

TRAFFIC MANAGEMENT AND NETWORK ADMINISTRATION POLICY CODE

I. Purpose

SERVICIOS TRONCALIZADOS, S.A. DE C.V., trading as **SERVITRON**, is a Mobile Virtual Network Operator (MVNO) that provides, commercializes or resells the mobile Internet access service previously contracted from the Wholesale Shared Network operator, Altán Redes, S.A.P.I. de C.V. This Code has therefore been prepared based on the policies implemented by said network operator to provide the Wholesale Mobile Telecommunications Service, given that **SERVITRON** does not have the network elements necessary to implement traffic management and network administration policies, in accordance with **Article 12**, last paragraph, of the Guidelines for traffic management and network administration applicable to concessionaires and authorized parties providing Internet access services, published on July 5, 2021, in the Official Gazette of the Federation (hereinafter, **the Guidelines**).

The Guidelines referenced in the preceding paragraph were issued by the Federal Telecommunications Institute (IFT). With the entry into force of the Law on Telematic Media and Broadcasting (LMTR), the authority over these matters has been transferred to the Digital Transformation and Telecommunications Agency (ATDT). **SERVITRON** will comply with the guidelines issued by the ATDT in the exercise of said authority. (Regulatory reference updated.).

This Traffic Management and Network Administration Policy aims to ensure the quality, capacity and speed of the mobile Internet access service commercialized by **SERVITRON**, as well as to preserve the integrity and security of the network, in accordance with Article 3 of the Guidelines issued by the Federal Telecommunications Institute.

Through this Code, **SERVITRON** timely informs its mobile Internet access service users of the measures or actions that Altán Redes, S.A.P.I. de C.V. has implemented or may implement for traffic management and administration of the Wholesale Shared Network.

The mobile Internet access service provided by **SERVITRON** through the Wholesale Shared Network operator includes DNS, Firewall and CG-NAT (Carrier Grade Network Address Translation) services, which allow the translation of private IPs to public IPs on the Internet, as well as ISP services so that users have Internet browsing capability.

Data traffic over the coverage offered by Altán Redes, S.A.P.I. de C.V. operates under the Best Effort scheme, meaning the network does not guarantee quality of service (QoS) for traffic — it does not differentiate or prioritize the type of user data traffic to/from the Internet, except in cases of congestion.

II. Principles

The Traffic Management and Network Administration Policy of the Wholesale Shared Network Operator ensures the following:

1. **Free choice.** The mobile Internet access service provided by SERVITRON through the Wholesale Shared Network Operator allows end users to access any content, application or services on the Internet, without hindering, limiting, degrading, restricting or discriminating access thereto, in accordance with the contracted service and while they have an active data plan.
2. **Non-discriminatory treatment.** SERVITRON is obligated to treat the traffic of similar-type content, applications or services equally on the Internet among its end users.
3. **Privacy and security of communications.** At a technical level, SERVITRON is obligated to ensure the inviolability of users' private communications through the Wholesale Shared Network and their privacy. The Wholesale Shared Network Operator does not use DPI/DFI techniques for traffic monitoring.

The following are recommendations to minimize privacy risks for our end users and their private communications:

- Before subscribing to or using applications, terminal equipment or offered services, compare them and assess how well they protect your privacy and personal information.
- If you are already subscribed to or using terminal equipment, social networks, operating systems, digital services that enable entertainment, transportation and online commerce services, use the privacy features and settings. Be sure to visit the “settings” and “privacy” sections they offer.

- Read the Privacy Policies that each company asks you to accept before using their services, and additionally review the terms and conditions.
- Identify which information you can provide and which is not necessary to disclose before using a service or product.
- Find out who is responsible for the use of your information and with whom it is shared.
- Before performing activities such as uploading photos and videos, liking content, registering credit cards, etc., make sure you know how companies will handle that information.
- Use privacy configuration mechanisms so that only the information you want is visible. Avoid providing information beyond what is required.
- Ensure that application and software downloads are made from official app distribution stores (e.g., App Store, Play Store, AppGallery, etc.).
- Avoid registering on unofficial or unknown websites that request your information. Privacy policies generally indicate what information is collected but do not detail it. For example, under “SMS Messages”, it is often unclear whether the sent message, the received message, etc. is collected.
- When using digital services, companies often collect certain information that is not established within their privacy policy.

- 4. Volume-based traffic management with a defined validity period.** The services offered by **SERVITRON** to end users operate on the Wholesale Shared Network coverage, through the 4.5G network under equal conditions and on a non-discriminatory basis with respect to other users, in accordance with contracted rates, defined validity periods, application conditions and Best Effort browsing speeds, as registered with the Federal Telecommunications Institute.

Applicable for Data consumption on the Wholesale Shared Network coverage, and once the contracted package is exhausted, users may:

- i) contract a new Product, and/or
- ii) contract an Excess Consumption Package that includes a data volume at a reduced speed of 512 kbps.

Users may use mobile data (data transfer). Applicable for Data consumption in the National territory and International Roaming on networks in the USA and Canada.

All data traffic generated by users will be terminated or received by Altán Redes, S.A.P.I. de C.V. using its own interconnection routes with different operators in Mexico, as well as with national and international operators for international long-distance calls. In all cases, data traffic includes access to any content, application or service on the Internet on non-discriminatory terms.

This management is carried out following the guidelines established by Altán Redes, S.A.P.I. de C.V., in order to offer quality services, avoid possible network saturation and protect compliance with the quality terms and conditions of the services offered.

5. Quality and congestion management. The services offered by **SERVITRON** through the Wholesale Shared Network Operator guarantee the quality of the mobile Internet Access service. Accordingly, **SERVITRON** offers its users, with respect to all types of traffic routed through the Wholesale Shared Network, the following:

- **Downlink Data Transmission Rate:** Average amount of data downloaded per 1 (one) second, which shall be at least 4 (four) Megabits per second (Mbps) at the outdoor Coverage edge (not indoors) during Peak Hours of the Wholesale Shared Network.
- **Uplink Data Transmission Rate:** Average amount of data sent per 1 (one) second, which shall be at least 1 (one) Megabit per second (Mbps) at the outdoor Coverage edge (not indoors) during Peak Hours of the Wholesale Shared Network.

The quality of services may be affected by greater traffic demand or a larger number of end users than originally anticipated by **SERVITRON**. Services may also be affected or suffer interruptions, interference, outages or suspension due to various reasons beyond **SERVITRON**'s control that do not constitute a breach of service, such as atmospheric phenomena, use of terminal equipment inside buildings, underground areas, tunnels or other similar locations where there is no signal or the signal is weak, and any other circumstance affecting wireless transmissions. Notwithstanding the foregoing, **SERVITRON** will provide services at the highest quality level, continuously and efficiently, under equal conditions and on a non-discriminatory basis with respect to other users, in accordance with the quality parameters established by the Federal Telecommunications Institute, applicable regulations, the service contracted by the user, and through the Wholesale Shared Network operator.

In order to maintain the integrity of the Wholesale Shared Network and not affect other end users, the Wholesale Shared Network Operator may suspend activations in a specific region or locality, without any liability for **SERVITRON**.

Congestion management is used to preserve the operation and quality of the Wholesale Shared Network, in order to guarantee the best experience for **SERVITRON** users. Speed reduction applies to all data traffic, as failure to implement it could affect the operation of the Wholesale Shared Network and the quality of the services offered.

6. **Blocking. SERVITRON**, through Altán Redes, S.A.P.I. de C.V., does not carry out data traffic blocking.
7. **Paid prioritization.** Neither Altán Redes, S.A.P.I. de C.V. nor **SERVITRON** offer paid prioritization services, as the Wholesale Shared Network Operator does not have a reference offer for such service
8. **Sponsored data.** The Wholesale Shared Network Operator offers sponsored data in the following cases:
 - Free access to the URL <http://educacionconequidad.sep.gob.mx> (with IP 168.255.101.55) for the **Aprende en Casa** program. Applies when the user is using the service in certain node-cells determined according to the zones requested by the government, Monday through Friday from 8 A.M. to 4 P.M., at a reduced speed of up to 300 kbps.
 - Free access to the following URLs defined for COVID at a reduced speed of up to 300 kbps:
 - ✓ <https://coronavirus.gob.mx>
 - ✓ <https://www.gob.mx>
 - ✓ <http://aprendeencasa.sep.gob.mx>
 - ✓ <https://aprende.gob.mx>
 - ✓ <https://telesecundaria.sep.gob.mx>
 - ✓ <https://educacionbasica.sep.gob.mx>

SERVITRON will periodically verify the validity and availability of the sponsored access listed in this section, which are subject to modification by instruction of the Wholesale Shared Network Operator or the competent authorities. The current and updated list of sponsored access will be available at www.servitron.net.

III. Glossary

- Network administration: The set of activities, methods, procedures and tools used by Internet access service providers for the operation and utilization of the resources and capabilities of a public telecommunications network.
- Altán Redes, S.A.P.I. de C.V.: The Mexican company responsible for designing, deploying, operating and maintaining the Wholesale Shared Network, from which **SERVITRON** contracts Wholesale Mobile Telecommunications Services. Information available at: <https://www.altanredes.com/>.
- ATDT: Digital Transformation and Telecommunications Agency, the telecommunications regulatory authority in Mexico, successor to the IFT under the LMTR
- CG-NAT: Carrier Grade Network Address Translation.
- Core: The network layer responsible for providing connectivity between different access points.
- DNS: Domain Name System
- eNB: Evolved Node B.
- Traffic management: The set of techniques used by Internet access service providers for the handling and processing of data traffic.
- IFT: Federal Telecommunications Institute (now succeeded by the ATDT).
- ISP: Internet Service Provider.
- LMTR: Law on Telematic Media and Broadcasting
- Mobile Virtual Network Operator: The concessionaire or authorized party that provides, commercializes or resells mobile services or capacities previously contracted from a wholesale mobile concessionaire. In this specific case, the Mobile Virtual Network Operator is **SERVITRON**.
- Wholesale Shared Network: The public telecommunications network licensed to Altán Redes, S.A.P.I. de C.V., exclusively for the wholesale commercialization of telecommunications capacity, infrastructure or services to other concessionaires or commercializers, including **SERVITRON**.
- Internet Access Service: A public telecommunications service that provides Internet connectivity to end users so they can access content, applications and/or services available on the Internet, through the exchange, upload and download of traffic under the Internet Protocol (IP).
- Wholesale Mobile Telecommunications Service: The mobile service consisting of providing access to individual elements, technical, economic, operational and commercial capabilities of a network or services,

including interconnection services, which are used by Mobile Virtual Network Operators to provide said services to mobile end users.

- URL: Uniform Resource Locator

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