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Comprehensive Risk Management Policy

January 2026

Objective

At Axtel, we recognize that proper risk management is a fundamental element for creating and protecting value, achieving strategic objectives, strengthening operational resilience, and fulfilling our responsibilities to customers, investors, employees, suppliers, and other stakeholders.

This Policy is intended to establish the principles governing the identification, assessment, mitigation, monitoring, and reporting of risks that may affect the achievement of strategic, operational, financial, regulatory, environmental, social, and corporate governance (ESG) objectives.

Scope

This Policy applies to all people who work at Axtel, as well as to its subsidiaries and business units, within activities related to enterprise risk management.

Principles

Risk management at Axtel is based on the following principles:

- Integration of risk management into strategic and operational decision-making.
- Proactive identification of risks and opportunities.
- Systematic assessment of the likelihood and impact of risks.
- Implementation of controls and mitigation actions proportional to the level of exposure.
- Ongoing monitoring and review of control effectiveness.
- Transparency and accountability in risk management.
- Consideration of environmental, social, and corporate governance factors within the risk assessment process.
- Continuous improvement of the risk management system.

Governance and Responsibilities

Board of Directors and Supporting Committees

They are responsible for overseeing the effectiveness of the risk management system and ensuring that relevant risks are considered within the corporate strategy.

Chief Executive Office and Executive Divisions

They are responsible for:

- Identifying and assessing the risks associated with their processes and activities.
- Promoting actions to mitigate identified risks.
- Allocating resources for the implementation of controls.
- Following up on the status of risks under their responsibility.

Internal Control Area

It is responsible for:

- Coordinating the corporate risk management process.
- Keeping the Corporate Risk Matrix up to date.
- Facilitating risk assessment with the responsible areas.
- Assessing the existence and effectiveness of controls.
- Periodically reporting results to Senior Management.

Organization Personnel

Everyone who works at Axtel is responsible for identifying, communicating, and contributing to the management of risks related to their activities.

Risk Management

Axtel maintains a formal risk management process that considers, at minimum, the following stages:

a) Risk Identification
Risks are identified through periodic reviews of processes, regulatory changes, strategic projects, market conditions, technology matters, ESG risks, and relevant internal or external events.

b) Assessment and Prioritization
Risks are assessed considering:

- Likelihood of occurrence.
- Financial impact.
- Operational impact.
- Reputational impact.

- Regulatory and compliance impact.
- Environmental and social impact.

The combination of these factors makes it possible to determine the level of risk exposure and establish priorities for action.

c) Mitigation and Control
For each significant risk, controls, monitoring mechanisms, and action plans will be defined to reduce its likelihood of occurrence or minimize its consequences.

d) Monitoring and Follow-up
Risks and controls will be reviewed periodically to evaluate their relevance, effectiveness, and alignment with the business environment and corporate strategy.

e) Reporting
The results of risk assessments, as well as the corresponding mitigation plans, will be reported to Senior Management and the appropriate governing bodies.

ESG Risks

Axtel maintains an Environmental and Social Management System (ESMS) that forms part of its comprehensive risk management system. Through this system, environmental and social risks and impacts associated with operations, the value chain, and stakeholders are identified, assessed, and managed. The ESMS results are integrated into the corporate risk assessment process, facilitating the definition of controls, mitigation plans, monitoring indicators, and reporting mechanisms for Senior Management, thereby strengthening organizational resilience and sustainable value creation.

Assessment of risks related to:

Environmental
- Climate change.
- Energy consumption.
- Waste management.
- Extreme weather events.

Social
- Occupational health and safety.
- Human rights.
- Diversity, equity, and inclusion.
- Talent attraction and retention.
- Cybersecurity and data privacy.

Corporate Governance
- Business ethics and integrity.
- Corruption and bribery.
- Regulatory compliance.
- Conflicts of interest.
- Information security.

Policy Review

This Policy will be reviewed at least once a year or whenever there are significant changes in the organization's strategy, organizational structure, regulatory environment, or risk profile.

Publication

This Policy is public in nature and is available to internal and external stakeholders through the corporate channels established by Axtel.