

MAXCOM ANTI-CORRUPTION POLICY

MAXCOM TELECOMUNICACIONES, S.A.B. DE C.V. (“MAXCOM”) is company that conducts its business honestly, ethically and with integrity, and considers compliance with these principles by all its employees as a fundamental part of its business culture.

MAXCOM expects that all its board members, officers, shareholders, partners, workers and employees, and subordinate third parties such as agents, consultants, business partners and other representatives, conduct themselves according to these principles of ethics and integrity when acting on behalf or representing the company, irrespective of where they reside or conduct their business

It is strictly prohibited to:

- Offer bribes to or accept bribes from government officials or private individuals.
- Offer or accept payments to commence or speed up processes or procedures.
- Offer or accept gifts or hospitality to or from government officials or any third party that contravenes our principles of integrity.
- Making political donations on behalf of MAXCOM.
- Using sponsorship or donations to be given favorable treatment.
- Establishing a business association with third parties without observing minimum due diligence requirements.
- Conduct money laundering.

To make sure that all the company’s employees and third parties conduct themselves according to the principles of honesty, ethics and integrity that MAXCOM expects and demands, several documents have been drafted to form our anti-corruption policy, the aim of which is to prevent, detect and investigate acts of corruption.

MAXCOM’s anti-corruption policy includes the following documents:

- Code of Conduct
- Standards of integrity, duly supervised and audited
- Organization Manual
- Staff Hiring Policy
- Anti-corruption Policy

These documents are available to all employees for consultation. If you have any questions about them, you may send an e-mail to arealegal@maxcom.com.

All MAXCOM employees and all third parties who have a legal relationship with the company must report any act, event or manner of conduct or behavior that is contrary to the principles of honesty, ethics and integrity or that transgresses the provisions of MAXCOM’s anti-corruption policy.

Acts of corruption may be reported personally to any member of the anti-corruption compliance committee at Guillermo Gonzalez Camarena 2000, Col. Santa Fe Centro, Mexico City, C.P. 01376, Delegación Alvaro Obregón, by e-mail to politica.anticorrupcion@maxcom.com, or on any of the following government web sites:

<http://www.programaanticorrupcion.gob.mx/index.php/consulta/denuncia.html>
<http://www.anticorrupcion.cdmx.gob.mx/index.php/sistema-de-denuncia-ciudadana>

If you have any doubts about reporting this type of conduct, please contact the legal department of MAXCOM at arealegal@maxcom.com.

Any transgression of MAXCOM's anti-corruption policy shall be penalized in accordance with the company's internal policies and may range from a reprimand to immediate dismissal, depending on the severity of the transgression, irrespective of any other penalty that may be imposed in accordance with statutory legislation.

MAXCOM will assist the authorities at all times to ensure that these obligations are met, so any act of corruption found and proven will be reported to the authorities.