obligations of the Company.

In case of a Sponsorship to Governmental entities, the Marketing Direction should keep a record with the chronology of meetings (including the participants' names) of the interactions held with the Public Officials, keeping a copy of all the mail related to the negotiation and notes or minutes of the topics addressed at the meetings.

D. Related Benefits

The Benefits related to the brand promotion, which are received by the Company as part of the Sponsorship, such as the accesses to the Events, shall be managed by the Marketing Direction according to the following:

- The delivery of Third Party-related Benefits should be assigned with objective criteria associated to the sales, renovations, volume, permanence, etc.
- The delivery of Group of Interest-related Benefits should be reviewed by the Direction General, who shall determine the quantities and receivers.
- The delivery of Employee-related Benefits should be done by means of the terms and conditions established by the Marketing Direction, along with the Human Resources Direction.
- In no case, is it possible to deliver related Benefits:



- To Public Officials.
 - By direct assignment to the Employees who manage accesses to Events.
 - To people or Entities not complying with the mentioned criteria, who are Friends or Relatives
-
- The delivery of all the Benefits (Third parties, Groups of Interest or Employees) should be reported in a written form to the Direction General and informed to the Compliance Office.
 - When the Direction General determines so, the delivery of related Benefits should be approved previously by this office.
 - Complimentary tickets should be accompanied by an invitation letter that shall be sent with an individual name or with a Corporate name of the Third Party receiving the Benefit, having to include the description of the Benefit in quantity and type.

It is forbidden to resell or trade these tickets. Any action contrary to this one should be informed to the Compliance Office, or it should be denounced at the Portal on the Internet: <https://denuncias.americamovil.com>

The Compliance Office should approve, in a written form, any exception to this Policy.

5.2. Procedure to grant the Sponsorship

- i. The requesting area should submit to the Marketing Direction, the “Form of Sponsorship Request” duly filled out and signed, identified as Annex A herein. The request should be attached with:
 - The offer;
 - The Sponsorship *business case*; and
 - The information provided in the document “Required Documentation of the Entity requesting the Sponsorship”, which is provided in Annex B, of this Policy.
- ii. The Marketing Direction should perform an analysis on the Sponsorship origin. For that, you should take into consideration the following elements:
 - If it gets aligned to the criteria and objectives of exposure and trading of the brands;
 - The profile of the attendants at the Event;
 - The social impact;
 - The strategic Benefits for the brand positioning;
 - The possible Red Flags of the Sponsorship in terms of Annex E of the present document; and
 - Direct and indirect costs of the Sponsorship.
- iii. In case that the Marketing Direction deems the Sponsorship is convenient, it should send the necessary information and documentation referred to in Annex B hereof, to the Finance Direction for it to be validated.



- iv. Once the Finance Direction validates information, it should request the Compliance Office to carry out a Due Diligence of the entity requesting the Sponsorship, according to the methodology followed in the “Form of Report of Due Diligence” contained in Annex C hereof, as well as in Annex D “Information Sources for Due Diligence”.

Due Diligence should include at least the investigation of the following elements:

- Of the key officials of the requesting entity;
- Of the members of its board of directors;
- Of the legal representative;
- The PEP identification, by means of the information sources listed at Annex D of this Policy;

Furthermore, it should be verified that:

- There is no Conflict of Interest between the Employees, the Company and the entity that will receive the Sponsorship;
- There is no undue benefit for any Third Party or Public Official, either directly or indirectly; and
- The Sponsorship delivery does not pose a way of Bribery or Corruption according to the applicable anticorruption law.

The result of the investigation should be recorded in the “Form of Report of Due Diligence” that is attached hereto as Annex C.

If, because of the Due Diligence performed, there is identification of the red flags of Corruption, the Compliance Office should determine, based on the rating of the risk level, if these red flags allow or do not continue with the authorization process of the Sponsorship.

In its case, the Compliance Office shall issue its approval by means of the “Form of Recommendation of the Compliance Office” that is attached as Annex F in this Policy.

In order to update and monitor the possible red flags of Corruption that may come up from the requesting entities, the report of Due Diligence for Anticorruption shall be valid for 2 (two) years, starting from the material grant of the Sponsorship. Once this time has elapsed, the beneficiary of the Sponsorship should start, again, the Due Diligence procedure, or any area at any moment, in case it is deemed necessary.

In case of requesting a Sponsorship after the end of the valid term of the Contract for the same authorized entity, the requesting area should verify with the Compliance Office if it is required to update the report of Due Diligence, who shall inform the requesting area about the data and information that should be requested again to the requesting entity.

At the end of each exercise, the Compliance Office shall submit a final report of the Sponsorships granted to the CEO and to the Marketing Direction.



- v. The Compliance Office should issue its recommendation as a result of the analysis referred in the previous number by means of the “Form of Recommendation of the Compliance Office”, provided in Annex F, attached to this Policy.
- vi. In case that the Compliance Office issues a positive recommendation of and with the validation of the Finance Direction, the requesting area may send a request to the Marketing Director for its final authorization. Otherwise, the sponsorship request should be rejected, and this should be notified to the corresponding entity.
- vii. If the amount requested for Sponsorship is equal to or higher than \$100,000.00 (one hundred thousand U.S. Dollars 00/100) the legal currency of the United States of America, or its equivalent in local currency, you should also request the authorization of the CEO.
- viii. Once having received the authorization from the Marketing Director and/or from the CEO, as the case may be, you shall make the order request at the SAP system, and it shall proceed to request the preparation of the Contract to the Legal Direction.
- ix. The Beneficiary, upon receiving the Sponsorship, should delivery, duly filled out, the form of “Certification of compliance with the anticorruption standard” provided in Annex H hereof, which compels not to transfer the funds or goods received by the Company, to no third party, and which commits to use the Sponsorship exclusively for the aims authorized by the Company.
- x. The Finance Direction shall be responsible for verifying the fiscal validity of the receipt delivered by the Beneficiary.
- xi. Once having delivered the Sponsorship (either Monetary or in Kind) you should input the accounting record that corresponds at the SAP system, with enough detail for its identification.
- xii. The Marketing Direction shall have a report on the use of the resources or goods delivered as Sponsorship, which includes evidence (documents, photos, videos, etc.) which support the exerting of resources or goods.

5.3. Control of Entities receiving Sponsorship

The Compliance Office should integrate and keep an updated database of the entities, both of those that have been authorized to receive Sponsorship from the Company, and of those that have been rejected.

The Compliance Office shall keep the file of each of the Beneficiaries, that will contain, at least, the following information:

- Corporate information collected during the request paperwork (Annex B).
- Form of Sponsorship Request, duly filled out, and as the case may be, authorized.
- Form of Due Diligence Report for Sponsorship.
- Form of Recommendation of the Compliance Office.



In case of having authorized the Sponsorship, besides the above:

- Contract of Sponsorship.
- Form of Certification of compliance with the anticorruption standard.
- Copy of the wire transfer made, or the payment check, as well as of the account statement that shows the payment.
- Report of use of the resources or goods granted as Sponsorship.

6. Supervision and Verification of the Policy Compliance

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 Policy, and periodically assessing 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.

The Compliance Office is also responsible for periodically evaluating its Integrity and Compliance Program which includes, among others, a series of measures that are aimed to prevent the acts of Corruption. Likewise, it is responsible for providing orientation to the Employees regarding this Policy, through the email account yocumplo@americamovil.com along with the immediate bosses.

If it is necessary to carry out audits, they shall be done periodically and randomly to the different Company areas.

All the Company Employees must be committed to support and collaborate with the work teams in charge of doing such audits without hindering or obstructing the auditing processes and without providing false or incorrect information.

Remember that it is everyone's obligation to comply and make comply with the present Policy and report any act that is against it through the Portal of Complaints <https://denuncias.americamovil.com>.

7. Training and Release

For us, it is very important to understand and put into practice what is described in this Policy, and in order to encourage a culture of transparency, ethics and values, América Móvil offers to its Employees and to the Third parties, on-line or in-person courses, which shall be released through the official means of communication of the Company in order to train them so that they can understand the concepts, scopes, situations, as well as to express the concerns that may happen on the day-to-day duties.

It is everyone's responsibility, of all of us who work at América Móvil or its Subsidiaries, to attend the assigned sessions, and comply with the times and the requested assessments.



8. Cooperation and Coordination

The Compliance Office is responsible for generating and homologating, as much as possible, this Policy regarding the Subsidiaries. However, the Subsidiaries are those responsible for complying with the legal obligations applicable before the Authorities of each country.

Due to this, the Subsidiaries should have an internal procedure of standard compliance, considering the specific obligations of each country on topics of legality in Donations, as well as anticorruption and antibribery.

Likewise, the Subsidiaries must ensure that they have efficient mechanisms that allow them to cooperate and, as it corresponds, they must establish between them a coordination at internal level in the development and implementation of policies and activities to prevent acts of Corruption in general.

9. Penalties

Penalties due to the default of this Policy, both for the Employees and for the Third parties, may be of administrative, labor, or even criminal type, depending on the seriousness of the act and they shall be penalized in accordance with the internal regulation of work and/or of the applicable law.

At América Móvil, the Ethics Committee of each Subsidiary shall be the last instance in the determination of the penalty in case of default of this Policy, with no harm that such default may be penalized, additionally, by the applicable law and the competent authorities.

10. Portal of Complaints

In order to complain about any default to this Policy or to our Code of Ethics, we have available for you the Portal of Complaints at <https://denuncias.americamovil.com>

You, just like each of the Employees of América Móvil and of the Third parties, are entitled and obliged to report directly to our hierarchical boss, to the Compliance Office, to the Compliance Office of the Subsidiary, or through the Portal of Complaints, any behavior that breaches this Policy or any law, regulation, Policy or internal procedure applicable and in general, any unethical behavior.

Likewise, it is our duty to cooperate with any internal or external investigation and keep its confidentiality. The Employees who make some false or intentional complaint may deserve disciplinary penalties.

Remember that not reporting a serious ethical fault may have disciplinary consequences for you, since you may be covering an unethical fact or a crime. It shall be possible to file anonymous complaints if the plaintiff wishes so, however, it is recommended to leave a contact for the investigation follow-up.



It is important to know that América Móvil has adopted all the reasonable and justified measures to protect the confidentiality of a complaint and of the plaintiff, and also guarantee at every moment that no kind of retaliation shall be taken against you for having filed the complaint.

Furthermore, it is important to make clear that no provision in this Policy shall be understood as an obstacle so that people may directly file complaints before the competent authorities. In such cases, it is recommended to notify our Legal Direction and/or the Compliance Office so that, if necessary, it acts along with the corresponding authorities.

All the complaints shall be supervised by the Compliance Office of América Móvil, who in turn, is liable to the Committee of Auditing and Corporate Practices of América Móvil.

The Compliance Office is the instance that is in charge of the supervision and operation of the email for complaints, and it shall send to the Ethics Committees of each Subsidiary, the corresponding complaints for its proper investigation.

11. Doubts and Comments

Should you have any question related to this Policy or any comment or suggestion, write to us to the email yocumple@americamovil.com



Annex A – Form of Sponsorship Request

Request date: _____

Sponsorship Description
Sponsorship Object:
Description and date of Event:
Amount of Sponsorship and payment method:
Benefits to be received by América Móvil from the Sponsorship:
Benefit that the Company shall receive from the Sponsorship:
Application of resources of the Sponsorship:
How did the link originate for this Sponsorship?
Has the Sponsorship Beneficiary received other Sponsorship(s) from the Company in the last twelve months? (Yes / No) If yes, please provide detail on the amount and type of Sponsorship(s).



Is the Beneficiary a Governmental Entity, a Public Official or does it represent a political party?

(Yes / No)

If yes, please provide detail.

Currently, is there a business relation between the Sponsorship Beneficiary and the Company?

(Yes / No)

If yes, please provide detail.



General Information of the Entity that requests the Sponsorship				
Name or Corporate Name:				*Taxpayer's code:
Address:				
Phone No.:				
Website / Social Networks:				
Act of Incorporation:	No.	Notary Public:	Incorporation date:	
Name of Legal Representative and data of power-of-attorney		Taxpayer's code:		CURP:
Belongs to the public sector:	Yes / No			

****Please attach a copy of the documentation with a valid term no longer than 3 months.***

GENERAL DATA OF CONTACT OF THE REQUESTING ENTITY	
Full name:	
Job position:	
Email:	

REQUESTED BY

[Name, position and signature]

REVIEWED BY

Finance and Administration

REVIEWED BY

Compliance Officer

AUTHORIZED BY

Marketing Direction

AUTHORIZED BY

CEO



Annex B – Documentation Required from the Entity requesting the Sponsorship

The following documentation shall be facilitated by the requesting entity in order to start the paperwork of authorization of the Sponsorship from the Company:

Complies	Necessary Information
	1. Copy of the Act of Incorporation.
	2. Copy of the Public Deed that accredits the personality of the legal representative.
	3. Official ID of whoever is set as Legal Representative.
	4. Certificate of Registration to the Organization that collects taxes, or Fiscal Identification Sheet.*
	5. Address verification document.
	6. Report of compliance of fiscal obligations (current month)
	7. Card of Employer's Registration
	8. Copy of the front page of the bank statement in the name of the Institution where there is the account number, the CLABE reference number or the information necessary to make financial transfers.*

*The document should be submitted with a valid term no longer than three months since the request date of the Sponsorship.



Annex C- Form of Due Diligence Report

Background Report

Date: _____	
Requesting employee: _____	
Job position: _____	
Area: _____	
I. Executive Summary	
II. Initial Information provided form the Entity that requests the Sponsorship	
Name or Corporate Name	
Corporate Object	
Contact Name and general info	
Main activities	
Name of board members and key executives	
III. Detail of Findings	
A. General Information	
B. Relations with Government	
C. Legal background (including penalties, fines, and disabilities)	
D. Potentially adverse information	



V. Annexes

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PREPARED BY

REVIEWED BY

[Name, position and signature]

Compliance Officer



Annex D – Information sources for Due Diligence

An effective investigation on reputation and background, to detect possible *Red Flags* integrates databases and publications issued by different information sources, such as:

1. Compliance databases (*World Compliance, World Check*),
2. Lists of those penalized and disabled by local, national and international organizations (*OFAC, World Bank*),
3. Blacklists and objectives of international action (OFAC, Interpol, FBI, PGR),
4. Search engines (*Google, Bing*),
5. News and communication media (Local, national and international information media).

As follows, there are the lists of information sources of compliance to consider:



Activity	Description	Items	Findings
A. Search of adverse notes	Search of electronic news and information of public domain, national and international, to verify if there are articles, notes or negative reports*that may affect the America Movil's reputation * The revision should be at least for the last 2 years. You shall print the first four websites of the searches shown by the search engine.	<input type="radio"/> Institution	Yes <input type="radio"/> No <input type="radio"/>
		<input type="radio"/> Executive of the Institution	Yes <input type="radio"/> No <input type="radio"/>
		<input type="radio"/> Board of Directors	Yes <input type="radio"/> No <input type="radio"/>
		<input type="radio"/> Key Employees	Yes <input type="radio"/> No <input type="radio"/>
		<input type="radio"/> Executives or Key employees (PEP)	Yes <input type="radio"/> No <input type="radio"/>
		Search done on:	
		<input type="radio"/> Internet	Yes <input type="radio"/> No <input type="radio"/>
		<input type="radio"/> Other media (specify)	Yes <input type="radio"/> No <input type="radio"/>
	Remarks:		
B. Identification of PEP / foreclosure / Surveillance lists/ Blacklists	Revision of: - PEP - Foreclosure - Surveillance lists - Blacklists	<input type="radio"/> List of penalized public officials	Yes <input type="radio"/> No <input type="radio"/>
		Licenses used	
		<input type="radio"/> Trace	Yes <input type="radio"/> No <input type="radio"/>
		<input type="radio"/> World Compliance	Yes <input type="radio"/> No <input type="radio"/>
		<input type="radio"/> World Check	Yes <input type="radio"/> No <input type="radio"/>
		<input type="radio"/> Lexis Nexis	Yes <input type="radio"/> No <input type="radio"/>
		<input type="radio"/> Dow Jones	Yes <input type="radio"/> No <input type="radio"/>
	Remarks:		



Annex E – Red Flags of Corruption

As follows, there are the scenarios and behaviors that, in general, act as Red Flags that indicate the possibility of Corruption or a Bribery situation.

Likewise, this indicates the risk level that each scenario represents and how you should act when identifying it.

	Yellow flags
<ul style="list-style-type: none">• That it is a Governmental Entity the one that requests the contribution.• That it is Public Officials or its Relates, who are executives or members of the Steering Committee of the Sponsorship requesting entity.	
	Red Flags
<ul style="list-style-type: none">• Lack of clarity in the corporate object of the entity requesting the Sponsorship.• Lack of clarity in the use of the Sponsorship.• Refusal of the requesting entity to inform to the Company the names of the executives or members of the Steering Committee of the Sponsorship requesting entity.• Lack of documentation or incorrect information provided by the requesting entity.• That the contribution is a condition for performing or expediting some paperwork before some authority.• That the contribution is a condition to start or maintain a business relation.• That there is adverse information (related to fraud and/or Corruption) of the requesting entity, its key executives, or members of the Steering Board.• That the requesting entity, any of its key executives or members of the Steering Board, are listed at any of the blacklists.	



Annex F – Form of Recommendation of the Compliance Officer

Name of the entity requesting the Sponsorship:	Date:
Amount of Sponsorship:	

Background:

Critical Points:

Analysis and considerations:

Conclusions:

REVIEWED BY

AUTHORIZED BY

[Name, job position and
signature]

Compliance Office



Fill-out instructions of the Form of Recommendation from the Compliance Office

Background:

A brief description of the transaction, mentioning:

- Name of the entity requesting the Sponsorship
- Type of current relation of the Company with the requesting entity (supplier, potential Employee, association, etc.)
- The impact of Sponsorship for the requesting entity (value and condition of the transaction)
- Motive of Sponsorship
- Commercial benefit or brand presence of the Company

Critical points:

- Potential risk identified (interaction with entities of Government or Public Officials, high decision power at the structure, others)
- Default of some of the Company policies.

Analysis and considerations:

Consider the anticorruption values, policies, and procedures of the Company, as well as the risks that could be incurred in when approving of the transaction. Give foundations on the response, whether there is compliance or default with the criteria marked by the Company, as well as any specific requirement if the Sponsorship is approved.

Conclusions:

- If it is considered/ not considered that with the Sponsorship mentioned above, someone is acting in a way contrary to the Company policies



Annex G – Form of Output of Goods for Sponsorship

I hereby request to you the list of the goods described below, to carry out the Sponsorship requested by *[Name of department or requesting area]* in relation to *[Describe the aim of the Sponsorship]*

Date: _____

Requester's Name: _____

Job Position: _____ Area: _____

Ref.	Description	Unit	Quantity

Remarks:

DELIVERY

I RECEIVED GOODS

[Warehouse Management]

[Name and signature]



Annex H – Certification of Compliance with Anticorruption Standard

Date: _____

By means of the following statement, the Treasury of [Beneficiary's Name] certifies that it receives as **Sponsorship** [money, in kind, service rendering or others (specify)] the quantity of [Quantity and description of the goods and services granted] that I list as follows, and which was delivered to us by the Company, in order to [Specify the Sponsorship object].

Quantity	Type of Sponsorship	Description	Check No. or reference of wire transfer (in case it applies)

(Add as many lines as necessary)

Likewise, I declare under oath of telling the truth, that there are only the elements described that I have stated in the previous point, and that they [goods, money, services, or others (specify)] are not going to be traded or transferred to a third party and they shall not be used to breach any applicable law. The Sponsorship shall be aimed only to the objectives of my corporate object.

Received,

[Autograph signature of the legal representative of the Sponsorship Beneficiary]

Name: [Full name]

Job position: [Indicate the job position of the person who certifies]