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Code of Ethics

Public Release January 2026

A Message from our CEO

At Axtel, we carry ourselves with integrity, responsibility and respect. This Code of Ethics establishes the principles that govern our decisionmaking and behavior towards our employees, clients, suppliers, authorities, shareholders and the broader community, strengthening the reliability and sustainability of our company.

Objective, Validity and Reach of our Code

- Stipulates the ethical principles and behavioral guidelines that shape Axtel
- This Code applies to all personnel, executives, board members, consultants, contractors and third parties that act in representation of the company.
- It is **valid indefinitely** and its compliance and enforcement is mandatory.

Our Philosophy

- **Mision:** To transform organizations with connectivity and digitalization solutions for their sustainable development.
- **Vision:** To be the best choice for our clients, in their digital experience, through innovation and value creation.
- **Purpose:** **Technology that connects your life.**

Our Principles

We who work at Axtel, **accept, promote and adhere** to the following principles:

- **Commitment:** Delivering on our word to build trust.
- **Awareness:** Acting with purpose aligned with the business strategy.
- **Efficiency:** Optimizing our work through agility and innovation.
- **Human Leadership:** Influencing from a Holistic Well-Being Perspective.

Ethical Conduct and Compliance

- We comply with all **applicable legislation** including telecommunications, labor, competition, data protection, environmental, and stock market laws and regulations.
- Compliance with **internal corporate policies and directives** and the Employee Handbook.

Conflicts of Interests

We avoid to the utmost extent all incidents that may compromise our objectivity and decisionmaking or engender undue personal benefits.

All employees sign an annual declaration of conflicts of interests form.

Anticorruption and Zero Tolerance Policy

- We prohibit bribery, illegal commissions, undue gifts and political contributions.
- All relationships or connections with authorities, clients and suppliers are distinguished by **integrity, transparency and absolute compliance with legislations.**

Human Rights, People and the Workplace Environment

- We respect and promote **Human Rights**, diversity and equal opportunities.
- Zero tolerance against **discrimination, harrassement or workplace violence.**
- We promote a **healthy, dignified and safe** working environment.

Responsible Usage of Information and Assets

- We protect all physical, technological and financial assets of the company.
- We safeguard **confidential information and personal data** according to applicable legislation and internal data protection policies.

Relationship with Stakeholders and Concerned Parties:

- **Clients:** Veracity, quality and continuity of within all of our services.
- **Suppliers:** Transparent, ethical and responsible supplier screening and selection.
- **Competition:** Fair competition strategies.
- **Community:** Virtuosity in our day-to-day approach towards the broader community.

Sustainability (Environmental Social Governance) Strategy:

Axtel integrates sustainability into its business model through:

- **Social Responsibility:** Workplace wellbeing, inclusivity and social development.
- **Environment:** Efficient resource management and reduction of environmental impacts.
- **Governance:** Accountability, transparency and regulatory compliance.

Donations are exclusively carried out in an ethical manner, following legal criteria and solely under institutional approval.

Reporting Channel-Transparency Mailbox

We employ a fully confidential and retaliation free Transparency Helpline mechanism called the **Transparency Mailbox** to facilitate the reporting of:

- Failure to comply with the aforementioned Code of Ethics.
- Conflicts of interest, corruption or fraud.
- Financial or Internal control irregularities

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Repercussions on account of Failure to Comply

Any violations to this Code could result in **disciplinary measures**, proportionate to the severity of the violations and applicable legislation.