

CODE OF ETHICS

2022

AXTEL

axtel

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Management Team's Message

To all employees:

We are pleased to present Axtel's Code of Ethics, which establishes the basic guidelines governing relationships between work colleagues, customers, competitors, suppliers, government, shareholders and business partners.

It includes the principal guidelines and standards related to our values and ethical principles, upon which the organization is founded and which we must all observe and comply with when undertaking our work activities.

By acting in accordance with these standards, we reaffirm the values that sustain our company's philosophy and contribute to keeping Axtel's good name impeccable, by endorsing its image before our stakeholders.

You should carefully read this Code of Ethics carefully and sign the acceptance form, as proof that you know and understand the content and agree to comply with its guidelines.

Our Code of Ethics is subject to periodic reviews as a result of modifications in the laws, regulations, our commercial activity or in the business environment. All changes are authorized by the Management Committee and the Board of Directors.

General Management appoints the Executive Director of Human Capital as responsible for disseminating, supervising adherence, updating and reinforcing knowledge of this Code of Ethics. Likewise, for ensuring compliance and monitoring the controls to avoid inappropriate acts or conduct in all areas of the organization.

We invite you to make this Code of Ethics a living document starting today, sharing the responsibility of making Axtel a consistent, honest company that is respectful of values, legislation and all of us who work here.

Sincerely,

Management Team

Introduction

Axtel is a company that requires, for its growth and strengthening, all its employees to actively participate in the construction of its present, its evolution and its future.

This document indicates the main principles, based on our corporate philosophy that should be observed in our daily performance and decision-making.

Axtel expects each of its collaborators to act with the highest standards of personal and professional integrity, comply with the policies, procedures, guidelines and laws governing our operation and actively participate in spreading an ethical culture.

Our Code of Ethics was approved by the Board of Directors and Management Committee, and therefore it applies to the management team, leaders, managers, coordinators, collaborators, consultants, external staff (outsourcing), contractors and anyone who renders professional services to our company, regardless of their position or relationship with the company.

Validity and Objective

This Code of Ethics, published in February 2021, describes the expected ethical conduct of all employees, it is valid indefinitely and is based on our company's corporate philosophy.

Its objectives are:

- Establish ethical principles that guide employees' actions and behaviors by seeking a productive, respectful, and harmonious work environment.
- Define the conduct guidelines in the relationships with our stakeholders.

Why a Code of Ethics?

- It regulates criteria in acting and decision-making.
- It is a point of reference for employees.
- It is the foundation and complement of our business philosophy (Mission, Vision and Values).
- It is a mandatory observance guide for all.

Scope

This document is corporate in its scope, applies to all employees at any hierarchical level and its observance is general and mandatory. It does not grant any exclusion by virtue of hierarchy and requires everyone's participation and commitment for fulfillment, as well as for preventing, reporting and correcting any failure to comply and ensure the objectivity, impartiality and confidentiality of all personnel.

The application of and adherence to the principles established in this Code represent a right and an obligation. Each employee is responsible for their actions, no one can force them to commit

an act of non-compliance, therefore, the company reserves the right to apply the corresponding sanctions.

All personnel, at all hierarchical levels, express their commitment to read and comply with the provisions of the Code of Ethics by signing an annual letter and taking an online course at least once a year.

Organizational Philosophy

Mission

To enable organizations to become more productive through digitalization.

Vision

To be the best option in the digital experience through innovation to create value.

Values

Values are the foundation on which our actions are built and define the philosophy that guides dealings with our co-workers, customers, suppliers and business partners. They express who we are, how we behave and act, and contribute to the achievement of our goals.

- Collaboration. Our strength
 - We draw our strength from coordinated teamwork and constant communication to achieve a common goal.
- Respect. Our commitment
 - The most valuable element for us are people, which is why we foster personal and professional development from an inclusive and respectful environment.
- Customer focus. Our differentiator
 - We focus on achieving objectives that exceed our customers' expectations, seeking their permanent satisfaction to establish long-term relationships.
- Innovation. Our passion
 - Our passion is innovation, we are constantly looking for new ways of doing things, always thinking ahead and ensuring simplicity and agility as priorities.
- Integrity. Our pillar
 - Our operation is based on the transparency of all our actions and on building relationships of trust, to generate a permanent commitment to society and contribute to its strengthening.

Personnel Responsibilities

It is the responsibility of the Chief Executive Officer (CEO), with support of Executive Directors, to keep this Code of Ethics updated, as well as to communicate and disseminate it to all personnel.

It is each employee's responsibility:

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- Support, live and promote a culture in which ethical conduct prevails, in accordance with the principles and values here established.
 - Actively participate in the dissemination of this document, ensuring its compliance, suggesting amendments and/or reporting any failure or violation to the Transparency Mailbox.
 - Maintain the highest level of integrity and honesty in our daily work, so that our company and those who work for it receive the trust of customers, suppliers and other stakeholders.

Compliance with the Code of Ethics

Each employee of Axtel has a copy of the Code of Ethics, to affirm their commitment with the highest standards of integrity in interpersonal relationships; with customers, suppliers, business partners and the community where we live and work.

All personnel are obliged to comply with the guidelines established in the Code of Ethics. The Management Team must set an example in word and action, ensuring that its employees comply with these principles. It is therefore necessary:

- To communicate the importance of our Code of Ethics and the need adhere to it and to the policies instituted by Axtel.
- To verify that employees understand the values and provisions of this document and offer additional training when necessary.
- To monitor all activities within its organization and area of influence to detect, prevent and correct deviations.
- To report any deviations it considers beyond its control, that are repetitive in nature or in which it is not sure of what action to take, as well as those that due to their nature or impact, are deemed sensitive or serious.

Legislation Compliance

At Axtel we comply with all laws and regulations relating to our activity. We do not expose our company to fines, closures or loss of reputation for failure to comply with the corresponding legislation. The policies and procedures published on our Corporate Intranet indicate what those laws and regulations are, to facilitate compliance.

Those applicable to our company include:

- Federal Telecommunications and Broadcasting Law
- Federal Labor Law
- Federal Consumer Protection Law
- Federal Competition Law

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- Industrial Property Law
 - Federal Copyright Law
 - Federal Law on Protection of Personal Data Held by Private Parties
 - Stock Market Law
 - General Law on Environmental Protection
 - General Law on Climate Change
 - Mexican Official Standards

You can consult the legislation applicable to our company with the Legal and Regulatory Executive Office.

Compliance with Corporate Policies

All Axtel employees are required to acknowledge the Corporate Policies, Procedures, Dress Code and Internal Labor Regulation, whether or not they are related to the activities we perform.

Their compliance enables us to work effectively, keep the company at an optimal level of risk mitigation and encourage a respectful work environment.

The Code of Ethics is harmonized with Axtel's Labor Equality and Non-Discrimination Policy.

The Policies and Procedures, Dress Code and Internal Work Regulation are published on the Corporate Intranet.

Conflict of interest

Those working at Axtel share the responsibility for avoiding situations that could lead to conflicts of interests. We make business decisions seeking the greatest benefit for the company.

There is a conflict of interest when the personal situation of someone who, due to circumstances of their position, has at their disposal and under their responsibility, time, resources or information; it places them in a position where a decision they make on behalf of the company could benefit themselves and/or their family members in the present and/or future, in detriment of the company; or, when due to the relationship they may have with a third party, it prevents them from objectively fulfilling their responsibility, putting the organization at risk, by making improper use of their position, authority or influence.

That is, when we allow personal interests and relationships to hinder our judgement and ability to make decisions with integrity and honesty.

Situations that can be considered conflicts of interest:

- Granting favors using Axtel's resources that benefit an employee or their close relatives.
- Having relatives working for Axtel or in companies with which they execute any kind of transaction or that are competitors.
- Having a relative as a supplier of Axtel. Employees are not allowed to be suppliers of Axtel.
- Perform an additional job, with or without compensation, that is related to the company's

activities or line of business, that puts at risk the disclosure of classified, strategic and/or confidential information.

- Using company resources (printers, computer equipment, stationery) for personal purposes.
- Participating in or influence the business requirements, negotiations or decision processes with customers or suppliers with whom there is a family relationship.
- Having a family member as a subordinate or boss, in a similar position or any position that is part of the same process, to avoid the perception of favoritism or injustice at work.
- Report participation as a shareholder, director or any other business relationship with competing companies. Shareholders who have or intend to have a business relationship with the company are subject to the same procedures and conditions as the rest of our suppliers and customers.
- Using information for personal benefit or that of third parties, by selling it or making it available to interests different than those of the company.
- Using the name of a colleague without their consent to exploit their position or influence for personal benefit.

All employees should sign a Conflict of Interest declaration every year, to ensure their acknowledgement and commitment.

Any potential case of a conflict of interest will be analyzed and assessed by the Human Capital Executive Department. For further information, consult the Conflict of Interest Policy, published on the Corporate Intranet.

Anti-corruption, Bribery and Gifts

a) Bribes

When the case of an employee who is suffering or carrying out any kind of extortion and/or bribery is known or suspected, it must be reported to ALFA's Transparency Mailbox.

State and federal laws and regulations, as well as Axtel's internal guidelines defined in the PLCTO-01 Integrity Policy, PL-GOB-JR-01 Anti-Corruption Policy and the DR-AUD-05 No Gifts Directive, strictly prohibit offering, making, requesting or accepting gifts, gratuities, payments, donations, entertainment, money or something in exchange for favorable or advantageous treatment to customers, suppliers, business partners, authorities or government officials, which is classified as bribery.

Axtel has a policy of zero tolerance for situations or acts of bribery, corruption and/or extortion in all its forms, therefore the acceptance or request of gifts, gratuities or favors, or special attention to colleagues, customers or suppliers, with the exception of promotional items that meet the characteristics defined in the DR-AUD-05 No Gifts Directive guideline, is forbidden.

It is the responsibility of each collaborator to know and be familiar with these guidelines, to fully comply with them, as well as to report any case or suspicion of any kind of bribery and/or extortion suffered or observed, through ALFA's Transparency Mailbox, which operates in strict confidentiality and protects

employees who report from potential reprisals.

b) Illegal Commissions

An unlawful commission is anything of value given to a supplier, integrator or decision maker to obtain favorable treatment in the award of a commercial or government contract or sub-contract.

These actions are considered a lack of probity and honesty, could lead to the termination of the working relationship and, if applicable, legal and criminal actions.

When we act on behalf of Axtel, we do not award or authorize gratuities that contravene current regulations and the ethical principles contemplated in this Code.

Any suspicion of bribery and/or illegal commissions must be reported to ALFA's Transparency Mailbox.

c) Gifts and Attentions

Accepting a gift to obtain a business advantage constitutes a bribe or illegal commission. At no time does Axtel seek to gain customers or business based on gifts or payments. The strength of the brands, the quality of service and the commitment to customer satisfaction are the bestselling cards we have.

We do not accept or offer gifts, gratuities or donations, with the exception of promotional items that meet the characteristics defined in the DR-AUD-05 No Gifts Directive.

d) Breakfast, Lunch and Dinners

Axtel may offer its customers or suppliers routine meals as a courtesy in the normal course of business. When contemplating an event for customers, integrators or suppliers, that exceed what is established in the policy, it should be previously authorized by the respective Executive Office and/or Management Team.

Axtel employees can accept routine meals or other normal invitation means from customers and suppliers as a courtesy during the normal course of business, provided that their purpose is not to obtain favorable treatment and they are not systematic or continuous.

If any customer or supplier suggests an invitation beyond of what is considered normal, it should be authorized by the Executive Director.

e) Political Contributions

It is prohibited to use Axtel's funds or resources to undertake personal political activities or on behalf of the company, including contributions to political candidates or parties.

We do not request contributions for organizations of any kind, nor do we distribute religious or political material.

Work Ethics

Axtel promotes a work environment of respect, cordiality and integrity. It values every employee as an

important member of the team.

At all times and in all our activities, we proceed with rectitude in accordance with the laws, principles and moral standards of the communities in which we operate.

We are responsible for maintaining a safe and healthy workplace, minimizing risks, free from acts of intimidation or physical violence, drugs, alcohol and pornography.

We value the plurality derived from different opinions and, consequently, respect all forms of thought, action and association.

a) Recruitment of Personnel

The selection and hiring of personnel is based on a candidate's capacity, professional experience and level of identification with the company's values.

Anyone participating in this process must rely on the Personnel Recruitment, Selection and Hiring Policy along with this Code, performing the established procedure with respect and without creating false expectations for candidates.

b) Human Rights

Every person has the right to life, liberty, equality before the law and freedom of expression, as well as work, food, and the highest attainable level of health, education and social security.

These are the human rights that transcend laws and/or cultural traditions, and are inherent, inalienable, universal and indivisible.

Axtel respects the human rights of its employees, customers, suppliers, community and other interest groups, and promotes their compliance.

The respect, protection and recognition of human rights is essential for the principle of legality and the concepts of equity and social justice.

c) Equity and Diversity

We interact with work colleagues regardless of department or level, based on total respect, honesty and dignity, valuing people and the cultural differences existing between us.

Axtel fosters and promotes equity by encouraging equal opportunities for men and women in access to employment, working conditions, professional development, training and participation in decision-making processes.

d) Discrimination

We prohibit discrimination based on race, color, ethnic origin, language, religion, age, sex, pregnancy, disease, HIV, AIDS, gender, disability, political affiliation, sexual orientation or social condition; directly or against a person or group, including employees, customers, suppliers and shareholders.

e) Harassment

Based on respect for the person, we provide a work environment free from any harassing behaviors due to: racism, sexism, ethnic comments or jokes, sexual advances or inappropriate physical contact, gestures, photographs, jokes or statements of a sexual nature.

Harassment is defined as repetitive, hostile and unwanted behavior that offends, bothers, degrades, humiliates, shames, affects or insults the dignity or integrity of an employee and creates an unpleasant working environment.

This includes:

- Unnecessary physical contact such as touching, pinching, patting, or hitting.
- Display racist, sexist or sexual content photographs on posters, internet sites, email or mobile devices.
- Questions and observations about a person's sexual life.
- Write notes, emails or letters with suggestive or sexual content.
- Any other action that could be perceived as offensive.

The person that believes is being harassed, can report it through ALFA's Transparency Mailbox. Reports will be investigated in a timely and confidential manner.

f) Workplace harassment

Harassment at work or bullying limits the personal and professional development of employees, leads to an insecure mental state, reduces productivity and deteriorates the working environment.

Therefore, at Axtel we avoid:

- Shouting
- Threats
- Physical or verbal abuse
- Use of offensive jokes, profanity or obscene language
- Jokes or comments about an employee's condition or characteristics
- Offensive visual display
- Psychological pressure.

When it is necessary to draw attention to someone, it should be done respectfully and in private.

If an employee is the subject of illegal pressure in their work relationships, inside or outside the organization, they must immediately report it to the Human Resources Department, in the Human Capital Executive Division and to ALFA's Transparency Mailbox.

g) Drugs, Alcohol and Other Substances

The use, sale, possession, production and distribution of drugs, illegal pharmaceuticals or controlled substances is strictly prohibited, along with the consumption of alcohol during working hours, is strictly prohibited.

h) External Personnel (outsourcing)

Companies that supply external personnel (outsourcing) must comply with the guidelines established by the Federal Labor Law, grant all benefits stipulated by the legislation and respect the human rights of its workers.

Axtel commits to the prompt payment of stipulated fees to the service provider, so it can meet its obligations and comply with applicable legislation.

i) Interpersonal Relationships

When a sentimental relationship is established between two employees, they are not allowed to remain in the same department or division of work, especially if the hierarchical position is that of boss/subordinate. This is to avoid damaging to the work environment and discriminatory treatment of others.

Any relationships between employees that go beyond friendship are not permitted when one or both of them are married, but not with each other.

j) Activities outside work

As Axtel employees, we avoid any activity or conduct in our personal environment that may unfavorably affect the company's prestige and reputation.

Participation as a teacher or speaker in classes, seminars, conferences, social or community service related to the company's line of business, information, experiences, developments, among others, whether paid or not, must be authorized by the respective Executive Director and the Executive Director of Human Capital.

A conflict of interest may arise when an employee consistently performs personal activities during normal working hours which take precedence over fulfilling their responsibilities, as well as using company's resources to perform activities outside of work.

k) Safety and Hygiene

At Axtel we are committed to complying with the laws and regulations of Organizational Health, Safety and Hygiene, both internal, as well as those of a local, state and federal order.

- We must maintain an adequate clean and tidy environment at facilities, which contributes to safe practices and the elimination of conditions of risk at work.
- Individual acts and decisions should not reduce or limit safety conditions in our operations, nor put the health of internal, external staff or the community at risk.
- It is the responsibility and obligation of the personnel to be trained in the use of protection equipment provided by the company to perform their activities, as well as to use properly.
- Any activity, no matter how important, may only be performed when the appropriate safety measures have been complied with to ensure the physical integrity and health of employees.

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- We must maintain an appropriate, safe and healthy work environment since safety is everyone's responsibility.

Use of the Company's Assets

We are all responsible for safeguarding and using the company's assets and property correctly and efficiently, following the established procedures to prevent them from being lost, stolen or subjected to unauthorized use.

The Company's assets and property include:

- Time
- Cash, checks, wire transfers and credit cards
- Land and buildings
- Records
- Vehicles
- Equipment, including desktop computers and laptops, photocopiers, scanners, office and meeting room furniture, projectors, landlines, and cell phones
- Work tools
- Hardware and software
- Waste and obsolete electronic equipment
- All company's funds and properties

We protect the company's assets and property:

- By ensuring funds are used for legitimate business purposes
- By keeping correct and complete records of funds spent
- By using corporate credit cards solely for company's purposes
- By ensuring that computer and communication equipment and systems, as well as the data they contain, are protected against unauthorized access, use, modification, destruction or disclosure.
- By using trademarks in accordance with the company's instructions.
- By using telephones, email and the Internet solely for legitimate business purposes.

Misuse of the company's assets and resources can be considered theft or breach of trust and lead to termination of the employment relationship or legal action.

The loss, damage, misuse, theft, embezzlement or actual or presumed destruction of the company's funds or assets must be reported immediately in writing to the immediate boss and to the Security and General Services Departments, as well as to the Human Capital Executive Director, in order to review the compliance with the Policy of Collection due to Loss or Misuse of Fixed Assets.

Confidentiality of Information

Confidential information is considered information that is important for business management, is sensitive, has inherent value, or whose misuse could cause damage to the company and/or its members.

All employees must sign a letter of confidentiality in which they assume responsibility for the proper use of information.

Axtel reserves the right to decide whether the misuse of confidential and/or privileged information has criminal consequences beyond the disciplinary action established by the company.

Confidential information includes, but is not limited to:

Accounting information and financial projections; mergers, acquisitions, partnerships or expansion plans; transactions with securities or financing; business and operational policies and practices, judicial or administrative disputes; organizational changes, personnel information, customer data, written communications, information transmitted through the data network; infrastructure and technology; research and development of new products.

Each employee is responsible for the information they handle and must safeguard information classified as confidential, which must be eliminated once used, if printed, by following the procedures established by Security and General Services.

Personal data entrusted to Axtel by any entity is processed in strict compliance with the provisions of the Federal Law for the Protection of Data Held by Private Parties, making of public knowledge the Privacy Policy through the privacy notice on the website: <http://axtelcorp.mx/avisoprivacidad>

For further information you can consult the Data Security Policy, Guidelines on Personnel Responsibilities in Information Security and Guidelines on Data Classification and Use published on the Corporate Intranet.

Relationship with Groups of Interest

a) Shareholders and Investors

Axtel employees share the commitment and responsibility to generate value for the company so it is attractive to shareholders and investors, and to meet the goals and objectives derived from our corporate strategy.

b) Clients

- Our sales promotion and arguments must be free of false information regarding the availability, opportunity and/or quality of our products and services, as well as the terms of sale.
- Axtel selects its customers and/or markets based on business criteria/strategies, without establishing discriminatory differences of any kind, by treating them in a distinguished treatment

for its integrity, professionalism and spirit of service.

- At all times we communicate with customers truthfully and offer only what we can fully comply with.

We are committed to delivering the highest quality services that guarantee the continuity of our customers' business by offering state-of-the-art technology that helps them become more productive and efficient.

We take special care to preserve the reputation of service and integrity of our company and customers by avoiding offering our services to those who may put our reputation at risk.

c) Suppliers

We are committed to the search for long-term relationships and alliances with our suppliers.

We take special care in the selection process, including, but not limited to, pricing, quality, delivery capacity and service reputation and integrity, as well as their commitment to caring for the environment, complying with labor legislation, ethics and social responsibility.

Our relationships with suppliers must always be managed transparently and in accordance with established procedures to guarantee equal opportunities, respect and integrity.

d) Competitors

Improving our knowledge of the market in which we operate helps us understand and meet customer needs.

Employees do not get involved in conversations with the competition on prices, profit margins, costs, quotes, terms and conditions, sales territories, market participation and distribution practices.

Privileged and competitive information must never be obtained directly or indirectly through bribery, extortion, gifts or gratuities.

Axtel does not participate in any agreement that pretends to limit the free play of the markets it operates for the purpose of improving its competitive position.

We do not establish agreements between companies to manipulate the prices of the products or services we offer, nor do we promote commercial practices seeking to gain market and/or eliminate competitors.

e) Authorities and Government

It is Axtel's obligation to be familiar, respect and promote compliance with laws, regulations, standards and other applicable legal provisions.

It is strictly prohibited to promise, offer, pay, lend, give or transfer any company funds, assets or valuables to public officials or government employees involved in a decision-making process for the purchase of goods and services or products, which could be classified as bribery and punishable by Mexican laws.

All doubts concerning business conducted with state and federal government officials should be directed, through the Sales Management, to the Legal and Regulatory Executive Office.

f) Community

The conduct of Axtel's employees in their community should reflect the values we promote.

Any behavior, action or attitude that violates morality and good customs will not be tolerated, since we must maintain a respected and integral image of the company.

Marketing and Advertising

a) Marketing

We communicate clearly, accurately and truthfully, so that customers understand the terms and conditions of our agreements, including the scope and functionality of our products and services, as well as the prices and responsibilities contracted by both parties so they can make comparisons and informed decisions.

We avoid unfair, incomplete, confusing or misleading information so as not to negatively affect market growth and cause customers churn.

b) Advertising

It is illegal for advertising and promotional claims to be misleading or create false expectations regarding products or services, which is why we comply with current local, state and federal legislation.

Our advertising and other communications are prepared responsibly and are based on honesty, they describe our products accurately and objectively, essential elements to preserve our customers' trust.

We avoid the use of texts, audios or images that promote stereotypes concerning gender, race, religion, disability, interpersonal relations, ethnic groups, level of education or social status, or that violate the human rights of children, women, people with disability and other vulnerable groups.

These guidelines must be communicated to our marketing and advertising agencies and consultants, and their compliance must be verified.

c) Sponsorship

At Axtel we do not sponsor, directly or indirectly, any events or activities that promote violence or vulgarity, violates values or security of the society, family and person, or that transgress the guidelines established in this Code of Ethics.

For questions about which events can be considered candidates for sponsorship, consult the Office of the Executive Director of Human Capital.

Communication

a) Media Relations

The department authorized to provide information of Axtel to the media is the Department of Communication and PR, as well as its official spokespersons.

We offer immediate, honest, fair and impartial answers to any request for information, without favoring any group or person.

Request for information from a media received by any department or employee must be immediately sent to the Office of Corporate Communication and PR.

b) Labor Relationship

At Axtel we practice open and transparent communication with employees to promote unity, a sense of belonging and participation.

Individuals are at the center of our organizational culture and we provide them with information that is useful and relevant for their jobs, and their professional and personal experience.

At Axtel we are receptive to the ideas and suggestions of employees, respond to their complaints and demands in a timely manner, and acknowledge their achievements and results.

c) Social Media

All employees are ambassadors of our brands, which is why we watch what we say to avoid causing negative effects on our company's reputation.

We see Facebook, Twitter, LinkedIn, YouTube and other social networks as communication channels used for the promotion of our brands and strengthening of Axtel's reputation.

d) Financial Information

Accounting, financial and administrative systems must provide correct and timely reports of transactions involving company assets, accurately describe our operations without omission, concealment or falsification of data, and comply with current accounting principles.

We do not participate in activities that threaten the integrity of financial information, such as incentives for personal benefit, misrepresenting company goals to expand the stock market, achieving sales quotas, budget commitments or increasing revenues to meet investor expectations.

It is prohibited to amend or falsify documents, records or reports, as well as hide information that could alter financial records and affect the company.

Our company is listed on the Mexican Stock Exchange and international markets, therefore, it is subject to review or investigation by the National Banking and Securities Commission ("CNBV") and by other international Commissions.

Financial reporting is a strategic resource. We comply with the obligations to inform our groups of

interest in a timely, accurate and adequate manner about the company's results and relevant events, using the formats, means of communication and deadlines established by the authorities.

It is the responsibility of all Axtel's employees to promptly report to the ALFA Transparency Mailbox any situation that puts the company's present and future income at risk.

e) Information Used at External Forums

As part of our activities, and due to our trajectory and knowledge, we are often invited to participate in public events such as conferences, seminars and presentations, among others.

If an employee receives an invitation to act as an exhibitor or representative of Axtel, they must notify their immediate superior, their Executive Director and the Office of Communication, who will review the relevance of the participation and authorize the content of the presentation or intervention.

The departments responsible for supervising the work of third parties (external parties such as suppliers, partners or consultants) must ensure these parties sign and comply with the provisions established in the company's letter of confidentiality and only use Axtel's information or speak on the company's behalf with the prior authorization of the Office of Communication.

Sustainability

a) Social Responsibility

Since Axtel is a socially responsible company, it offers its employees a respectful, clean, safe and healthy environment, provides tools to balance work and family life, fosters professional and personal development, promotes the experience of ethics and corporate values and seeks the well-being of all those working in the organization.

These commitments also extend to its stakeholders, with the addition of respect for human rights, the rejection of child and forced labor, protection of the environment, participation in social development initiatives and projects, the promotion of innovation and digital inclusion and development of a society of knowledge.

Our social responsibility obliges us to comply with current legislation, offer quality products and services, listen and respond to customer needs, meet expectations of our shareholders and investors and collaborate towards the company's sustainability.

b) Environment

All employees have the responsibility and obligation to comply with current local, state and federal legislation, as well as with regulations, standards and policies related to environmental preservation as defined by Axtel.

Our commitment is to reduce the negative environmental impacts caused by our operation, so we must all actively participate in promoting the responsible consumption of supplies and materials, while adopting any efficiency practices that improve processes.

As Axtel's employees, we must care for non-renewable natural resources used as part of our operation and foster a culture of preservation and protection of the environment, both inside and outside the organization.

c) Corporate Governance

Our Corporation is governed by the Board of Directors, led by two Co-Chairmen, who are responsible for defining the company's strategies, as well as reviewing the proper functioning of management.

The members of the Board of Directors review and validate the organization's Code of Ethics, as well as the financial statements, so the company can meet its growth objectives.

All complaints received through ALFA's Transparency Mailbox are reported to the Audit and Corporate Practices Committee, which prepares a quarterly report that is reviewed during sessions of the Board of Directors.

Our Corporate Governance practices aim to create sustainable value for our shareholders and investors. For this reason, the Board of Directors reviews our social, environmental and financial performance as part of the transparency and accountability exercise.

We have the commitment and responsibility to comply with the legislation to which we are bound by virtue of being a public company listed on the Mexican Stock Exchange.

d) Community Relations

All Axtel's employees are committed to promoting the social development of the communities where we operate. Therefore, we develop activities that contribute to improve the quality of life of vulnerable social groups.

e) Donations

As a part of society, Axtel acts in accordance with the current legal and financial framework, which is why the company makes donations to support different causes that promote social and environmental development of the communities where it operates.

We do not grant donations to obtain commercial advantages, therefore, donations cannot and should not be conditioned by a commercial operation with customers and suppliers.

Any donations to people, private accounts or organizations that may harm Axtel's reputation are not authorized.

Donations are made to civil society institutions and organizations registered as grantees, after having studied the project or event, as long as they do not lead to a conflict of interest and comply with current legislation.

Donations can only be authorized by the Office of the Executive Director of Human Capital and the General Management.

Complaint Tools (Transparency Mailbox)

At Axtel we do not accept committing, collaborating or participating in dishonest, destructive or illegal acts, even when requested by a superior, nor will we order or influence others to act incorrectly.

We must give immediate notification if we suspect, witness or know about unethical business conduct, or the committing of a dishonest, destructive or illegal act.

For this reason, we have established ALFA's Transparency Mailbox to receive and process complaints related to accounting, finance, internal control, conflicts of interest, bribery or corruption, breaches to the Code of Ethics and policies and, in general, about any activity that could be considered fraudulent, illegal or contrary to the company's interests.

The Transparency Mailbox is managed by the ALFA Internal Auditing Department, which will maintain the security of the information on the person making the complaint and related documents.

Employees who participate in the operation of, or provide support to the Transparency Mailbox must act with total discretion and integrity, while ensuring the information received is treated in a reasonable and appropriate manner.

During the course of the investigation, ALFA guarantees to protect the people who report any irregularity in good faith from any act of revenge, removal, harassment of any kind, demotion or dismissal; therefore, if someone attempts retaliation against an informant, will be subject to the corresponding disciplinary action.

Penalties

All violations of this Code of Ethics will be penalized, in accordance with the seriousness of the offense committed.

Penalties will range from reprimands, administrative penalties, suspension without pay, termination of the employment relationship and, if a serious crime has been committed and proven, such as theft, breach or abuse of trust, among others, criminal prosecution may be initiated.

The Executive Director of Human Capital, the Executive Director of the involved department and an invited Executive Director, will be responsible for reviewing breaches of the Code, and, if necessary, the Legal Department may also participate in the process.

All employees should report failures to comply with that established by this code to ALFA's Transparency Mailbox for investigation, monitoring and resolution.

Final Statement

Respect for the person is essential, be it colleagues, customers, suppliers, business partners, authorities or any individual with whom we interact on our daily work.

Personal integrity is the key to establishing and maintaining productive relationships, and consists of acting in accordance with our values and beliefs, based on seeking out and preserving the truth.

We always seek sincere, open, honest and timely communication that contributes to preserving a healthy and productive work environment.

We base our communication on the following concepts:

- Truth: Everything we say must have the honest purpose of being true.
- Reason: The only way of sharing our truth is through reasoning, so it makes sense.
- Harmony: Even if we do not agree with the ideas of others, in a healthy debate it is important to respect their dignity.
- Positivism: in our daily interactions, we always expect the best from colleagues, customers, suppliers and business partners.

Ethical Dilemmas

All Axtel employees must comply with the provisions of this Code of Ethics.

Before making any decision that raises doubts and involves an ethical dilemma, we should ask ourselves the following questions:

- Am I complying with the rules and legislation?
- If I do, is it legal?
- Is it against the company's policies?
- Does it go against my principles?
- If everyone does it, is it okay for me to do it?
- Would I like to see my decision published in the newspaper or on social media?
- Would I be ashamed if my colleagues found out about my decisions or actions?
- Can I tell my family about this decision?
- Are my actions and beliefs ethically consistent?

Questions based on the Ethical Decision Making tool, developed by the University of Copenhagen.

Letter of Acceptance and Commitment

As an employee of Axtel, I declare that I have read this Code of Ethics in its entirety and I am familiar with the Mission, Vision, Values and conduct guidelines governing our organization.

I agree to my commitment to comply with all applicable laws, rules and regulations, as well as company policies, procedures and guidelines.

Complying with the provisions established in this document will contribute to maintaining a work environment of respect, teamwork, collaboration and integrity, which encourages the professional development of everyone working in the company.

Therefore, I state that I understand the scope and mandatory nature of its compliance.

Full name:

Payroll number:

Executive Office:

Department:

Signature:

Place and date:

The 16 General Principles

Those working at Axtel must:

1. Practice a culture of respect between all company employees, avoid threats, abuse and harassment, and encourage fair and honest treatment.
2. Avoid discrimination based on race, gender, age, religion, political affiliation or social position.
3. Promote integrity, honesty, ethics and transparency in all relationships with customers, suppliers, government, shareholders, investors and colleagues.
4. Avoid any act of corruption, bribery or pay-offs in relations with all stakeholders, as well as reject any type of favors, gifts, gratuities of any kind; except for promotional items that meet the characteristics defined in the DR-AUD-05 No Gifts Directive.
5. Inform to our stakeholders of financial and sustainable performance in an accurate and timely manner.
6. Avoid situations that cause conflicts of interest among employees, customers, suppliers and different groups of interest.
7. Maintain hygienic and safe work facilities to protect the physical integrity and health of employees.
8. Avoid the use of Axtel's name and/or prestige, or the position within the company, for personal benefit.
9. Protect the company's confidential information, as well as the personal data of employees, customers, suppliers and groups of interest.
10. Care for and protect fixed assets, tangible and intangible, without disposing of them for personal benefit.
11. Refuse to make contributions in money or kind to political parties, government officials and/or institutions, as well as to participate in proselytizing activities on behalf of Axtel.
12. Seek fair, responsible business conditions and within a framework of respect with competitors.
13. Promote the social development of the communities where we have presence.
14. Reduce the negative impacts of our operations on the environment.
15. Manage the company's resources efficiently and responsibly.
16. Comply with these principles and report any violation of, or failure to comply with, the policies, guidelines, processes, and Code of Ethics, through the Transparency Mailbox, anonymously and confidentially.