

**INFORMATION
DISCLOSURE POLICY
GRUPO TRAXIÓN, S.A.B.
DE C.V.**

April 2019

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1. OBJECTIVE

The goal of this Information Disclosure Policy (the “Policy”) is to ensure, based on confidentiality and transparency criteria, that the shareholders, investors, and stakeholders of Grupo Traxión S.A.B. de C.V. (“Traxión” or the “Company”) receive through the appropriate channels the information they need, to strengthen their relationship with the Company.

Likewise, it ensures that we use clear procedures to correctly communicate with shareholders, investors, and stakeholders, and in this way preserve long-term relationships that are based on trust.

2. SCOPE

The Policy applies to all information pertaining to Traxión and its subsidiaries geared to its shareholders, investors, partners, clients, suppliers, and employees, as well as other stakeholders of relevance for the Company. The information refers to content from the different business divisions and activities—whether they are classified as confidential, or not, as needed or in order to comply with internal regulations.

3. REFERENCES, APPLICABLE DOCUMENTS AND POLICIES

3.1. Internal

- Traxión’s Code of Ethics.

3.2. External

- Securities Market Law.
- Code of Principles and Best Practices of Corporate Governance (Business Coordinating Council / BCC).

4. DEFINITIONS AND ABBREVIATIONS

Term	Description
a. Confidentiality	Information which only authorized parties can gain access to, based on a relationship of mutual trust and security and in compliance with certain internal codes and mechanisms.

Term	Description
b. Relevant Event	Any event that has or could have an effect on the price of Traxión's stock listed on the Registro Nacional de Valores (Mexican Securities Registry), as well as those included in Article 50 of the Disposiciones de Carácter General Aplicables a las Emisoras de Valores y a Otros Participantes del Mercado de Valores (General Stipulations Applicable to Securities Issuers and Other Participants in the Securities Market).
c. Stakeholders	Any group or individual that could have an effect on or be affected by the Company's operations, whether they have or not a contractual relationship with the Company.
d. Transparency	A practice aimed at increasing trust among parties that have a relationship with the Company, whether they are clients, investors, suppliers, partners, or employees.

5. RESPONSABILITIES

This policy is aligned with compliance standards that need to be observed before, during, and after an exchange of information takes place between Traxión or its subsidiaries and shareholders, investors, and stakeholders. In this task, the CEO, who is the party responsible for compliance with this policy, relies mainly on four departments:

1. Corporate Comptroller and Tax Department (including the Financial Information Department). Is the only authorized source for individual and/or consolidated financial information that is to be communicated to stakeholders. It is not authorized to issue any information without the prior approval of the Vice-President for Investor Relations and the CEO.
2. Operational Excellence Department. Is responsible for validating all relevant information regarding operations that is to be communicated to stakeholders.
3. Vice-President for Investor Relations. Is responsible for communicating operational and/or financial information to stakeholders, with the prior authorization of the CEO.
4. Corporate Communications and Institutional Relations Department. Is responsible for all communications with the media and other institutions, in accordance with Traxión's process for issuing relevant event notices.

The general standards to observe when communicating and/or publishing information include, but are not limited to, the following:

- Shareholders need to have access, with enough anticipation, to all the information required to analyze and adequately participate in the business decision-making process.
- Provide the necessary detailed information and documents to enable shareholders to exercise their rights.
- Traxión is responsible for ensuring an effective communication with its shareholders, through periodic reports and relevant communication releases.
- Establish the communication mechanisms needed to enable shareholders to gain adequate and timely access to business-related information.
- In order to ensure that all relevant information is communicated in a rigorous and timely manner, from a legal standpoint, we adhere to what is established in the Mexican Securities
- The Company's public or private information will be publicly available once it has been approved by Traxión's CEO.
- Relevant information related to Traxión and its subsidiaries will be disclosed by the Company, prior to the individual companies informing their own internal and external audiences.
- Information will be available within the appropriate time and form to improve transparency and quality and in order to better serve users and the business.
- Specific or private information will be communicated in such a way that it has no effect on the decision-making process and participation in the business, and it needs to be clear, truthful, correct, uniform, and simultaneous.
- Any information issued by Traxión will comply with applicable laws and regulations.
- For the Company to offer better service and improved accountability, contact data will be included in all information that is published or communicated, in order to address any concerns or situations regarding the information, if needed.

6. INFORMATION CATEGORIES

Traxión is committed to disclosing information in an open and transparent manner. However, there are legal and operational considerations that are

required to protect the interests of the Company and its clients, investors, shareholders, suppliers, partners, and employees. Accordingly, information that is not specific, confidential, or private will be deemed either as institutional, financial, or as related to our products and services, and will be communicated or made available as such to shareholders, investors, and stakeholders.

6.1. Institutional Information

Information on Traxión's description, structure, and business model; it is communicated to all stakeholders. Examples include:

- Board of Directors: Composition and members.
- Vision, Mission, and Values: Guiding pillars for the business.
- Internal Organization: History, statutes, and composition of Traxión's Departments and Divisions.
- Main Policies: Internal bylaws ruling over Traxión's activities, such as Traxión Code of Ethics, the Code of Ethics for Suppliers, and the Sustainability Policy, among others..

6.2. Financial Information

Information pertaining to the Company's financial results and statements; it is communicated more specifically to shareholders, investors, and partners.

- Corporate Acts: Periodic reports regarding agreements adopted by the governing bodies and notices issued in adherence to applicable corporate practices and legal stipulations.
- Quarterly Reports: Reports that include the company's financial statements as well as management's comments and analyses regarding operational and financial results.
- Annual Report: Information regarding the Company's main results, financial statements, achievements, and activities.
- Company Restructuring: Mergers, spinoffs, acquisitions, or asset sales approved by the Board of Directors.
- Relevant Events: Reports on relevant events in adherence to what is established in Article 105 of the Mexican Securities Market Law.
- Policies and Operations: Reports on the policies and operations included in Article 28, Paragraph III, of the Mexican Securities Market Law.
- Press Releases: Public communications on the Company's main results, achievements and/or summary of the financial statements.

6.3. Information about Services

Describes the services offered by Traxión; it is communicated particularly to clients and the public in general.

- About the Services: Includes a clear and specific description of each of the services offered by Traxión through its subsidiaries.
- Traxión Companies: A list of companies that make up Traxión.
- Service Channels: Detailed information on the in-person and remote channels through which clients and the public in general can contact the Company or ask for information.

7. COMMUNICATION CHANNELS

In order to comply with and promote the principles described in this Policy, Traxión offers several means and channels of communication and information through which it can correctly disclose the required information.

7.1. Internal

Information that is deemed relevant for stakeholders is collected from all departments in Traxión and coordinated internally.

7.2. External

Traxión's external communication channels are earmarked for the public in general and the Company's stakeholders. These include:

- Traxión website: The Company's main communication channel with its clients, investors, suppliers, partners, and the public in general is its website (<http://traxion.global>). Its content is periodically updated to include any information that could be of interest, favoring immediate publication and transparency, as a way of doing things in Traxión.
- BMV website: Since Traxión is a public entity, the Company's relevant information is available on the website of the Bolsa Mexicana de Valores, BMV, (Mexican Stock Exchange).
- Social Networks: Traxión believes in the importance of being at the cutting-edge of new information technologies and communication channels, which is why it is present on social networks.

8. LIMITATIONS

Traxión is obliged to communicate any relevant events as soon as it becomes aware of them. However, it can postpone communicating an event if the following conditions are met:

- I. The acts, facts, or events have not yet been consummated.
- II. There is no information on them available in mass communications media.
- III. There are no unusual variations in Traxión's shares price or volume, considering such unusual variations as any changes in the shares supply or demand, or in its price, that is not consistent with historic behavior and cannot be explained with information that is readily available to the public.

9. LIABILITY / OWNERSHIP

The Corporate Legal Department is the assigned owner of this policy and is mainly responsible for its content, updating and request for approval by Traxión's Corporate Governance.