

CODE OF ETHICS

axtel

CODE OF ETHICS CONTENTS

| | |
|---|----|
| 1. Message from the CEO | 5 |
| 2. Introduction | 6 |
| 3. Validity and Objective | 7 |
| 4. Why a Code of Ethics? | 8 |
| 5. Scope | 9 |
| 6. Organizational Philosophy | 10 |
| 7. Employee Responsibilities | 11 |
| 8. Compliance with the Code of Ethics | 12 |
| 9. Compliance with Legislation | 13 |
| 10. Compliance with Corporate Policies | 14 |
| 11. Conflicts of Interest | 15 |
| 12. Anti-corruption, Bribes and Gifts | 17 |
| a. Bribes | 17 |
| b. Illegal Commissions | 17 |
| c. Gifts and Hospitalities | 18 |
| d. Breakfasts, Lunches and Dinners | 18 |
| e. Political Contributions | 18 |
| 13. Ethics at Work | 19 |
| a. Hiring of Staff | 19 |
| b. Human Rights | 19 |
| c. Equity and Diversity | 20 |
| d. Discrimination | 20 |
| e. Harassment | 20 |
| f. Bullying | 21 |
| g. Drugs, Alcohol and Other Substances | 22 |
| h. External Staff (Outsourcing) | 22 |
| i. Interpersonal Relationships | 22 |
| j. Activities Outside Work | 22 |
| k. Health and Safety | 24 |
| 14. Use of Company Assets | 25 |
| 15. Confidentiality of Information | 27 |

| | |
|--|----|
| 16. Relationships with Interest Groups | 28 |
| a. Shareholders and Investors | 28 |
| b. Customers | 28 |
| c. Suppliers | 29 |
| d. Competitors | 29 |
| e. Authorities and Government | 30 |
| f. Community | 30 |
| 17. Marketing and Advertising | 31 |
| a. Marketing | 31 |
| b. Advertising | 31 |
| c. Sponsorship | 32 |
| 18. Communication | 33 |
| a. Media Relations | 33 |
| b. Labor Relations | 33 |
| c. Social Media | 33 |
| d. Financial Reporting | 34 |
| e. Information Used at External Forums | 35 |
| 19. Sustainability | 36 |
| a. Social Responsibility | 36 |
| b. The Environment | 36 |
| c. Corporate Governance | 37 |
| d. Community | 37 |
| e. Donations | 38 |
| 20. Reporting Tools (Transparency Helpline) | 39 |
| 21. Penalties | 40 |
| 22. Final Statement | 41 |
| 23. Ethical Dilemmas | 42 |
| 24. Letter of Acceptance and Commitment | 43 |
| 25. The 16 General Points | 44 |



1. LETTER FROM THE CEO

Dear Employee:

I am pleased to present the Axtel Code of Ethics, which establishes the basic guidelines governing relationships between work colleagues, customers, competitors, suppliers, government, shareholders and business associates.

It includes the principal guidelines and regulations relating to the values and ethical principles upon which the organization is founded and that we should observe and comply with when undertaking our work activities.

By adhering to these rules, we reaffirm the values that sustain our company's philosophy and contribute to keeping the good name of Axtel impeccable by endorsing its image with our interest groups.

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

Our Code of Ethics will undergo periodical revisions as a result of changes to laws, regulations, our commercial activity or in the business environment.

All changes will be authorized by the Management Committee and the Board of Directors.

General Management appoints the Executive Director of Human Capital as the person responsible for diffusing, supervising adherence, updating and reinforcing knowledge of this Code of Ethics.

The Internal Auditing Department is responsible for ensuring compliance and establishing controls to avoid inappropriate acts or conduct in all departments of the organization.

Let's now make this Code of Ethics a live document by sharing the responsibility of making Axtel a congruent, honest company that is respectful of values, legislation and everyone who works here.



Rolando Zubirán Shetler

CEO

2. INTRODUCTION

Axtel is a company that, in order to grow and become stronger, needs every worker 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 in decision making.

Axtel hopes we all act in compliance with the highest standards of personal and professional integrity, comply with the policies, procedures, guidelines and laws governing our operation and actively promote this by disseminating an ethical culture.

Since our Code of Ethics was approved by the Board of Directors and Management Committee it applies to executive directors, directors, managers, leaders, department heads, coordinators, employees, consultants, external staff (outsourcing), contractors and anyone who renders their professional services to our company, regardless of their position or relationship with the company.

This Code of Ethics, published in January 2017, describes the ethical conduct expected of all employees, it is valid indefinitely and is based on our company's corporate philosophy.

Its objectives are:

- To establish ethical principles that guide employee actions and behavior by seeking a productive, respectful and harmonious working environment.
- To define the guidelines for conduct in relations with interest groups.

4. WHY A CODE OF ETHICS?

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

This document is corporate in its scope and applies to all employees at any professional level. Its observance is general and mandatory. It grants no exclusion by virtue of hierarchy and requires the participation and commitment of all for fulfillment, as well as for preventing, reporting and correcting any failure to comply.

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 us to commit an act of non-compliance, therefore, the company reserves the right to apply the respective penalties.

All employees commit to reading and complying with that established in the Code of Ethics upon signing a letter and taking an online course once a year.



6. ORGANIZATIONAL PHILOSOPHY

Mission

To enable organizations to be more productive and to help people improve their quality of life.

Vision

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

Values

Values are the basis upon which our actions are built and define the philosophy guiding how we deal with work colleagues, customers, suppliers and business associates. They express what we are, how we behave and act, and how these contribute to the achievement of our objectives.



Team work. Our strength

We draw our strength from coordinated team work and constant communication to achieve a common objective.



Respect. Our commitment

The most valuable element for us are people, which is why we foster personal and professional development in an inclusive environment of respect.



Customer focus. What sets us apart

We focus on achieving objectives that exceed customer expectations, seeking their permanent satisfaction in order to establish long-term relationships.



Innovation. Our passion

Our passion is innovation and we are constantly looking for new ways to do things, always thinking about the future and ensuring simplicity and flexibility are a priority.



Quality. Our standard

Since we are an organization that seeks excellence, we have established superior standards governing all practices to ensure optimal quality in our processes and services.



Integrity. Our pillar

Our operation is based on the transparency of all actions and on building relationships of trust in order to create a permanent commitment to society and help strengthen it.

7. EMPLOYEE RESPONSIBILITIES

It is the responsibility of General Management, with the support of Executive Offices, to keep this Code of Ethics up-to-date and to communicate and diffuse it to all staff.

It is each employee's responsibility:

- To sustain, experience and promote a culture in which ethical conduct prevails, in accordance with the principles and values shared here.
- To actively participate in the diffusion of this document, guaranteeing compliance, suggesting amendments and/or reporting any failure to do so or infraction to the ALFA Transparency Helpline.
- To 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 interest groups.

8. COMPLIANCE WITH THE CODE OF ETHICS

The Management Team should set an example in word and action, ensuring that employees comply with these principles. It is therefore necessary:

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



9. COMPLIANCE WITH LEGISLATION

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 respective 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
- Industrial Property Law
- Federal Copyright Law
- Federal Law for the Protection of Personal Data in the Possession of Private Parties
- Stock Market Law
- General Law on Environmental Protection
- General Law on Climate Change
- Mexican Official Standards

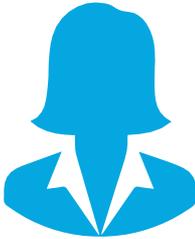
You can consult the legislation applicable to our company with the Legal and Regulatory Executive Office.

10. COMPLIANCE WITH CORPORATE POLICIES

All Axtel employees are required to be familiar with corporate policies, procedures, dress codes and interior labor regulations, 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 working environment characterized by respect.

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



11. CONFLICT OF INTEREST

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

A conflict of interest exists when an employee is in a position to make a decision on behalf of the company that could benefit them personally or, when due to the relationship he may have with a third party, they are prevented from objectively fulfilling their responsibility, placing the organization at risk through the improper use of their position, authority or influence.

In other words, when we allow personal interests and relationships to obstruct our judgement and ability to make decisions with integrity and honesty.

Situations that can be considered conflicts of interest:

- The granting of favors using Axtel resources that benefit an employee or their close relatives.
- Having relatives working for Axtel or at any companies with which it executes any kind of transaction or are competitors.
- Having a relative as a supplier of Axtel. It is not permitted for employees to be suppliers to our company.
- Performing an additional job, paid or unpaid, that is related to the company's activities or line of business and places at risk the disclosure of classified, strategic and/or confidential information.

-
- Using company resources (printers, computer equipment, stationery) for personal purposes.
 - Participating in or influencing business requirements, negotiations or processes with customers or suppliers with whom there is a family relationship.
 - Having a relative as a subordinate or direct boss in a similar post or any position that is part of the same process, in order to avoid the perception of favoritism or injustice at work.
 - Informing of participation as a shareholder, director or any other business relationship with business competitors. Shareholders who have or intend to have a business relationship with the company are subject to the same procedures and conditions as other suppliers and customers.
 - Using information for personal benefit or that of third parties by selling it or making it available to interests outside those of the company.
 - Using the name of a colleague without their consent to exploit their position or influence for personal benefit.
 - Those of us working at Axtel should sign a conflict of interest declaration each year to ensure familiarity with it and commitment to it.
 - Any potential case of a conflict of interest will be analyzed and assessed by the Executive Office of Human Capital and by the Internal Audit Department.
 - For further information, consult the conflict of interest policy published on the corporate Intranet.

12. ANTI-CORRUPTION, BRIBES AND GIFTS

a) Bribes

State and federal laws and regulations, as well as Axtel's No Gifts and Anti-Corruption Policy, strictly prohibit gifts, bonuses, payments, donations, invitations, money or anything being offered, made, requested or received in exchange for favorable or advantageous treatment of customers, suppliers, authorities or government officials, which is considered a pay-off.

Since Axtel employees reject bribery and extortion in all its forms, we neither accept nor request gifts, bonuses or favors, and neither do we expect special attention for employees, customers or suppliers under any circumstances.

When it has been established or is suspected that an employee is affected by or involved in any kind of extortion and/or bribery, this must be reported to the ALFA Transparency Helpline.

b) Illegal Commissions

An illegal commission is anything of value given to a supplier, integrator or decision maker to receive favorable treatment in the awarding of business or government contracts or sub-contracts.

These actions are considered to demonstrate a lack of integrity and honesty, and 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 bonuses that do not comply with current regulations and the ethical principles considered in this code.

Any suspicion of bribery and/or illegal commissions should be communicated to the ALFA Transparency Helpline.

c) Gifts and Attention

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

We do not accept or offer gifts, bonuses, donations or personal attention of any kind, making it clear that Axtel policies expressly prohibit us from so doing.

d) Breakfasts, Lunches and Dinners

Axtel can offer its customers or suppliers routine lunches as a courtesy in the normal course of business. When an event is considered for customers, integrators or suppliers that exceeds that established by policy, it should be previously authorized by the respective Executive Office and/or General Management.

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

If any customer or supplier suggests an invitation beyond that considered normal, it should be authorized by the respective Executive Director before being accepted.

e) Political Contributions

It is prohibited to use Axtel funds or resources to undertake political activities that are personal 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.

Axtel promotes a working environment that is characterized by respect, cordiality and integrity. It values every employee as an individual and as an important member of the team.

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

We are responsible for maintaining a safe, healthy work place that provides maximum reduction of risks, is free from acts of intimidation or physical violence, drugs, alcohol and pornography.

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

a) Hiring Staff

The selection and hiring of staff is based on a candidate's ability, professional experience and degree of identification with the company's values.

Anyone participating in this process should use the staff recruitment, selection and hiring policy along with this code, performing the established procedure with respect and without generating false expectations for candidates.

b) Human Rights

Every person has the right to life, liberty and equality in the eyes of the law, to freedom of expression, as well as to work, food, and the maximum achievable 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 respect for these rights.

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 relate to our work colleagues without distinction of department or level. The treatment of others is based on total respect, honesty and dignity, valuing people and the cultural differences between us.

Axtel fosters and promotes equity by encouraging equality for men and women through job opportunities, working conditions, professional development, training and participation in decision-making processes.

d) Discrimination

We prohibit discrimination against persons or groups, including employees, customers, suppliers and shareholders, on the basis of their race, color, ethnic origin, language, religion, age, sex, pregnancy, disease, disability, political affiliation, sexual orientation or social conditions.

e) Harassment

Based on respect for the person, we provide a working environment free from any harassment resulting from racism, sexism, ethnic comments or jokes, sexually suggestive behavior or inappropriate physical contact, gestures, photographs, mocking or statements of a sexual nature.

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

f) Bullying

Harassment at work or bullying limits the personal and professional development of employees, leads to a mental state characterized by insecurity, reduces productivity and harms the working environment.

Therefore, at Axtel we avoid:

- Unfair treatment
- Shouting
- Threats
- Physical or verbal abuse
- Making offensive jokes, rude comments or using obscene language
- Jokes or comments about an employee's condition or characteristics
- Offensive visual displays
- Psychological pressure.

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

If an employee is the subject of unlawful pressure in their working relationships, whether inside or outside the organization, they should report this immediately to the Human Resources Department, to the Office of the Executive Director of Human Capital and to the ALFA Transparency Helpline.

g) Drugs, Alcohol and Other Substances

For those working at Axtel, 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.

h) External Staff (outsourcing)

Companies that supply external staff (*outsourcing*) must comply with the guidelines established by the Federal Labor Law, grant all benefits stipulated by law and respect the human rights of employees.

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

i) Relationships Between Employees Outside Work

When a romantic relationship is established between two employees, it is not permitted for them to remain in the same department or work division, especially if the professional level is boss/subordinate. This is to prevent damage to the working environment and discriminatory treatment of others.

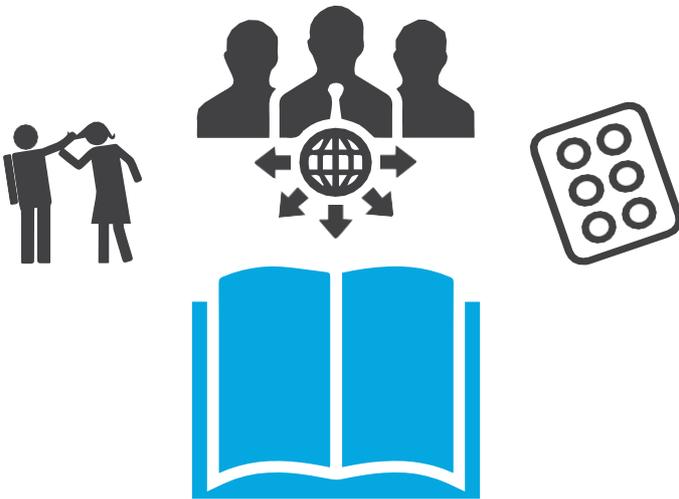
Any relationships between employees that go beyond friendship are not permitted when one or both of the persons is/are married, but not to each other.

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, or 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 that take precedence over the fulfilment of their responsibilities, as well as the use of company resources to perform activities outside work.



k) Health and Safety

At Axtel we are committed to complying with occupational health, safety and hygiene laws and regulations, whether internal, local, state or federal.

- We should maintain an appropriately clean and tidy environment at facilities that 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 place at risk the health of internal or external staff, or the community in general.
- It is the responsibility and obligation of staff to be trained in the use of protective equipment provided by the company for the performance of their activities, as well as how to use it appropriately.
- Any activity, no matter how important, may only be performed when the appropriate safety measures have been complied with. This is in order to ensure the physical integrity and health of employees.
- We should maintain an appropriate, safe and healthy work environment since safety is the responsibility of all.

14. USE OF COMPANY ASSETS

We are all responsible for safeguarding and correctly and efficiently using company assets and property by following the procedures established to prevent their loss, theft or unauthorized use.

Company assets and activities include:

- Time
- Cash, checks, wires and credit cards
- Land and buildings
- Records
- Vehicles
- Equipment, including desktop computers and laptops, photocopiers, scanners, office furniture and meeting rooms, projectors, telephones and cell phones
- Work tools
- Hardware and software
- Waste and obsolete electronic equipment
- All company funds and properties.

We protect company assets and property:

- By ensuring funds are used for lawful business purposes
- By keeping correct and complete records of funds spent
- By using corporate credit cards solely for company 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 company instructions
- By using telephones, email and the Internet solely for lawful business purposes

The improper use of company assets and resources can be considered theft or abuse of trust and lead to the termination of the working relationship or legal action.

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

Confidential information is that which is important for the management of businesses, delicate, has an inherent value or whose misuse could cause damage to the company and/or its employees.

15. CONFIDENTIALITY OF INFORMATION

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, legal or administrative disputes; organizational changes, staff information, customer details, written communications, information transmitted through the data network; infrastructure and technology; and new product research and development.

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

Personal data entrusted to Axtel by any entity is used by scrupulously complying with the provisions of the Federal Law for the Protection of Data Held by Private Parties, making the privacy policy public knowledge through the privacy notice on the website: <http://axtelcorp.mx/avisoprivacidad>

For further information you can consult the Data Security Policy, Guidelines on Staff Responsibilities for Data Security and Guidelines on Data Classification and Use published on the corporate Intranet.

a) Shareholders and investors

Those of us working at Axtel share the commitment and responsibility to generate value for the company so it appears attractive to shareholders and investors, and to meet the goals and objectives derived from our corporate strategy.

b) Customers

- Our sales promotion and arguments must be free from false information regarding the availability, timeliness and/or quality of our products and services, as well as the sales terms.
- Axtel selects its customers and/or markets based on business criteria/strategies, without establishing discriminatory differences of any kind, by treating them in a manner distinguished by 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 services of the highest quality that guarantee the continuity of their business by offering state-of-the-art technology that helps them become more productive and efficient.

We take special care to preserve the reputation and integrity of our company and customers by not offering our services to those who may place our reputation at risk.

c) Suppliers

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

We take great care with the selection process, which includes, among other things, prices, 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 should 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.

Those of us working at Axtel 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.

Our own and privileged information concerning the competition must never be obtained directly or indirectly by means of bribery, extortion, gifts or pay-offs.

Axtel does not participate in any agreement whose intention is 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 the obligation of Axtel to be familiar with, respect and promote compliance with laws, regulations, standards and other applicable legal provisions.

It is strictly prohibited to promise, offer, pay for, lend, give or transfer any company fund, asset or object of value to public officials or government employees involved in a decision making process for the purchase of goods and services or products, which could be typified as a pay-off and be penalized by Mexican laws.

All doubts concerning business conducted with state and federal government officials should be sent via Sales Management to the Executive Office for Legal and Regulatory Matters.

f) Community

Our conduct in the community should reflect the values we promote.

No behavior, action or attitude that threatens morality and decency will be tolerated, since we must maintain the company's well-respected image.

a) Marketing

We communicate clearly, precisely 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 essential decisions.

We avoid unfair, incomplete, confusing or deceitful information so as not to negatively affect market growth or cause the loss of customers.

b) Advertising

At Axtel we comply with current local, state and federal legislation, ensuring that our advertising is not deceitful and does not generate false expectations regarding our products or services.

Our advertising and other communications are prepared responsibly and are based on honesty. They describe our products accurately and objectively, which is essential to preserve customer loyalty and gain the trust of prospects.

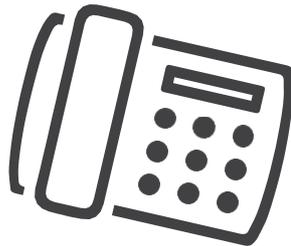
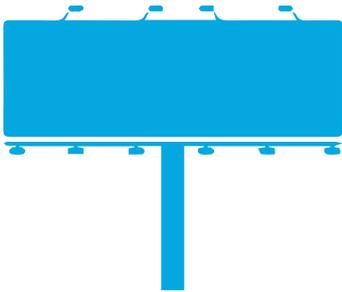
We avoid the use of texts, audios or images that promote harmful stereotypes concerning gender, race, religion, disability, interpersonal relations, ethnic groups, level of education or social condition, or that threaten the human rights of children, women, persons with disability and other vulnerable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

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

c) Sponsorship

At Axtel we do not sponsor, directly or indirectly, any events or activities that promote violence or vulgarity, or that attack the values or safety of the public, the family or the individual, or that transgress the guidelines established in this Code of Ethics.

To resolve doubts regarding which events can be considered candidates for sponsorship, the Office of the Executive Director of Human Capital can be consulted.



a) Media Relations

The department authorized to receive requests from and provide information to the media is the Department of Communication and Image, through the Office of Corporate Communication, as well as its official spokespersons.

If information is required, we offer immediate, honest, fair and impartial information without favoring any group or person.

Any requests for information from the media received by any department or person in the company should be immediately sent to the Office of Corporate Communication.

b) Labor Relations

At Axtel we practice open, 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 important for their jobs and their work and personal experience.

At Axtel we are open to the ideas and suggestions of employees, and also respond to their complaints and demands in a timely manner while acknowledging their achievements and results.

c) Social Media

All employees are ambassadors of our brands, so we take care with what we say so as not to have negative effects on our company's reputation.

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

d) Financial Reporting

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

We do not participate in any activities that threaten the integrity of financial reporting, such as incentives for personal benefit, falsifying company goals to expand the stock market, achieving sales quotas, fulfilling budgetary commitments or increasing income to meet investor expectations.

It is prohibited to amend or falsify documents, records or reports, as well as to hide any 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 revision or investigation by the National Banking and Securities Commission and by the United States Securities and Exchange Commission.

Financial reporting is a strategic resource. We fulfill obligations to inform our interest groups in a timely, accurate and adequate manner of the company's relevant results and events, using the formats, means of communication and deadlines established by the authorities.

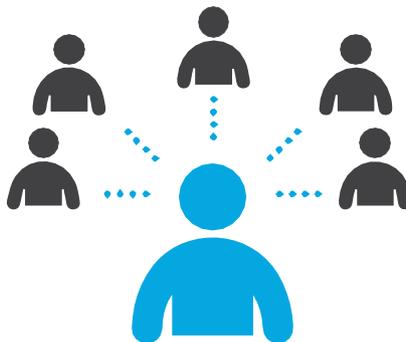
It is the responsibility of all Axtel employees to report any situation that places the company's present and future income at risk to the ALFA Transparency Helpline in a timely manner.

e) Information Used at External Forums

As part of our activities, and due to our track record and knowledge, we are often invited to participate at public events such as congresses, 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 and Image, who shall review the relevance of the participation and authorize the content of their presentation or involvement.

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



a) Social responsibility

Since Axtel is a socially responsible company, it offers employees a respectful, clean, safe and healthy environment, provides tools to balance work and family life, fosters professional and personal development, promotes the lived experience of ethics and corporate values and seeks the wellbeing of all who work at the organization.

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

Our social responsibility obliges us to comply with current legislation and offer quality products and services, listen and respond to customer needs, meet shareholder and investor expectations and work towards the company's sustainability.

b) The 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 relating to environmental conservation as defined by Axtel.

Our commitment is to reduce the negative environmental impact of our operation and for this reason we must all actively participate in promoting the responsible consumption of supplies and materials, while adopting any efficiency practices that will improve processes.

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

c) Corporate Governance

Corporate Governance is the responsibility of a Board of Directors, headed by two Vice Chairpersons, 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 revise and validate the organization's Code of Ethics and financial statements so the company can achieve its growth objectives.

All reports received through the ALFA Transparency Helpline are communicated to the Audit and Corporate Practices Committee, which prepares a quarterly report that is reviewed during sessions of the Board of Directors.

The purpose of our corporate governance practices is to create sustainable value for shareholders and investors. For this reason we inform them of our social, environmental and financial performance as part of the exercising of transparency and accountability.

Our commitment and responsibility is 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 employees are committed to promoting the social development of the communities where we operate. We are therefore involved in activities that contribute to improving the quality of life of vulnerable social groups.

e) Donations

As a part of society, Axtel acts in accordance with the legal and financial framework governing it. For this reason the company makes donations to support different causes promoting the social and environmental development of the communities where it operates.

We do not make donations to obtain business advantages, therefore, they cannot be nor should they be dependent on a commercial operation with customers and suppliers.

Any donations to persons, 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, provided that they do not lead to a conflict of interest and comply with current legislation.

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



20. REPORTING TOOLS (Transparency Helpline)

At Axtel we do not accept, in any way, the committing of, or the collaboration or participation in, dishonest, destructive or illegal acts, even when a superior requests this. Nor do we order or influence others to act improperly.

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

To this end we have established the ALFA Transparency Helpline to receive and process reports in relation to accounting, finance, internal control, conflicts of interest, bribery or corruption, failure to comply with the Code of Ethics and policies and, in general, any activity that could be considered fraudulent, illegal or contrary to company interests.

The Transparency Helpline is managed by the ALFA Internal Auditing Department which will maintain the security of the information on the informant and related documents.

All employees who participate in the operation of, or provide support for, the Transparency Helpline must act with complete discretion and integrity while ensuring the information received is used in a reasonable and appropriate manner.

During the course of the investigation, ALFA guarantees to protect the persons who report any irregularity in good faith from any act of revenge, removal, harassment of any kind, downgrading of professional level or dismissal, therefore, anyone who retaliates against an informant will be subject to the corresponding disciplinary action.

21. PENALTIES

All violations of this Code of Ethics will be subject to a penalty in accordance with the seriousness of the violation committed.

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

The Office of the Executive Director of Human Capital, the Auditing Department, the Executive Director of the department in question and an invited Executive Director will be responsible for reviewing any failure to comply with the code, along with the Legal Department, if necessary.

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



Buzón de
Transparencia

alfa

Respect for the person is essential, whether we are dealing with colleagues, customers, suppliers, business associates, authorities or any other individual with whom we have a relationship in the course of performing 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 working environment.

We base our communication on the following concepts:

- **Truth:** Everything we say must have the honest purpose of being true.
- **Reason:** We share our truth through reasoning so it makes sense.
- **Harmony:** Even if we do not agree with the ideas of others, it is important to respect their dignity.
- **Positivism:** We always hope for the best from our colleagues, customers, suppliers and business associates.

23. ETHICAL DILEMMAS

All Axtel employees must comply with that set forth in 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 it, is it legal?
- Is it against company policies?
- Does it go against my principles?
- If everyone does it, is it OK 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.

24. LETTER OF ACCEPTANCE AND COMMITMENT

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

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

Complying with what is established in this document will contribute to maintaining a working environment that favors respect, teamwork, collaboration, integrity and the professional development of all who work at the company.

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

Full name: _____

Payroll number: _____

General Management: _____

Department: _____

Signature: _____

Place and date: _____

25. THE 16 GENERAL PRINCIPLES

Those working at Axtel should:

1. Practice a culture of respect between all company employees, avoid the use of threats, abuse and harassment, and foster fair and honest treatment.
2. Avoid discrimination on the basis of race, gender, age, religion, political affiliation or social position.
3. Foster integrity, honesty, ethics and transparency in all relationships with customers, suppliers, government, shareholders, investors and employees.
4. Avoid any act of corruption, bribery or pay-offs in relations with all interest groups, and refuse any kind of favor, gift, pay-off or payment in kind.
5. Inform interest groups of our financial and sustainable performance in an accurate and timely manner.
6. Avoid any situations that cause conflicts of interest between employees, customers, suppliers and different interest groups.
7. Keep the work facilities clean and safe to protect the physical integrity and health of employees.
8. Avoid the use of Axtel's name and/or prestige, or our position within the company, for personal benefit.
9. Protect confidential company information as well as the personal data of employees, customers, suppliers and interest groups.

-
10. Look after and protect fixed, tangible and intangible assets, without using them for personal benefit.
 11. Refuse to make financial contributions or contributions in kind to political parties, government officials and/or institutions, as well as to participate in proselytizing activities while using the company's name.
 12. Seek out fair, responsible business conditions within a framework of respect.
 13. Promote the social development of the communities where we maintain a presence.
 14. Reduce the negative impact of our operations on the environment.
 15. Manage company 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 Helpline anonymously and confidentially.

axtel

Please think of the environment before printing out our Code of Ethics.