

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

1. OBJECTIVE

Each of the associated companies of ISATEL Group (the "Company") are committed to maintain the highest level of professional and ethical standards in the development of their commercial operations and businesses, for which they have established a policy of "zero tolerance" to the acts that oppose their organizational principles, values, and institutional philosophy.

Following up on the foregoing, the companies of ISATEL Group are:

- Isatel de México, S.A. de C.V.;
- Integración en Servicios y Asesoría en Telecomunicaciones y Electrónica, S.A. de C.V.; y,
- Consultoría Integral en Telecomunicaciones y Electrónica, S.C.

The Company carries out each of its activities with honesty, integrity, loyalty, and responsibility, and complies with all national anti-corruption laws and regulations. Likewise, the Company will always seek to maintain business with companies and institutions that share these policies.

In order to reaffirm the integrity and responsibility commitment that distinguish the Company, it has established this Anti-Bribery and Anti-Corruption Policy (hereinafter "the Policy"), so that any event related to bribery, corruption, fraud or any other illegal act, identified or reported to the Company's managers, will be investigated and sanctioned (where appropriate) or reported to the competent authorities, in accordance with the applicable internal regulations.

2. SCOPE

This policy will be applicable to all employees of the Company, regardless of their level, position, or functions.

Likewise, this policy requires that all third parties related to the Company, line up and respect what is contained in this document. This also shall apply to sales agents, distributors, suppliers, consultants, service providers, joint venture partners, managers, and contractors.

3. DEFINITIONS

Concept	Definition
Corruption	Any act, attempt or premeditated omission, to obtain a benefit for anyone, and that cause a detriment of the organizational principles of the Company.
Bribery	Offering, promising, giving, accepting, or requesting any payment (cash, gifts, or even excessive entertainment), or any incentive, in order to obtain a commercial, contractual, regulatory or personal, undue advantage.

Undue Advantage or Undue Benefit	Advantages or benefits that are illegal or are intended to evade compliance with laws or regulations, the Code of Ethics, and other internal policies of the Company, mainly regarding bribery, corruption, extortion, market practices, and interest conflict.
Public Officers	Any person who performs a job, position, or commission of any nature in the Public Administration, regardless of it is in the federal or local entities, such as decentralized organizations, state companies, organizations and companies related to these, public trusts, autonomous entities, the Congress of the Union, or the Federal Judiciary; or a person that manage federal, state or municipal economic resources. Likewise, any member belonging to any political party or candidate for any public position.
Hospitalities	The payment or offering of lunch/dinner (any meal) and entertainment (sporting, social or cultural events) to third parties or Public Officers.
Gifts	Any valuable item or benefit delivered to a person, where the receiver accepts it for free or at a price lower than the market value. For the purposes of this Policy, items for marketing purposes that bear the Company's brand, and have only a symbolic value will not be considered Gifts, as well as those granted by the Company to its own employees, or that are granted between employees.

4. CORRUPTION AND BRIBERY

There is "zero tolerance" for any type of corruption, including payment advantages or bribery, therefore the employees of the Company are prohibited from giving, promising, requesting, requiring, accepting, or receiving incentives, directly or indirectly to/from public officers, entities or companies, persons, or family members, with the intention of inducing them to use their position, power, or influence to help the Company obtaining an Undue Advantage.

Then, it will be considered that an employee committed an Act of Corruption and Bribery if he/she gave or received: any object, value, cash, commission, preferential treatment, gifts, rebates and discounts, hospitality excess, contributions and/or donations, if these are given or received in exchange of a benefit for himself/herself or for the Company.

It will be mandatory to maintain business only with those partners who line up with the standards and rules of the Company, included in this Policy and in the Code of Ethics.

5. GUIDELINES ON HOSPITALITIES AND GIFTS

This Policy allows Hospitalities or Gifts of symbolic value or that have only marketing purposes, such as mugs, calendars, pens, or any other item that displays the Company's logo, or similar items given on a free day, holiday, or any other special occasions, as long as they are legal and usual in a particular market, and when they are properly delivered and registered.

Hospitalities and Gifts may never be accepted or offered if this creates an interest conflict for the Company. If in doubt, the employee should always seek the authorization of the Supervisor or Manager, or where appropriate, of the General Manager, before accepting or offering Hospitalities and Gifts.

Hospitalities and Gifts may only be accepted or offered when they:

- a) Do not break the applicable laws, or the internal guidelines of the Company.
- b) Are appropriate and in line with local customs.
- c) Are reported for their correct registration.
- d) Have been duly authorized.

Hospitalities and Gifts may not be accepted or offered when they:

- a) Are in cash, goods, loans or shares.
- b) Are granted in advance or with the intention of affecting a favorable business decision.

Hospitalities and Gifts must always be reasonable in quantity and directly related to the business of the Company. All Hospitalities and Gifts must be proportionate to the occasion and comply with this Policy, the laws, and local regulations of the country in which the receiver is located.

The expenses of the activities carried out as Hospitalities and Gifts by the Company's employees must be duly and transparently registered. This means that these expenses and activities must be registered in the Company's accounting records, and must be evidenced and clearly referenced to the participating persons, categorizing the business purpose, describing the activity, declaring the amount of money spent, identifying the receiver, among other details that could be considered relevant.

Expenses exceeding what is reasonably necessary for the business purpose will not be approved, including expenses for spouses and children, additional travel, or luxurious lodging or entertainment.

6. DONATIONS AND SPONSORSHIPS

Donations and sponsorships are considered part of the Company's efforts to fulfill social responsibility activities, as well as to promote the identity of the Company's brands. The General Management is the only authority in the Company that can approve donations and sponsorships.

For this, a formal authorization process must be carried out, in which the profile of the beneficiary, institution or organization that will receive the donation or sponsorship, is documented. The registry must be made in accordance with this Policy.

Donations and sponsorships that may be used for promoting acts of corruption are forbidden. Also, they may not be used to finance or support organizations or candidates for public positions, no matter if they represent a political party or are independent.

7. RELATIONSHIPS WITH PUBLIC OFFICERS

In all the interactions with public officers on behalf of the Company, it is mandatory to establish cordial relationships and to comply with applicable laws and with this Policy. The relationship with public officers must be carried out in a strictly professional manner, observing values of honesty, integrity, loyalty, responsibility, and transparency. The purpose of the relationship must be clear at all times, and it should be documented completely.

The Company's areas that interact with authorities must have a file with the registries of the interactions and progress of the corresponding procedures. Under no circumstances any employee should promise, offer, or grant Gifts to public officers, or to their relatives, partners, or companies in which said public officer is a shareholder or has a significant interest. Hospitalities could be given if the corresponding authorization from the General Manager has been processed, justified, and duly registered.

Employees or third parties acting on behalf of the Company are prohibited from promising payments, discounts, or any value to a public officer, for the purpose of influencing, expediting, or gaining any Undue Advantage.

8. FINANCIAL AND ACCOUNTING REQUIREMENTS

The Company must maintain correct, complete, and accessible accounting records that allow the traceability and accuracy of its operations. No operation should be left out of the accounting records.

In accordance with the Company's commitment with honesty and integrity, all areas comply with the requirements established by law, by keeping complete and reliable books, records, and accounts. All expenses made by the Company or its employees on its behalf are fully and accurately described in the proper documentation, not only in terms of amounts, but also marking their nature or destination.

9. CONSEQUENCES OF NON-COMPLIANCE

Violations of this Policy and of the anti-bribery and anti-corruption laws and regulations may carry serious civil and/or criminal penalties, both for the Company and for the participants in the acts. The sanctions can be applied both for natural persons as well as for legal persons, even if the acts were carried out outside of Mexico.

Therefore, it is the responsibility of the Company's employees to:

- a) Fully understand and comply with this Policy, the Code of Ethics, and other applicable internal guidelines.
- b) Where appropriate, ensure that his/her teamwork know and comply with the guidelines of this Policy.
- c) Help prevent acts of bribery or corruption, being alert to any breach. If he/she witnesses or has knowledge of any, he/she should report it immediately.
- d) In case of establishing relations with third parties, ensure that they line up with this Policy, the Code of Ethics, and other applicable internal guidelines.
- e) Contact the Supervisor, Manager, or the General Manager in case of doubts, suggestions and/or comments.

Failure to comply with this Policy may cause the following sanctions, depending on their severity:

- a) Verbal reprimand.
- b) Written warning.
- c) Temporary suspension of functions or of certain benefits.
- d) Termination of the labor relationship.
- e) Others that legally proceed, including damage repairing.

Breach from third parties that have accepted this Policy may lead to the termination of their relationship with the Company, as well as the execution of all legally available resources.

Violation of anti-bribery laws, including provisions on accounting and administrative matters, may also lead to civil and/or criminal penalties for the Company and for the persons involved.

The Company reserves the right to do all legal actions available to report any act of corruption and/or bribery, so that it may be investigated and, where appropriate, sanctioned by the corresponding authorities.

10. SUPERVISION AND REVISION

The Company is responsible for establishing controls to ensure that the business is carried out in accordance with this Policy and with all applicable laws and regulations. The corporate audit services will periodically supervise this Policy's compliance, as well as the procedures and other related criteria.

It is the responsibility of the Managers, Supervisors or of those who carry out commercial operations or relationships with third parties, to enforce this Policy, lead by example, and provide guidance to their collaborators and subordinates.

11. BREACH NOTIFICATION

All employees who suspect or know of any violation of this Policy or of the applicable laws, must immediately notify their Supervisor, Manager or the General Manager. The employees could report any breach to the Company's Compliance Direct Line.

He/she can use any of the following methods to submit a report:

55 56826543
isatel@isatel.mx

All reports are handled and administered anonymously, and are maintained as such, as long as it is reasonably and legally possible. Any negative consequences caused for a report is strictly prohibited, and the Company will immediately take disciplinary measures against any employee who attempts them against anyone who reports a violation or breach of this Policy, which may result in the termination of their labor relationship.

Questions about this Policy should be consulted with the Supervisor, Manager, or with the Human Resources area.

12. DISCLOSURE

The disclosure of this Policy will be made on the website of ISATEL Group. In addition, it will be sent to all employees and collaborators via email, and they may even be requested to take a specific training course regarding this subject. A copy of this Policy will be sent to sales agents, distributors, suppliers, advisors, service providers, joint venture partners, consultants, contractors and/or third parties with whom the Company maintain any type of relation, so they must sign it in acceptance.