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Responsible Artificial Intelligence Policy

January 2026

Objective

At Axtel, we recognize that Artificial Intelligence (AI) represents an opportunity to drive innovation, operational efficiency, and value creation for our customers, employees, shareholders, and other stakeholders. We also recognize the responsibility to develop, acquire, implement, and use artificial intelligence technologies in an ethical, secure, transparent manner aligned with our corporate values.

This Policy establishes the principles that guide the responsible use of Artificial Intelligence at Axtel, promoting the appropriate management of risks and opportunities associated with these technologies.

Scope

This Policy applies to:

- All individuals working at Axtel.
- Suppliers, business partners, and third parties that develop, implement, or manage AI solutions for the organization.
- Systems, tools, or applications that incorporate artificial intelligence capabilities, including generative artificial intelligence.

Principles of Responsible Artificial Intelligence

Ethical and Responsible Use

Artificial Intelligence must be used in a manner consistent with Axtel's values of integrity, respect, transparency, and accountability.

AI solutions must not be used for purposes that violate applicable laws, human rights, or the organization's ethical principles. [Política I...Responsible | Word]

a) Human Oversight

Relevant decisions that may generate significant impacts on individuals, customers, suppliers, critical processes, or the organization must be subject to appropriate

b) Human oversight and validation.

Artificial Intelligence complements human decision-making but does not replace individual accountability and responsibility.

c) Transparency

Axtel will promote the transparent use of Artificial Intelligence and will seek to ensure that users understand the purpose and scope of the tools being used whenever applicable.

Responsible areas must adequately document relevant use cases and associated risks.

d) Privacy and Data Protection

Any implementation of Artificial Intelligence must respect the principles of privacy and personal data protection established by applicable legislation and the organization's corporate policies.

Information used in AI tools must be managed in accordance with Axtel's classification, confidentiality, integrity, and availability requirements.

e) Information Security

The adoption of AI solutions must include appropriate security measures to protect information assets and reduce risks related to cybersecurity, unauthorized access, information manipulation, or improper use of data.

The management of risks associated with AI technologies will be carried out in accordance with Axtel's corporate risk management and information security framework.

f) Bias Mitigation and Non-Discrimination

Axtel will promote reasonable practices to identify, prevent, and reduce potential biases that could produce discriminatory, exclusionary, or unfair outcomes.

AI solutions must be used in a manner consistent with the principles of equal opportunity, inclusion, and respect for human rights.

g) Regulatory Compliance

The organization will seek to ensure that the development and use of Artificial Intelligence tools comply with applicable laws, contractual commitments, and relevant international best practices.

h) Accountability

Areas responsible for implementing or using AI solutions must assume responsibility for their use, outcomes, monitoring, and associated risk management.

Artificial Intelligence Risk Management

Axtel integrates the management of risks associated with Artificial Intelligence into its corporate risk management and information security framework. Risks associated with AI must be identified, assessed, monitored, and mitigated considering, among other aspects:

- Personal data protection
- Information security
- Cybersecurity
- Regulatory risks
- Reputational risks
- Algorithmic biases
- Impacts on individuals and stakeholders
- Operational continuity

The assessment of these risks will be conducted periodically and whenever significant changes occur in the systems or technologies used, in accordance with internal risk management processes.

Governance

Oversight of risks associated with Artificial Intelligence will form part of the organization's existing corporate risk management, information security, and compliance mechanisms.

Areas responsible for implementing AI solutions must establish appropriate monitoring mechanisms to ensure compliance with the principles set forth in this Policy.

Relationship with Sustainability

Axtel recognizes that the responsible use of Artificial Intelligence is an important element of corporate governance and digital sustainability.

Accordingly, the company promotes management practices that contribute to generating benefits for stakeholders, strengthening digital trust, fostering responsible innovation, and preventing negative impacts resulting from the improper use of these technologies.

Review

This Policy will be reviewed periodically to ensure alignment with technological, regulatory, and business developments, as well as with international best practices related to Responsible Artificial Intelligence.

Publication

This Policy is public in nature and may be made available to customers, investors, suppliers, employees, and other interested parties through the company's corporate communication channels.
