

1. Objective

Axtel highlights commitment, honesty and ethics as part of its business philosophy. So based on the anti-corruption guidelines Por lo tanto, quienes trabajan en y para la Compañía, deben cumplir con las siguientes pautas instituidas in the tenth Principle of the United Nations Global Compact, it encourages its collaborators to be an example of behavior in any deal or negotiation on behalf of the company.

2. Application

This policy applies to all personnel of Axtel, S.A.B. de C.V. and its subsidiaries, of all hierarchical levels regardless of the type of contract.

3. Guidelines:

To prevent, detect and investigate acts of corruption in any form, Axtel has defined this Anti-Corruption Policy, therefore, those who work in and for the Company, must accomplish with the following guidelines

- 3.1 Comply with current laws and regulations.
- 3.2 It is prohibited to give and/or receive gifts or any kind of economic stimulus or materials goods to give or receive any type of improper advantage in the commercial relationships between Axtel and its clients or suppliers, or to authorities, other companies, contacts, organisms or institutions.
- 3.3 It is prohibited to give and/or receive any improper or illegal payment, or any type of compensation contrary to laws or morality, to obtain or offer some influence in a business relationship.
- 3.4 It is prohibited the offering of bribes, incentives, payments, gifts, or hospitality, directly or indirectly, to government officials, contacts, other companies, suppliers, clients, organizations or institutions, to influence or improperly reward a decision, or action that benefits the Company.
- 3.5 All financial operations must be booked and available for inspection by internal and external authorities.
- 3.6 Conduct all commercial activities following the principles of honesty and ethics.
- 3.7 Comply with the existing laws on tax and other matters. Duly pay all taxes, fees and deductions.
- 3.8 Abide by national fiscal and legal provisions including those that prohibit the deduction of bribes paid.
- 3.9 Promote practices that prevent and avoid corruption, to generate healthy and competitive investments and business relations.
- 3.10 Charitable donations and sponsorships should be transparent and according to law. No political donations or benefits are permitted in violation of express laws on this matter. Ensure that politically exposed figures, their immediate and close family members, are not involved in donations or sponsorships.
- 3.11 Do not include bribes as part of the payment of a contract to public officials or employees of the counterparty.

- 3.12 Do not use intermediaries, such as subcontractor agents, consultants, or any type of third parties, to conceal payments to public officials or business associates or their family and friends.
- 3.13 Ensure that all payments made to any Axtel representative correspond to services legitimately supplied.
- 3.14 Persons who refuse to give or receive bribes or other improper or dishonest economic or material incentives, including gifts and incentives, must not be sanctioned in any way by the Company.
- 3.15 All employees, suppliers and clients are obligated to report any noncompliance with this policy to the ALFA Transparency Helpline at buzon@alfa.com.mx or by phone, call toll-free 01-800-265-2632 in Mexico and 1-866-482-1957 in the United States and Canada.
- 3.16 No one who reports an act of corruption should suffer any form of reprisal, including harassment, denigration or dismissal. Anyone who attempts a reprisal against such persons will be subject to the corresponding disciplinary action.
- 3.17 Violations of this policy may result in a criminal or civil risk for Axtel, as well as any employees involved, including arrest and serious sanctions such as justified dismissal (among other legal repercussions).
- 3.18 The Compliance Area is independent of the company operations and it is responsible for the anti-bribery compliance function in Axtel, as well as for updating and verifying this Policy compliance
- 3.19 **The Compliance Area and Internal Control are will promote continuous improvement on the established anti-bribery management system, through risk assessment, SWOT analysis, semiannually audits and review of senior management, as well as at the time considered necessary.**

As a socially responsible company, Axtel has adopted the guidelines of the Inter-American Convention against Corruption and the United Nations Convention against Corruption. In keeping with its sustainability strategy, Axtel has implemented these anti-corruption practices to act ethically, honestly and responsibly, in all its activities.

Rolando Zubirán Shetler
Chief Executive Officer

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