



CODE OF CONDUCT

COMMITMENT TO INTEGRITY

A LETTER FROM EDUARDO DIAZ CORONA



Dear Colleagues:

Highly successful companies provide their customers with great products and outstanding customer service. This, however, is only part of what makes them a great success. Companies that demonstrate the values of honesty, integrity and respect toward their customers and employees build an ethical and compliant culture that goes beyond products and services. These

companies recognize that an ethical and compliant culture creates intense customer loyalty, attracts employees committed to fueling the company's continued growth and increased market share and ultimately demonstrates the company's commitment to being a good corporate citizen. Achieving this greatness requires a 100% commitment and participation by all employees.

This year TracFone Wireless ("TracFone" or "Company") is elevating our ethics and compliance efforts starting with the release of an expanded Code of Conduct (the "Code"). This Code is based on TracFone's ethical standards and fundamental business principles and values that every employee is expected to fulfill. Additionally, the Code provides references to policies and procedures that give greater detail on the topics found within the Code. The Code, as well as the Company's policies and procedures, is meant to guide all employees in their daily activities and impress upon them our commitment to ethical and compliant practices.

We all share the responsibility of making the principles outlined in this Code part of our everyday business practices. These standards are the cornerstone of each individual's work, allowing TracFone to be the #1 provider of no-contract wireless communication, provide outstanding customer service, attract strong business partners, and acquire the most talented individuals to drive the Company's continued success. Every employee must strive to conduct business with the highest degree of honesty and ethical behavior, be direct, clear, and ethical in their communications and actions, and speak with honesty and respect. Further, we all have the responsibility to raise promptly any concern regarding the failure by the Company, an employee or a business partner to meet the high ethical standards outlined in the Code.

Without exception, every employee is expected to read, understand, and strictly adhere to the principles contained in this Code of Conduct. After reading the Code, each employee is encouraged to discuss its contents with colleagues at TracFone, and to seek additional information from Legal's Ethics and Compliance department if any part of the Code is unclear.

Thank you for your commitment to helping TracFone continue to be recognized as a respected and successful company.

Sincerely,

Eduardo Diaz Corona

TRACFONE CODE OF CONDUCT

This is TracFone's Code of Conduct. It is an important document that you are required to read, understand, and follow. The rules and guidelines contained in this document define the acceptable behavior and principles that all TracFone employees, contractors, consultants, agents, and Business Partners are expected to use to guide their daily activities. By following these principles and values, you will avoid situations that may damage TracFone's reputation and possibly impact your employment or contract with the Company.



WHAT IS THE CODE OF CONDUCT?



WHO IS THE CODE OF CONDUCT FOR?

Every employee, director, and officer must follow the Code of Conduct. Contractors, consultants and agents working on our behalf or in our name and those who conduct business activity for TracFone must also follow the Code of Conduct. Business Partners, those who act in an outsourced capacity or fulfill obligations TracFone may have with another party, must also conduct their activities consistent with the requirements of this Code of Conduct.

WHY DO WE NEED A CODE OF CONDUCT?

To make employees aware of our core values and business principles and to describe the expected behavior of our employees.

HOW CAN THE CODE OF CONDUCT HELP YOU?

This Code of Conduct contains practical advice on laws and regulations as well as direction to find additional information and company resources to help you, should you have any questions.

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INTRODUCTION

TracFone's reputation is built on strong ethical values and business principles. Each employee is responsible for conducting business with the highest degree of honesty and ethical behavior. Following TracFone's ethics principles and values will safeguard TracFone's reputation. These principles and values should be the cornerstone of each employee's work, allowing TracFone to be the #1 provider of no-contract wireless communication, provide outstanding customer service and excel in all it does.

Because all employees are responsible for maintaining TracFone's high ethical standards, each employee is required to report any actual or suspected violations of the Code of Conduct or any laws or regulations. There are many ways employees can make reports. Reporting can be done to the employee's immediate manager or supervisor, a senior member of management, someone in the Human Resources department or to the Ethics & Compliance Department directly. Under TracFone's Anti-Retaliation Policy, employees who make reports in good faith will not be retaliated against for making the report.

All employees
are responsible
for maintaining
TracFone's
high ethical
standards.

TRUSTFONE

Employees who are uncomfortable with submitting a report in person or directly to management can submit the report to TrustFone, TracFone's Ethics Hotline, in a variety of ways:



ONLINE

tracfone.ethicspoint.com



TELEPHONE

1-800-208-1176
Speak with the Ethics
Hotline administrator or
leave a message



MAIL

Ethics & Compliance
Department:
P.O. Box 160670
Hialeah, FL 33016



EMAIL

wrongdoing@tracfone.com

PLEASE NOTE:

TracFone's TrustFone website, hosted by EthicsPoint, is the only means by which an affected employee can submit a complaint anonymously.

MISSION

At TracFone, our mission is to bring people closer together and ensure that our customers have access to the latest wireless communication services at affordable prices.

VISION

Our vision is to maintain our leadership position in the no-contract wireless business segment. Our resources are focused on devising and implementing successful strategies to achieve our objectives and we are committed to maximizing the value of the Company's investments. We must aspire for our name to continue to be a synonym of excellence in the telecommunications industry. We are determined to be the best, and to such end we use all the tools necessary and available to participate in all those efforts that we deem relevant to our activities as a company.

STRATEGY

To achieve our mission and vision, we intend to build on our leadership position, continue to expand our business, offer our customers new services, continue to optimize coverage and implement new technologies. We firmly believe that our future growth will depend on our ability to create value for our customers.

Consistent with this objective, our corporate strategy is based on the three pillars of growth, integration, and optimization, which we seek to strengthen through:



GROWTH

Growing revenues and profits, controlling our costs through the standardization of our corporate governance practices.



INTEGRATION

Offering our customers a broad range of telecommunications products and services with enhanced features and treating customers the way we ourselves would want to be treated.



OPTIMIZATION

Ensuring our customers receive quality and value, in a cost effective manner.

BUSINESS VALUES AND PRINCIPLES

BUSINESS VALUES AND PRINCIPLES

Integrity

Truth and honesty compose the foundation upon which TracFone has built its business. These two elements form the business principle of Integrity. Clear communication and consistency between what we say and what we do is essential to building trust with our customers, employees and third parties. Conducting all our actions with Integrity is necessary to further TracFone's success.

Respect

Respect for our customers and for the information they place in our care, as well as respect for our fellow workers, is what sets TracFone apart from all other no-contract wireless providers. At TracFone, we treat every person with the care and respect they deserve and believe in an unwavering optimism of prosperity.

Accountability

We are responsible for upholding the Company's business principles and values in our individual actions and in the actions of TracFone as an organization. We aim to be regarded as a Company and group of individuals that strictly adhere to our business principles and the law, not only because of the potential impact due to fines and penalties but because of our corporate culture to follow the appropriate course of action mandated. It is equally important that we follow internal Company policies. All TracFone employees are tasked with doing the right thing even when no one is watching. Our work should reflect the great pride we have in our Company and should always be completed to the highest of standards of excellence and professionalism.





**Truth and honesty
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has built its
business.**



Diversity

Our strength as a Company draws on the diverse backgrounds, origins, and experiences of every employee. At TracFone, we embrace these differences and encourage an inclusive organization. This helps us to identify with and serve customers, as well as build strong relationships with our Business Partners.

Fiscal Responsibility

Every employee is responsible as a steward of the Company's assets and financial resources, ensuring that the use of Company assets advances the Company's goals. We should take care of our Company's financial resources and other assets as if they were our own.

People Development

As a Company, TracFone must ensure that its human assets are managed in a sensible manner so as not to waste the valuable talents of our employees. It is important to develop talented and empowered individuals who can contribute to the continued growth and development of all employees at TracFone.

Productivity

We must remain committed to the improvement, growth, quality and optimization of our people and our processes. Each employee must remain vigilant to maintain our standards and to ensure that Company resources, whether they are financial or human capital, are not wasted.

Social Awareness

TracFone is committed to being community oriented. This demands that the Company must contribute towards the sustained development of the communities that we have the privilege of serving.

PEOPLE AND PRIVACY

IN THIS SECTION:



PRIVACY



CUSTOMERS



EMPLOYEES



BUSINESS PARTNERS

People are a highly valued asset at TracFone. Customers, employees, contractors and our Business Partners must be treated with care and respect. Additionally, the information we obtain from our customers, employees, contractors or Business Partners is critically important and must be safeguarded and protected.

PRIVACY

Privacy is critical to the telecommunications industry. Multiple laws covering privacy require TracFone to protect our customers' data but more importantly, our customers place their trust in our ability to secure and protect their personal information.

The data or information that our customers send through their devices and onto the network is, in many cases, sensitive and personal. All of this data and information belong to the customer. TracFone is the custodian of this information and data and we must always keep it safe and follow the customer's instructions on whether it can be shared or disclosed to others.

The Company's Privacy Policy informs our customers on how we will treat each piece of their data and information. It sets the boundaries

for how the Company will control access to this information to anyone outside of TracFone. Every employee at TracFone is charged with ensuring that the Company strictly follows the Privacy Policy. TracFone's reputation rests on our ability to keep our customers' data and information secure. Further, each employee is responsible to report any improper use of customer information or security breach immediately so proper actions can be taken.

Employee information is also treated with the same level of privacy and sensitivity as customer data. Access to any employee's personal information is restricted to the Human Resources Department. Employees' personal information may not otherwise be accessed by employees without the authorization of the Human Resources Department pursuant to the Employee Handbook.

Key Points to Remember

- **Read TracFone's Privacy Policy and follow its requirements in all transactions that involve customer information and data.**
- **No voice, data, or other transmission may be accessed or interfered with without an authorized directive from senior management.**
- **No personal data may be collected by deceitful means.**
- **No conversation, data transmission or other type of communication involving our customers may be monitored or listened to, nor may contents of any communications be revealed unless required by a legal authority and approved by the Company's General Counsel.**
- **No employee or external party can use, whether for their own benefit or the benefit of a third party, any information derived from any communication involving our customers.**

WHERE YOU CAN GET MORE INFORMATION

- Non-Disclosure / Confidentiality / Work Product Policy (DynamicPolicy / Corporate Governance/ Ref. #: HR-0001)
- mHealth HIPAA Compliance Policy (DynamicPolicy / Legal & Carrier Relations / Ref. #: LGL-0004)
- Information Security Policies and Procedures (DynamicPolicy / Information Security / InfoSec-Issued Policies & Procedures / Information Security Policy and Procedures / End-User Computing Policy/ Ref. #: IT-SEC-0003)
- Information Security Policies and Procedures (DynamicPolicy / Information Security / InfoSec-Issued Policies & Procedures / Information Security Policy and Procedures / Ref. #: IT-SEC-0001)
- Privacy Policy (all brand main web pages)
- Employee Handbook (DynamicPolicy / Corporate Governance)

CUSTOMERS

TracFone's customers are the primary reason the Company is in business. Their satisfaction and the service we supply them must be at the highest level possible. Because we value every customer, it is every employee's responsibility to treat each customer with the highest level of courtesy and respect so we can retain their business and gain their confidence to draw new business to the Company.

Additionally, customers are protected by various consumer protection laws that safeguard consumers' rights and ensure that they are treated fairly by all companies.

Failure to meet these standards may draw the attention of the authorities and can result in financial losses imposed by the government. It can also cause harm to TracFone's reputation.

TracFone does not permit any form of improper commercial practices by its employees. It is never permitted to pressure customers into purchasing a product or service that they do not need or want. All of our communications about our products and services to our customers must be clear and accurately describe the product or service that the customer will be receiving.

Key Points to Remember

- Treat every customer with the greatest respect and consideration.
- Provide customers with the best products and services possible.
- Give all customers a level of service that exceeds their expectations and clearly addresses their issues or concerns.
- Ensure communications with customers are clear and accurate.

WHERE YOU CAN GET MORE INFORMATION

- Compliance Communication Policy (TCPA and CAN-SPAM)
(DynamicPolicy / Corporate Governance / Ref. #: LGL-0007)
- Employee Handbook
(DynamicPolicy / Corporate Governance / Introductory Statement / Ref. #: HR-0003)

EMPLOYEES

Employees are TracFone's most valuable asset and the Company is committed to maintaining a corporate environment marked by safe, professional and congenial working conditions with respect for the dignity of all employees. TracFone has many policies in place to ensure that employees can work in a safe and respectful environment. The Company respects and values the diversity of its employees and is committed to being an equal opportunity employer and will not tolerate any illegal discrimination or harassment of any kind. TracFone expects all employees to conduct their work and actions with the highest ethical standards and promptly report any violations of local laws or Company policy.

Leadership

Individuals who are in positions of leadership are responsible for the results of their department as well as for contribution to the overall success of TracFone. Leadership, however, is more than just managing the daily tasks of employees. Leaders are responsible to lead by example, uphold the business principles of the Company and provide growth opportunities to employees. They are responsible to not only lead and support the members of their individual teams, but also to be a leader and role model to all TracFone employees. These individuals have been placed in these roles with the responsibility to provide guidance and encourage teamwork across the entire Company.

Equal Employment Opportunity

TracFone is an equal opportunity employer. All decisions concerning the employment relationship will be made without regard to age, race, color, religion, creed, sex, sexual orientation, national origin, marital status, veteran status, the presence of any physical or mental disability, or any other status or characteristic protected by federal, state, or local law. Discrimination or harassment will not be tolerated as it goes against our core Company values and may violate federal, state, and local law.



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Harassment, Threats and Violence

TracFone does not tolerate any form of harassment, threats, or violence in the work place. All forms of violence and harassment are prohibited, not just those that are specifically unlawful. Harassment can include any behavior that is humiliating, hostile or unduly intimidating. Accordingly, all actions and communications, including those relating directly or indirectly to the age, citizenship, nationality, race, color, disability, pregnancy, religion, gender, sexual orientation or political affiliation of any individual, must be free of any discriminatory, threatening, offensive, deceptive or defamatory content, or sexual or any other form of harassment. To maintain a safe and reliable working environment, physical violence and threats in the workplace must be reported and addressed immediately in accordance with established policies and procedures. Weapons are not permitted inside any TracFone facility.

Drugs and Alcohol

It is TracFone's desire to provide a drug-free, healthful, and safe workplace. Therefore, while on TracFone premises, no employee may use, possess, distribute, sell, or be under the influence of alcohol or illegal drugs. For employees conducting business-related activities off TracFone premises where alcohol may be served, it is the employee's responsibility to always act responsibly and avoid becoming intoxicated. Under no circumstances should any employee operate a vehicle or any equipment if there is any impairment due to the consumption of alcohol or prescribed medications.

Key Points to Remember

- Understand the Company's value of diversity and use it to guide you in your treatment of others.
- Only base decisions regarding hiring, promotion, development, discipline, compensation, and termination of employees on qualifications, merit and performance.
- Treat others with respect and avoid situations that may be perceived as inappropriate.
- Do not physically or verbally intimidate or humiliate others.
- Do not make inappropriate jokes or comments.
- Report any instances of discrimination or harassment to management or the Ethics Hotline, even if the harassment or discrimination is not directed at you.
- The use, sale, possession or distribution of any illegal drugs by any TracFone employee is strictly prohibited.
- Weapons are not permitted inside any TracFone facility.

WHERE YOU CAN GET MORE INFORMATION

- Employee Handbook
(DynamicPolicy / Corporate Governance / Employee Handbook - Ref. #: HR-0003)

BUSINESS PARTNERS

Our contractors, vendors and suppliers are valued Business Partners. Relationships with our Business Partners should be professional. TracFone should always be fair and reasonable in contract negotiations while at the same time striving to obtain the highest quality product or service at a favorable price. Only those Business Partners who best meet the needs of TracFone should be selected. All transactions with Business Partners shall be carried out in compliance with our established procedures, and all invoices and related documents must comply with applicable legal and internal requirements.

Additionally, TracFone's commitment to conducting business ethically and legally means that we expect the same commitment from our Business Partners. All Business Partners are expected to comply with all laws when conducting business especially in those transactions where they are acting on behalf of or representing TracFone. Each Business Partner shall be provided with TracFone's Code of Conduct and commit to following all the principles within the Code without exception.

Key Points to Remember

- **TracFone's Code of Conduct applies to all Business Partners.**
- **TracFone expects all Business Partners to carry out business ethically and legally.**



WHERE YOU CAN GET MORE INFORMATION

- América Móvil – Annual Sustainability Report.
www.americamovil.com/about-us/sustainability

COMPLIANCE AND CONFLICTS

IN THIS SECTION:



CONFLICTS OF
INTEREST



BRIBERY AND
CORRUPTION



GIFTS



INSIDER
TRADING



DOMESTIC AND
INTERNATIONAL
TRADE

The Company's ethical standards require honesty, professionalism, and fair dealing. We rely on these standards to gain the trust and admiration of customers and our peers and will not seek competitive advantage through unethical or illegal business practices. TracFone requires and encourages compliance with the "spirit" as well as the "letter" of the law. Even the appearance of illegal, dishonest or inappropriate behavior could have a negative impact on the Company and its employees.

Employees are expected to respect and comply with all applicable laws, rules, regulations, policies, guidelines and procedures that apply to the Company. Employees should familiarize themselves with the legal standards and restrictions applicable to their assigned duties and responsibilities.

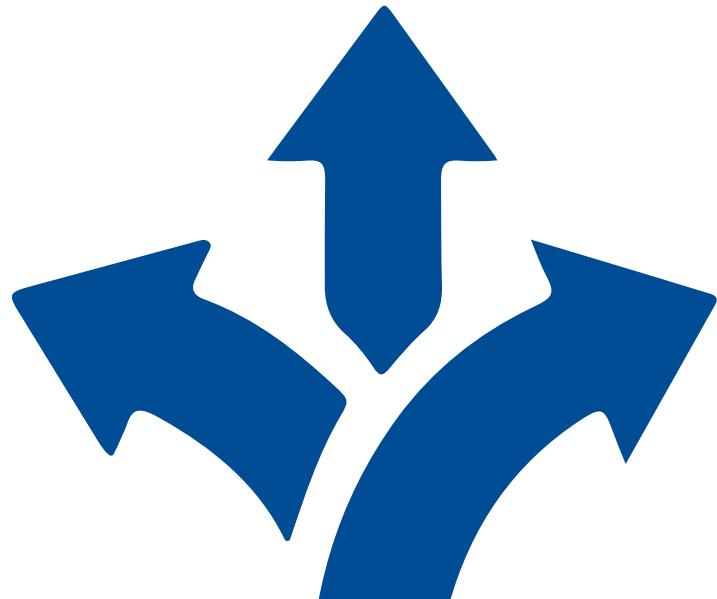
CONFLICTS OF INTEREST

A “conflict of interest” exists when an individual’s personal interests could interfere or appear to interfere in any way with the individual’s duties to the Company or the interests of the Company. A conflict situation can arise when an employee takes actions or has interests that may make it difficult to perform his or her work objectively and effectively. Conflicts of interest also arise when an employee, or a member of his or her family, receives improper personal benefits as a result of his or her position in the Company.

Each employee has a responsibility to TracFone, its shareholders and each other. Although this duty does not prevent any employee from engaging in personal transactions and investments, it does demand that each employee avoid situations where a conflict of interest might occur or appear to occur. All employees must always strive to avoid even the appearance of impropriety.

Key Points to Remember

- **Maintain high standards of ethics to properly reflect honesty, transparency, and integrity in your actions with the Company.**
- **Report any outside business interests or outside director positions to your immediate manager.**



WHERE YOU CAN GET MORE INFORMATION

- Employee Handbook (DynamicPolicy / Corporate Governance / Ref. #: HR-0003 / Section 108)

BRIBERY AND CORRUPTION

Bribery occurs when someone offers, pays, seeks or accepts a payment, gift, favor, or anything of value to improperly influence a business transaction. Bribery can involve government officials or commercial parties. Bribes do not have to be directly paid or promised by a company but can be given by a third party acting on the company's behalf, making that company liable for the bribery even if the company does not directly authorize the activity. **Offering or accepting bribes of any kind is never permitted at TracFone.**

The U.S. Foreign Corrupt Practices Act (the "FCPA") includes limitations on relationships with foreign government officials with whom we may interact in our business affairs. The FCPA prohibits, among other things, offering, promising or making a payment to obtain a lower tax rate, a license, a concession, a permit,

or other similar governmental approval. The definition of a government official is extremely broad and can include individuals who are elected or appointed to public office. However, the definition may also include family members of a government official or employees of an agency that is fully or partially owned or operated by the Government. Whenever gifts are contemplated for any foreign person, the Legal Department should be consulted.

Indirect Payments

Any payment to a government official by a third party retained by TracFone may be deemed to be a payment made directly by TracFone if we knew or had reasonable grounds to believe that the third party was making the payment. Therefore, TracFone may be found liable for making improper payments even if we did not expressly authorize it.

Key Points to Remember

- Do not offer, promise, make, or accept a payment, gift, or favor in return for favorable treatment or to gain a business advantage.
- Ensure that people you work with, including Business Partners, understand that TracFone does not permit bribes in any form.
- Report any request that is made, or even implied, for a bribe or kickback, even if the bribe or kickback is not completed and no money or other item of value is exchanged.
- Never provide any government official, their family member, or any individual who may be an employee of a state owned company or a candidate for a public office with any gift or item of value without first consulting with the Legal Department.

WHERE YOU CAN GET MORE INFORMATION

- Anti-Corruption Policy (DynamicPolicy / Corporate Governance / Ref. # : LGL-0009)

GIFTS

It is not unusual for individuals or companies to exchange small, appropriate gifts or provide entertainment to develop and maintain business relationships. It is not appropriate for an employee to allow any personal items received to influence a decision about retaining or maintaining a business relationship with an external company. It is also not appropriate to use gifts or travel and entertainment to influence others including public officials to enter into, maintain, or expand business relationships with TracFone.

Never accept gifts, loans or any other favors from anyone who is doing business with TracFone or who wishes to do business with TracFone. The only exceptions are financially immaterial gifts having a value of \$75 or less, or those approved by the Company's Chief América Móvil Coordinating Officer and Executive Cost Center Owner.

All gifts, lodging, travel, entertainment, and/or meal expenses intended for a government official, to the extent not prohibited by the laws of the applicable country and regardless of value, must be reviewed and pre-approved in writing by our Legal Department before they are offered to the government official.



**Never accept
gifts, loans or
any other favors
from anyone who
is doing business
with TracFone or
who wishes to
do business with
TracFone.**



Key Points to Remember

- Never accept expensive or inappropriate gifts from any Business Partner.
- Gifts valued above \$75 require advance approval.

WHERE YOU CAN GET MORE INFORMATION

- Employee Handbook (DynamicPolicy / Corporate Governance / Ref. #: HR-0003 / Section 108)
- Anti-Corruption Policy (DynamicPolicy / Corporate Governance / Ref. #: LGL-0009)

INSIDER TRADING

TracFone is not a publicly traded company. However, TracFone employees are still subject to insider trading laws of the U.S. and Mexico since TracFone's parent company, América Móvil, is a Mexico based company that is publicly traded in Mexico and in the U.S. Because TracFone employees may have access to information that is not publicly known that could affect the price of América Móvil's share price, TracFone employees are subject to the regulatory requirements on trading of securities issued by América Móvil.

Insider trading laws prohibit any person who is a Related Party, in possession of, or who may have access to Inside Information concerning América Móvil, from trading in the securities issued by América Móvil and/or any derivative or other instrument whose underlying assets are such securities. As broadly defined by insider trading laws, a Related Party includes officers and directors of América Móvil and its subsidiaries, employees and their relatives, agents and external auditors.

Employees who possess Inside Information or knowledge of any relevant event, fact or circumstance of any nature whatsoever concerning América Móvil that has not been publicly disclosed and that may influence the price of the securities issued by América Móvil, must follow América Móvil's restrictions on communicating restricted information or trading any of its financial instruments.

Insider trading regulations provide that any person who is deemed to have access to

Inside Information is prohibited from buying, whether directly or indirectly, any securities of the company issuing those securities to whom the buyer may be considered a Related Party. This restriction remains in place for three (3) months after a Related Party's most recent sell transaction in the securities issued by América Móvil. This same three (3) month prohibition also applies to the buying of América Móvil securities by a person considered to be a Related Party with the prohibition period starting on the date of a Related Party's last purchase transaction in América Móvil securities.

América Móvil has identified a "window" or period during which Related Parties may trade in América Móvil's securities. América Móvil believes it is appropriate for Related Parties to trade in its securities during the period from the fifth (5th) through the twentieth (20th) calendar day following the release of each quarterly report. After this time, América Móvil's management has made every effort to ensure that all material information, including financial information, has been publicly disclosed.

Additionally, América Móvil has determined a "black out" period when Related Parties must refrain from trading in América Móvil's securities. The blackout period begins fifteen (15) calendar days prior to any meeting of América Móvil's Board of Directors and ends on the eighth (8th) calendar day after such board meeting concludes or on the date on which all material information has been publicly disclosed, whichever is earlier.

Key Points to Remember

- América Móvil is a publicly traded company and TracFone is its wholly owned subsidiary.
- TracFone employees must be careful not to violate insider trading laws.
- Violations of insider trading laws can be criminal and punishable with fines and prison time.
- Insider trading regulations are complex and difficult to understand. When in doubt, contact the Legal Department for information regarding trading restrictions.

WHERE YOU CAN GET MORE INFORMATION

- América Móvil Memo: Recommendations Regarding Privileged Information and Compliance with Applicable Laws (DynamicPolicy / América Móvil)

DOMESTIC AND INTERNATIONAL TRADE

Competition - Domestic Trade/Anti-Trust

Most countries have well-developed bodies of law designed to encourage and protect free and fair competition. These laws often regulate TracFone's relationships with its distributors and dealers, including pricing practices, discounting, credit terms, promotional allowances, exclusive dealerships or distributorships, restrictions on carrying competing products, and many other trade practices.

Antitrust laws are in place to protect those who compete fairly and punish those who do not. Therefore, TracFone must

fully understand these laws in order to ensure compliance and avoid even the appearance of unlawful activity, because the violation of antitrust laws has severe consequences. TracFone is committed to obeying both the letter and spirit of these laws. The consequences of not doing so can be severe for all of us. Although the spirit of these laws, known as "antitrust", "competition", or "consumer protection" laws, is straightforward, their application to particular situations can be quite complex. To ensure that TracFone complies fully with these laws, each of us must have a basic knowledge of them and must involve the Company's Legal Department early on when questionable situations arise.



Scrutiny and Due Diligence

TracFone must scrutinize the conduct of third parties we retain, including any consultant, lobbyist, contractor and/or agent, to ensure that they fully comply with applicable laws and maintain the highest ethical standards. We must take special care with any Business Partner who may interact with government officials on our behalf. TracFone must always receive appropriate documentation or receipts before making any payments to Business Partners or third parties. Requests for payments of unusual or excessive expenses shall promptly be referred to the Legal Department.

TracFone will not establish a relationship with a Business Partner or any third party that may interact with government officials on our behalf until we have completed the following:

- Conduct sufficient due diligence on the Business Partner such that TracFone can determine that the Business Partner (1) if an entity, is not owned in whole or in part by a government official and does not have directors, officers, or employees who are government officials, (2) if an individual, is not a government official, and (3) is not likely to engage in any improper conduct that would expose TracFone to liability or reputational damage.

- Execute a written contract with proper anti-corruption provisions, including an obligation to comply with TracFone's policies and Code of Conduct.

Sanctions - International Trade

Because the U.S. government may also impose restrictions on the parties with which U.S. companies may engage in business, TracFone must conduct the proper due diligence on its Business Partners to ensure that they are not listed on any of the U.S. government's sanctioned or denied parties lists. These lists may include both domestic and international companies.

Key Points to Remember

- When contacting or attending meetings where competitors are present, avoid topics like pricing, terms and conditions of sales, customer and supplier relationships or agreements.
- Industry and Trade Association meetings are beneficial for the Company to attend but they can create opportunities of heightened risk and employees should limit discussions to approved meeting objectives.
- Any information received regarding competitor pricing, cost or sales information, or contract terms with a common supplier should be turned over to the Legal Department immediately and all copies destroyed.

WHERE YOU CAN GET MORE INFORMATION

- América Móvil - Annual Sustainability Report. www.americamovil.com/about-us/sustainability
- Supplier Management Policy and Procedures (DynamicPolicy / Corporate Procurement / Ref. # SM-0001)

PROTECTION OF COMPANY ASSETS

IN THIS SECTION:



COMPANY ASSETS



RECORDS MANAGEMENT



IT SYSTEMS

Corporate assets can be physical or intangible. They can include buildings, machinery, office equipment and information technology (“IT”), among others. They can also include intellectual property, trade secrets and key business processes. Collectively these assets help TracFone operate efficiently and compete in the market place. Protecting these assets and ensuring their appropriate use is the responsibility of every employee. Company assets are intended to be used solely in the performance of our professional duties. Employees are expected to adhere to all applicable operating, administrative and security procedures, and to avoid engaging in any behavior that may result in the loss, damage, destruction, theft or waste of Company assets.

COMPANY ASSETS

General

Our assets are comprised of all real property, furniture, tools, materials, vehicles, inventories, hardware and software applications such as email and voice-mail, internally developed software, financial resources, and other authorizations to operate telecommunications networks.

Additionally TracFone has intangible assets such as intellectual property rights, information about our products and services, and financial and business data. These are all necessary to carry out our activities and operations.

Protecting and ensuring the adequate use of our assets and services is critical for TracFone's continued success. It is every employee's responsibility to use Company assets only for completing work related activities and strictly adhere to all applicable operating, administrative and security procedures. Company assets should not be used for personal or unauthorized purposes, including making unauthorized calls or data transfers. Company assets may only be sold, donated, or transferred by authorized individuals at TracFone who must follow established procedures.

Financial Resources

Employees who have direct responsibility and control over the Company's financial resources, including cash and cash equivalents, securities, credit instruments, and credit cards, are personally responsible for their safekeeping and for ensuring that all the funds are used for their intended purposes. All Company records must accurately reflect all revenue and expenditures and must have the appropriate documentation to support any expenses.

Confidential Information

All information used, obtained, produced or developed by our employees in the performance of their duties is the Company's property and must be kept confidential. This includes the information pertaining to our products, services, and rates as well as marketing information or strategy, whether developed internally or by a third party hired by TracFone. Any current and future business plans, as well as all financial and legal information pertaining to the decisions adopted by management, are confidential and should be considered a company asset.

Key Points to Remember

- TracFone values Company Assets and it is every employee's responsibility to exercise due care when dealing with Company Assets.
- Company Assets are intended to be used solely in the performance of our professional duties.
- Business information and strategy information must not be disclosed without prior management approval.

WHERE YOU CAN GET MORE INFORMATION

- Information Security Policies and Procedures
(DynamicPolicy / Information Security / InfoSec-Issued Policies & Procedures / Information Security Policy and Procedures / Ref #: IT-SEC-0001)
- Information Security Policies and Procedures
(DynamicPolicy / Information Security / InfoSec-Issued Policies & Procedures / Data Leakage Prevention and Data Classification Guidelines / IT-SEC-0004)

RECORDS MANAGEMENT

A record contains information that is proof of a business transaction or activity and may be required for legal, tax, or accounting purposes. Examples of records include contracts, budgets, non-disclosure agreements, material specifications, audit reports, permits, official meeting minutes and government declarations for environmental, health and safety or other purposes.

All records containing potentially valuable Company data must be managed properly. This includes the ability to quickly and reliably retrieve data for periods of time prescribed by various laws and regulations.

The Legal Department has worked with various departments to compile retention requirements for most records and has documented the requirements in the Electronic Mail and Records Retention and Destruction Policy & Procedure. Record custodians within each department are expected to retain records according to the retention policy or local regulation, whichever is longer.

Key Points to Remember

- All records subject to retention period imposed by state or federal law or regulations are retained for at least the minimum period as required by applicable state or federal law or regulations.
- Adequate records are developed and maintained to document the Company's compliance with all relevant laws.
- All records that otherwise have value to the Company are retained for a period of time that will reasonably assure the availability of those records when needed.

WHERE YOU CAN GET MORE INFORMATION

- Electronic Mail and Record Retention and Destruction Policy & Procedures
(DynamicPolicy / Corporate Governance / Ref. #: LGL-0002)

IT SYSTEMS

Our IT systems are critical for our day-to-day operations. The Company has developed software internally or acquired the requisite licenses to use all the software installed in its systems. Accordingly, all rights to such software are the Company's sole and exclusive property.

We have adopted security measures to protect our networks, IT systems and electronic information. Each of us is individually responsible for protecting our Company's IT systems and the information stored in them, and for knowing and complying with the policies and guidelines concerning their use.

Technology will continue to evolve and will impact how and where people work. Along with the improvements that this evolution may bring come new challenges for ensuring Company data is always safe and secure. Employees must always exercise good judgment, reasonable discretion, and extreme caution when handling all information contained in electronic files, especially when they are handling information while away from their office.

 **Each of us is individually responsible for protecting our Company's IT systems and the information stored in them.** 

Key Points to Remember

- Our IT systems are critical for our day-to-day operations.
- All hardware and software, as well as all access to and processing and storage of data, must be adequately safeguarded and used solely for authorized purposes.
- All employees must refrain from engaging in any attempt to circumvent the security protocols for the Company's systems.
- Storing the Company's confidential information in personal computers, including any type of storage medium not owned by the Company, is prohibited.
- If you are in doubt about a particular question related to our IT Systems and security measures, contact the Information Security or IT Departments.

WHERE YOU CAN GET MORE INFORMATION

- Information Security Policies and Procedures
(DynamicPolicy / Information Security / InfoSec-Issued Policies & Procedures / Ref #: IT-SEC-0001)
- Information Security Policies and Procedures
(DynamicPolicy / Information Security / End-User Computing Policy/ Ref. #: IT-SEC-0003)

COMMUNICATIONS AND COMMUNITY RELATIONS

IN THIS SECTION:



MEDIA RELATIONS



POLITICAL ACTIVITIES

MEDIA RELATIONS

Whether communications are on Company email or on social media, your communications can be a direct reflection on TracFone. Improper or inaccurate information can harm the Company's reputation and negatively impact TracFone's ability to conduct business. To ensure that all information distributed to the media is in agreement with Company objectives, all media and promotional requests must be routed to the Public Relations team within the Marketing Department. This team is the only group that is authorized to communicate publicly on TracFone's behalf.

Key Points to Remember

- Always refer any external request for information to your management or the Public Relations team within the Marketing Department.
- Use caution when using social media to ensure that your comments are not misinterpreted as being the official position of TracFone.



WHERE YOU CAN GET MORE INFORMATION

- Employee Handbook (DynamicPolicy / Corporate Governance / Ref. #: HR-0003, Section 515)
- Social Media Policy (DynamicPolicy / Marketing / Digital Marketing and E-Commerce / Ref. #: ECO:0001)

POLITICAL ACTIVITIES

TracFone has no ideological or political affiliation whatsoever, but respects its employees' right to participate in not-for-profit professional associations and citizens' organizations devoted to the promotion of the lawful and responsible exercise of political rights. At TracFone, all employees are entitled to exercise their political rights without being pressured, directly or indirectly, to favor any given political party or candidate. However, in order to ensure that we comply at all times with the laws to which we are subject, any such political activity must be undertaken solely on a personal basis, during non-business hours and without making any express or implied reference to TracFone, and may under no circumstance involve the use of any of TracFone's financial or other resources or assets.

At TracFone, all employees are entitled to exercise their political rights without being pressured, directly or indirectly.

Key Points to Remember

- TracFone has no ideological or political affiliation whatsoever.
- All employees are entitled to exercise their political rights.
- However, any such political activity must be undertaken solely on a personal basis, during non-business hours and without making any express or implied reference to TracFone.

WHERE YOU CAN GET MORE INFORMATION

- Employee Handbook (DynamicPolicy / Corporate Governance / Ref. #: HR-0003, Section 515)
- Anti-Corruption Policy (DynamicPolicy / Corporate Governance / Ref. #: LGL-0009)

EMPLOYEE CREDITS

Design

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Editorial Review

Sharyn Zimmerman - Sr. Manager, IT SOX Compliance & Policy Administrator

Michael McGovern - VP Internal Audit

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