

Supplier

Code of
Ethics

axtel

TABLE OF CONTENTS

I.	Message from the Treasury and Supply Chain Chief Operating Officer	5
II.	Introduction	7
III.	The Reason for a Code of Ethics	8
IV.	Scope	9
V.	Our Values	10
VI.	Legislative Compliance	11
VII.	Compliance with Axtel Policies and Directives	12
VIII.	Guidelines	13
	Business and Ethical Conduct	13
1.	Quality	13
2.	Product Safety	13
3.	Conflicts of Interest	13
4.	Anti-corruption and Bribery	13
5.	Financial Integrity	14
6.	Illegal Commissions	14
7.	Gifts, Gratuities and Business Courtesies	14
8.	Breakfasts, Lunches and Dinners	14
9.	Prevention of Money Laundering	15
10.	Prevention of the Financing of Terrorism	15
11.	Fair Dealing, Fair Competition and Antitrust	15
12.	Asset Protection	15
13.	Intellectual Property	16
14.	Information Security	16
15.	Personal Data Privacy	16
16.	Animal Testing	16
	Health and Safety	16
17.	Prevention of Injuries and Accidents at Work	17
18.	Use of Forbidden Chemical Substances and Materials	17
19.	Emergency Responses	17
20.	Mitigation of Ergonomic Risks	17
21.	Occupational Health Procedure	17
22.	Use of Personal Protective Equipment	17
23.	Legislative Compliance	18

Human Rights	18
24. Child Labor	18
25. Forced Labor	18
26. Freedom of Association	18
27. Working Hours	19
28. Harassment	19
29. Wages and Salaries	19
30. Decent Working Conditions	19
31. Non-Discrimination and Equal Opportunities	19
Environmental Commitment	20
32. Legislative Compliance	20
33. Pollution Prevention	20
34. Emissions	20
35. Waste	20
36. Energy Use	21
37. Water, Air, Soil and Biodiversity	21
38. Raw Materials	21
39. Chemical Products and Hazardous Materials	21
40. Recycling and the End of the Product's Useful Life	21
41. Reducing the Impact of Packaging and Deliveries	22
42. Taking Action to Minimize Climate Change	22
Control and Compliance	22
43. Auditing and Evaluations	22
44. Corrective Action	22
45. Reporting Channel	22
46. Supplier Responsibilities/Compliance	23
47. Acceptance of the Supplier Code of Conduct	23
48. Penalties for Failure to Comply	24
49. Supplier Contact Information	25
50. Signature of Acceptance	25

Dear Suppliers,

As part of our commitment to sustainability, and our awareness that you play a very important part in compliance with the quality standards for goods and services offered to customers, we have prepared this document indicating the guidelines to be followed and the conduct expected of suppliers, who are one of our main interest groups.

Our goal is to create and maintain business relationships with suppliers based on trust, transparency, ethics, honesty, and responsibility, with a fair and efficient selection process, while always respecting their rights and offering equal opportunities for all.

For this reason we have prepared this Supplier Code of Ethics, revised and approved by our Board of Directors and the Auditing department.

Those of us who work at Axtel and form part of its Value Chain must respect and comply with the guidelines of this Code of Ethics to improve our business and work performance while respecting the environment and promoting community development.

Thank you for reading this document, supporting its circulation and promoting compliance with its provisions among your employees and anyone that has or will have a business relationship with Axtel.
Yours sincerely,

Marcelo Díaz de Salas Buerba
Treasury and Supply Chain Chief Operating Officer
Axtel

This Supplier Code of Ethics defines the minimum standards of responsibility, quality, ethical conduct, respect for human rights, care for the environment, and working practices that suppliers of goods and services marketed by Axtel must meet, as established in the company's corporate culture.

These guidelines are based on the Axtel Code of Ethics, which applies to all employees of all levels, Policies and Procedures, and applicable legislation.

The basic principles are:

- Ethical, honest, responsible and upstanding conduct
- Fair and respectful treatment
- Compliance with all laws and regulations applicable to supplier operations
- Respect and care for the environment
- Safe working conditions
- Non-discrimination
- The reading, understanding, adherence to and compliance with the principles of this Code of Ethics.

III. The Reason for a Supplier Code of Ethics

The Supplier Code of Ethics defines Axtel's expectations of suppliers and their expected compliance for the establishment of a Sustainable Supply Chain in accordance with domestic and international legislation and standards.

Axtel has been a signatory of the United Nations Global Compact since 2011 and is included in the Sustainable Price and Quotations Index for the Bolsa de Valores de México (Mexican Stock Exchange), as well as the Dow Jones Sustainability MILA Index. This is thanks to its ethical practices in corporate governance, labor matters and respect for the environment.

Furthermore, we adhere to the standards of the OECD, ISO 26000, the Carbon Disclosure Project, the Universal Declaration of Human Rights, the International Labor Organization and the Principles of the Global Compact.

This Code of Ethics provides the framework for actions and the commitment of suppliers who wish to establish and maintain a business relationship with Axtel.

IV. Scope

This Supplier Code of Ethics applies to all permanent or temporary suppliers providing us with raw materials, services or products, and that directly or indirectly participate in the sale of goods and services on domestic and international markets. Axtel expects suppliers to use this Code as a guide to ethical, responsible and legal trading practices in all their operations.

Our corporate philosophy enables us to align our actions with the goal of always providing the best options in goods and services for our interest groups.

Our values are as follows:



TEAMWORK
our strength

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



RESPECT
our commitment

Since people are our most valuable asset, 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 while establishing long-term relationships.



INNOVATION
our passion

Our passion is innovation and we are always searching for new ways to do things, looking to the future and ensuring simplicity and flexibility are our priorities.



QUALITY
our standard

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



INTEGRITY
our pillar

Our operation is based on the transparency of all actions and on building relationships of trust to create a permanent commitment to society and its strengthening.

To promote actions that favor sustainability, ethics, the environment, good working conditions and quality, Axtel requests permanent and temporary suppliers comply with the law and regulations, whether municipal, state, federal or international, in relation to their operations. They are also asked to adhere to and support the principles of national and international bodies.

VII. Compliance with Axtel Policies and Directives

As a sustainable company, Axtel has developed a series of policies and directives within the framework of its Code of Ethics and applicable legislation, including an Anti-corruption Policy, Conflicts of Interest Policy, No-Gifts Directive, Supplier Policy, Human Rights Policy, Environmental Policy and Sustainability Policy. These are available for suppliers and their interest groups at the following website: www.axtelcorp.mx/sustentabilidad

BUSINESS AND ETHICAL CONDUCT

1. Quality

Axtel suppliers must offer and deliver goods and services with the agreed and contracted quality standards and price while complying with all previously agreed specifications, requirements, terms and conditions.

2. Product Safety

Suppliers must deliver goods and services that comply with the quality and safety standards indicated in applicable legislation, and that do not place the health of users at risk or negatively impact the environment.

3. Conflict of Interests

There is a conflict of interest when an employee makes decisions on behalf of the company for personal benefit, thereby risking the reputation and interests of Axtel, when the relationship with a supplier impedes the objective performance of their job, and when there is abuse of power, authority or influence.

There is a conflict of interest if the supplier or any member of their family has a relationship of friendship, kinship or political affiliation with an Axtel employee.

Any Supplier enjoying a business relationship of any kind with Axtel must communicate, both verbally and in writing, any situation they consider a conflict of interest between Axtel and their company.

You can consult our Conflict of Interest Policy on the following website: www.axtelcorp.mx/sustentabilidad

4. Anti-corruption and Bribery

Federal and state laws and regulations, as well as Axtel's own policies, strictly prohibit the offer, request for or receipt of cash, gifts, donations, invitations, trips and free tickets, etc. in exchange for favorable or advantageous treatment. We therefore demand Suppliers rigorously avoid bribery in all forms: extortion, fraud, bribery, and misappropriation of funds.

5. Financial Integrity

Suppliers shall not make false, imprecise or intentionally deceitful entries in accounts logs, records or information provided to internal and external auditors associated with Axtel and must keep financial documentation in accordance with legally accepted accounting standards and principles.

6. Illegal Commissions

An illegal commission is anything of value a supplier gives to a person with decision-making power in return for favorable treatment associated with the awarding of a contract.

Such actions are considered dishonest and illegal, and can lead to the termination of employment, the supplier's business relationship and, as applicable, legal and even criminal action.

Any suspicion of bribery and/or illegal commissions can and must be communicated to the corresponding Axtel management line and/or be reported through the ALFA Transparency Helpline. (<http://axtelcorp.mx/nuestra-empresa/buzon-de-transparencia>)

7. Gifts, Gratuities and Business Courtesies

The acceptance of gifts can create a conflict of interest when given or received for commercial gain, effectively constituting bribes or illegal commissions.

Axtel employees do not accept gifts: they always reject them and explain that Axtel policy does not permit their acceptance. We therefore demand Suppliers cooperate and strictly observe this provision.

Any breach of this policy must be reported to the ALFA Transparency Helpline.

The No-Gifts Directive can be consulted at www.axtelcorp.mx/sustentabilidad

8. Breakfasts, Lunches and Dinners

Axtel employees may accept meals or other common invitations from Suppliers as a courtesy during the natural course of business

provided the purpose of the invitation is not to receive favorable treatment in relation to business acquisitions and they are not systematic or continuous. We request all Suppliers cooperate and strictly respect this provision.

9. Prevention of Money Laundering

Axtel expects suppliers to have a good market reputation and prove they participate in commercial activities using funds acquired by legitimate means that comply with current laws against money laundering.

10. Prevention of the Financing of Terrorism

Axtel suppliers must prevent conduct associated with the financing of terrorism, criminal acts or any action that violates current legislation. For this reason our company applies due diligence, exercises informational and internal control and, if necessary, collaborates with the competent authorities.

11. Fair Dealing, Fair Competition and Antitrust

Axtel expects suppliers to compete honestly and fairly, respect antitrust and free competition legislation, to not promote anticompetitive practices such as fixing prices, costs, terms or conditions of sale, distribution channels, discounts or restrictions given a certain certification or geographic location, among other things.

Axtel does not and will not participate in any agreement designed to limit the free play of forces in those markets where it operates and neither will it use improper means to improve its competitive position. In addition to being improper, it is illegal for companies to enter into agreements for the purpose of manipulating the prices of goods or services. We therefore demand the same of suppliers.

12. Asset Protection

Any loss, damage, misuse, theft, embezzlement or real or alleged destruction of funds or assets belonging to Axtel and its suppliers shall be immediately reported in writing to the relevant body as defined by mutual agreement. Axtel employees must strictly observe the provisions set forth for the sale of assets to Suppliers.

13. Intellectual Property

Axtel suppliers must maintain the company's business strategy and information confidential, including that which is not public and not accessible to external parties, while also respecting and protecting intellectual property rights.

14. Information Security

When a Supplier accepts a business relationship with Axtel, when Axtel sees fit it must sign a Conflict of Interest Statement and Confidentiality of Information Letter to demonstrate it is aware of and strictly committed to joint security of the information received and handled through different (verbal, written or electronic) media.

Suppliers that end their business relationship with Axtel must not reveal the company's confidential and insider information, known as "industrial or trade secrets" or "technical know-how". Revealing this could constitute a competitive or financial disadvantage and could be subject to criminal or legal action.

15. Personal Data Privacy

Axtel and its subsidiaries, affiliates, holding companies and/or controlled companies, in compliance with article 15 of the Federal Act for the Protection of Personal Data held by Individuals (LFPDPPP), make its privacy notice available to the general public at <http://axtel.mx/informacion/aviso-de-privacidad>. Suppliers assume the commitment to read said notice and, when applicable, state their acceptance and comply with its contents.

16. Animal Testing

Axtel suppliers must not test, or allow business partners to test, products, raw materials or any other consumable on animals, particularly in the case of finished products delivered to our company.

HEALTH AND SAFETY

Axtel suppliers must demonstrate they provide safe working conditions for their employees and that they enjoy a healthy working environment.

17. Prevention of Injuries and Accidents at Work

Axtel Suppliers must provide employees with safe, healthy and reliable working conditions that include adequate measures to prevent any physical, chemical, biological and/or radiological risk and/or accident, injury or disease in their facilities and/or work area.

18. Use of Forbidden Chemical Substances and Materials

Axtel Suppliers must define and implement programs for the proper handling of chemical, biological and toxic substances and avoid using forbidden materials and substances in the manufacture or production of products delivered to our company.

19. Emergency Responses

Axtel Suppliers must design and define emergency plans to prevent, detect, avoid, reduce and control negative impacts on the environment, working conditions and the health of their employees and the community. They must implement response programs and protocols, informing employees of evacuation procedures and routes, drills, and the location and use of fire detection and extinguishing equipment and first-aid supplies.

20. Mitigation of Ergonomic Risks

Axtel Suppliers must identify, review and reduce employee exposure to tasks demanding excessive physical effort, provide facilities designed to avoid contingencies and suitable furniture that allows them to perform their duties without putting their physical integrity at risk.

21. Occupational Health Procedure

Axtel Suppliers must have established processes and programs that comply with health and safety standards, as well as guidelines and policies for managing, supervising, measuring and reducing the risk of occupational accidents, injury and/or disease.

22. Use of Personal Protective Equipment

Axtel Suppliers must guarantee that all employees receive periodic training in the use of personal protective equipment and supervise its use whenever required since we may request or conduct

inspection visits to ensure compliance with this provision. Any failure to do so could represent a breach of legislation leading to the imposition of fines and indicate the operation of both businesses is at risk.

23. Legislative Compliance

All Axtel suppliers must comply with Mexican Official Standards, municipal, state and/or Federal regulations and laws as well as the requirements of official bodies such as Civil Defense, the Labor Ministry and the International Labor Organization (ILO), among others, that issue guidelines and regulate the actions of businesses in matters of occupational health and safety.

HUMAN RIGHTS

Axtel suppliers must respect and comply with the Human Rights of their employees. These rights are fundamental for their personal dignity and development, while also directly or indirectly preventing, avoiding or reducing the negative impacts of their activities, goods or services on Human Rights in general.

24. Child Labor

Axtel suppliers shall not use or support the use of child labor. According to the ILO, suppliers must identify all employees under 18 years of age. Axtel prohibits child labor and has set 18 as the minimum age for employment.

25. Forced Labor

Our Suppliers shall not use forced labor, which is any type of work or service not provided voluntarily but under threat of force or punishment. In the event that immigrants or vulnerable people are hired, this must be in accordance with the provisions of current legislation.

26. Freedom of Association

Our Suppliers shall respect the right of their employees to form part of labor organizations and/or to associate with those that represent them in the negotiation of collective bargaining agreements or in negotiations concerning conditions of employment agreements, in accordance with the Federal Labor

Act, ILO recommendations and International regulations.

27. Working Hours

Suppliers must guarantee their employees work during the hours established by current legislation and, when working hours are extended, the corresponding overtime is paid.

28. Harassment

Axtel suppliers must provide a healthy environment free from harassment at work and sexual harassment, bullying, coercion, verbal or psychological abuse, as well as from physical or mental violence in their facilities and their business relationships.

29. Wages and Salaries

Suppliers shall pay their employees a salary in accordance with applicable legislation, including minimum wages and overtime, while providing, as a minimum, the benefits set forth in the Federal Labor Act. Wages or salaries must be sufficient to cover the basic needs of workers and their families.

30. Decent Working Conditions

Axtel Suppliers must, when hiring employees, inform them of salary conditions, payment dates and the corresponding benefits. No deductions should be applied to salaries as a disciplinary measure or on any other grounds not previously established in legislation. Facilities must be clean and safe.

31. Non-Discrimination and Equal Opportunities

Axtel suppliers must offer employees equal opportunities in relation to professional development, training, access to jobs and compensation, while not discriminating in the labor or professional spheres on the basis of race, gender, social condition, disability, religion or political affiliation, among others, in accordance with the Universal Declaration of Human Rights. This also applies to the selection and recruitment of personnel, wages and salaries, working conditions, promotions, dismissals and pensions.

ENVIRONMENTAL COMMITMENT

Most raw materials come from natural resources and non-renewable fuels, and water, energy and other materials are used for their transformation. These processes have an impact on the air, soil and the environment that could damage the health of ecosystems and humans. Suppliers must therefore ensure their activities have a minimal impact on Nature.

32. Legislative Compliance

Axtel Suppliers must comply with environmental legislation applicable to their industry and with municipal, state and federal regulations while working with the company, avoiding any conduct that, even if it is legal, could harm its reputation and image.

33. Pollution Prevention

Axtel Suppliers should establish programs or processes that help reduce the negative impacts of their activities on the environment, ensure the proper and responsible use of raw materials, define processes for the reuse and recycling of materials, ensure correct waste separation as well as its proper final disposal, and the prudent use of water, energy and fossil fuels.

34. Emissions

Suppliers must commit to reducing their greenhouse gas emissions, chemical or hazardous, volatile, aerosol, corrosive substances and/or particles generated by their production processes or service delivery, implementing environmental eco-efficient programs and declaring their commitment to the implementation of the environmental measures required to reduce climate change.

35. Waste

Axtel Suppliers must implement a suitable program for the classification, separation and management of waste generated by their operations that will enable them to reduce environmental impact and establish measures that permit consumers to use, separate and send their products for recycling at the end of their useful life.

36. Energy Use

Our Suppliers must establish production processes that enable them to make savings in the consumption of energy and natural resources to thereby reduce their environmental impact and implement the use of renewable energy.

37. Water, Air, Soil and Biodiversity

Axtel Suppliers must establish an environmental management system that includes a policy and procedures to make savings and better exploit water consumption, lower energy consumption, avoid air and soil pollution and harm biodiversity through the production and management of their products and services.

38. Raw Materials

Axtel Suppliers must assess the environmental impact of their products and services during their entire lifecycle, from the extraction of raw materials to disposal of the product once it is no longer useful, since the extraction, production and disposal process could affect ecosystems and have negative impacts on the health of humans, flora, fauna and habitats.

39. Chemical Products and Hazardous Materials

Axtel Suppliers that use chemical, hazardous, toxic or corrosive products must eliminate and manage them safely so they do not have a negative impact on health, the environment and the community.

They must design and implement plans to prevent, avoid and reduce any contingency leading to an emergency and/or that could place people's physical integrity at risk, while also training employees in the proper handling of hazardous materials and their final disposal.

40. Recycling and the End of the Product's Useful Life

Axtel Suppliers must report how their products can be reused, recycled or sent for proper disposal at the end of their useful life to avoid polluting soil, water and/or the air and creating greenhouse gas emissions.

They should also use natural resources efficiently, improve their processes and maintenance practices and introduce new eco-friendly technologies.

41. Reducing the Impact of Packaging and Deliveries

Axtel Suppliers must design and implement programs to reduce the negative impacts of packaging used for their products or in their deliveries, reduce the amount of packaging materials used, recycle as much as possible, and optimize dispatch and delivery methods to reduce their consumption of energy and fuels.

42. Taking Action to Minimize Climate Change

Axtel promotes the establishment by Suppliers of programs for measuring and calculating their environmental footprint in order to help slow climate change, reduce pollution and halt the deterioration of natural resources.

CONTROL AND COMPLIANCE

To ensure compliance with this Supplier Code of Ethics, our business partners must establish and maintain suitable administration and control practices.

43. Auditing and Evaluations

Suppliers shall designate a person to be responsible for compliance with this Code at all their facilities since Axtel may make quality assurance and control visits, with or without prior notice, in person or through a third party.

44. Corrective Action

Axtel suppliers shall take all necessary action to correct problems detected during quality assurance and control visits in order to comply with the provisions of this document.

45. Reporting Channel

Any breach of this Supplier Code of Ethics, Axtel Policies and Directives, or any illegal act on the part of Axtel employees must be reported anonymously and confidentially using the ALFA Transparency Helpline.

To communicate with the Transparency Helpline, any of the following may be used:

Email: buzon@alfa.com.mx

WhatsApp/SMS: (+52 1) 81 2353 9583

Website, www.alfa.com.mx/buzon.html

Toll-free calls:

Mexico: (01 800) 265 2532

United States: (1 866) 482 1957

Canada: (1 866) 238 2860.

46. Supplier Responsibilities/Compliance

Axtel does not wish or intend to intervene in the internal affairs of suppliers since it is extremely respectful of their rights. However, as a member of the company's Supplier community a relationship of mutual loyalty and responsibility obliges them to maintain their reputation and avoid any activity or conduct that could affect their prestige.

Therefore, all Axtel suppliers undertake to:

- Respect this code
- Participate in any activities for verification of the Code that Axtel may establish
- Implement corrective actions that may be required as a result of any verification activity Axtel has performed involving its organization
- Communicate any information it considers relevant concerning the requirements established in this Code to Axtel or the ALFA Transparency Helpline.

47. Acceptance of the Supplier Code of Ethics

Every Supplier receives a copy of this Supplier Code of Ethics to ensure their commitment to the highest standards of integrity in business relationships with Axtel.

Axtel and its Suppliers never, under any circumstances, agree to commit or collaborate in dishonest, destructive or illegal acts, or order or influence others to do so or act wrongly. They are

responsible for immediately notifying the corresponding areas, if they suspect, observe or learn of any unethical business conduct.

Axtel states its guarantee that there are not, nor will there be, any reprisals against the people or companies that, in good faith, report their suspicions of a violation of this Supplier Code of Ethics. Their identity will be protected as much as possible.

Axtel Suppliers undertake to comply with this Supplier Code of Ethics and circulate it within their organizations to maintain an ethical, respectful business relationship in strict compliance with legislation.

48. Penalties for Failure to Comply

Axtel may establish specific regulations or supplementary regulations to this Supplier Code of Ethics to correct cases of noncompliance. It may also exercise the legal or disciplinary measures it deems fit. Any improper conduct or breach of this Code will have consequences not only for the person who infringes it, but also for those who, through action or omission, approve this conduct or know of the infringements and do nothing to immediately notify and correct them.

49. Supplier Contact Information

Please print this page, scan it and send it by email to the following contact:
Sustainability and Corporate Philosophy

Email: sustantabilidad@axtel.com.mx

Supplier Name and Company Name: _____

Website: _____

Name of Supply Chain Head: _____

Position: _____

Email: _____

Office Phone No: _____

Mobile Phone No: _____

Company Address: _____

Street and Number: _____

Neighborhood: _____

Zip Code: _____

City and State: _____

Country: _____

50. Signature of Acceptance

I have read the Axtel Supplier Code of Ethics, am aware of its contents
and undertake to comply with its guidelines.

Name and Company Name of the Supplier: _____

Name of the Supply Chain Head: _____

Position: _____

Signature: _____

Date: _____

axtel

Por favor, piensa en el medio ambiente antes de imprimir nuestro Código de Ética.