

Integrity Policy



1. Objective

Axtel manifests its commitment to Integrity at all levels of the organization and rejection of any conduct that involves an illegal act that transgresses the values and ethical principles of the organization. With this policy, the guidelines for prevention, compliance, supervision, and accountability in integrity issues are reinforced, as well as in the detection and dissuasion of acts of corruption in Axtel and its subsidiaries.

2. Application

This policy applies to all personnel of Axtel, S.A.B. de C.V. and its subsidiaries, as well as any physical or legal person that has any relationship of any kind with the Company.


3. Guidelines

General principles

Axtel is committed to conducting all its activities fairly, promoting fair competition and in adherence to compliance with applicable policies and regulations, avoiding any activity that encourages acts of corruption, bribery or any other activity that leads to the non-compliance with these, as well as promoting a culture of integrity based on the principle of «Zero Tolerance» towards committing illegal and criminal acts and on the application of Axtel's ethical principles.


Elements of the Integrity Policy

1. Code of Ethics: Document that contains the values and ethical principles of Axtel, as well as guidelines for corporate action applicable to all collaborators in their relationship with clients, authorities, suppliers, shareholders and business partners.
2. Human Capital Policies: Axtel defines and delimits the functions of each area, as well as establishes the guidelines for personnel selection, hiring,



development, and administration of personnel services for all Company employees.

3. Conflict of Interest: Axtel encourages and promotes a climate of honesty and transparency, that discourages employees from incurring in any type of conflict of interest.
4. Labor Equality and Non-Discrimination: Axtel promotes equity, promoting equal opportunities in access to employment and working conditions, avoiding discrimination based on race, color, ethnic origin, religion, age, sex, illness, sexual orientation, political affiliation or social status.
5. Complaint Systems: Axtel has a complaint mailbox for collaborators and third parties, to report deviations, breaches, violations of the Code of Ethics, as well as any other act that jeopardizes compliance with applicable internal or external regulations.
6. Control, surveillance, and audit systems: Axtel, through its Compliance area, is responsible for monitoring and controlling compliance with this policy, as well as evaluating and reporting risks related to Integrity throughout the company.
7. Anti-Corruption Policy and Anti-Bribery Management System: Axtel has mechanisms and preventive measures to avoid possible acts of bribery or corruption by any collaborator, business partner, supplier, investor or any entity with which it establishes relations.
8. Training and Dissemination: Human Capital is in charge of training and disseminating this policy, as well as spreading, both internally and externally, the guidelines to maintain the culture of ethics and integrity in the company.
9. Transparency Mechanisms: Axtel is committed to responsible and honest advertising and marketing strategies for the products or services it offers to its customers, as well as to correctly and timely disclose its financial information, complying with their accounting and tax obligations.
10. Disciplinary Measures: Failure to comply with this Integrity Policy may lead to disciplinary measures according to each case.



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