

ETHICS AND INTEGRITY DUE DILIGENCE RENEWAL QUESTIONNAIRE

Due Diligence is a mandatory process that PMI personnel must carry out to all their commercial counterparts, through this questionnaire to prevent risks such as: corruption, bribery, money laundering and terrorist financing in Trade Agreements and, where appropriate, the opportunities for improvement that allow mitigating such risks.

For PMI, the relationship with our counterparts is very important. With the Due Diligence process we seek to ensure that operations are carried out within a framework of ethics and corporate integrity in accordance with the best international practices, for which PMI also complies with the Due Diligence processes that its counterparts practice.

In PMI, a ZERO TOLERANCE TO CORRUPTION policy has been implemented. If any worker of PMI or person who mentions that he works for or on behalf of PMI has requested or offered any benefit, bribe or gift of any kind, actions shall be taken to impose appropriate disciplinary measures. Please report it to the Ethics Help Line at comitedeetica@pmicim.com. PMI has implemented a policy of NO RETALIATION.

Validity of Due Diligence.

In accordance with company policies, Due Diligence is valid for two years.

Confidentiality of information.

The information provided by the counterparties will be confidential, so it will be always protected and will only be used exclusively for the purposes discussed herein.

Counterparts may at any time request, prior to filling out this Questionnaire, the signing of a confidentiality agreement.

PMI is committed to:

- a) Maintain the confidentiality of the information.
- b) Do not disclose the content of the information to third parties, individuals, or legal entities
- c) Do not use the information directly or indirectly for its own benefit or the benefit of third parties, except for the purposes mentioned in the Questionnaire.
- d) Do not fully or partially disclose to any third party the information obtained as a direct or indirect consequence of this Questionnaire.
- e) Do not send to third parties the information shared through email or other means to which PMI has access in connection with the completion of this Questionnaire.

However, the provisions of subparagraphs a, b, c, d and e, the obligation of confidentiality shall not apply to:

- (i) information in the public domain that has not been made public through the breach of confidentiality of this Questionnaire.
- (ii) information that has been obtained prior to its disclosure without violating any obligation of confidentiality of this Questionnaire.

(iii) information obtained from third parties who have the right to disclose it without violating an obligation of confidentiality of this Questionnaire.

(iv) information that must be disclosed as required by law or as required by governmental authorities, if failure to disclose it would subject the requested party to civil, criminal, or administrative penalties, provided that the requested party promptly communicates to the affected party the request for such disclosure.

Ownership of Information.

The information received by PMI is and will remain the exclusive property of the party that owns and originates the information.

Term.

The period of confidentiality protection will be the same as the validity of the Due Diligence, counted from the moment the Questionnaire is received by PMI CIM to the email SolicitudDD@pmicim.com

At the end of the term PMI will proceed to destroy or eliminate the information in its entirety from its files.

Non-exclusivity.

This Questionnaire should not, under any circumstances, be interpreted as the implementation of a collaboration or association grouping, a joint *venture*, a consortium or cooperation agreement, a partnership or organization of persons, an associative contract or other similar legal transaction, a trust or a fiduciary relationship, nor shall it generate for any of the parties the obligation to contract or constitute any of the aforementioned modalities of association or linkage or the signing of any contract, agreement or legal instrument.

INSTRUCTIONS FOR FILLING OUT THE QUESTIONNAIRE:

- If not filled out by the agent, legal representative, or compliance officer, indicate the name and position of the person who prepares the questionnaire, which shall be endorsed by the legal representative or agent or compliance officer.
- Please answer all questions truthfully.
- If you notice that your company does not meet characteristics, required information, or observe any problems in terms of ethics and integrity, please inform us, once our staff reviews the information, will guide you on the alternatives how you can address those situations that could represent a risk to your representative or to Pemex and its Companies. Please note that this questionnaire is a tool to prevent the materialization of corruption Acts in the Commercial Agreements executed with PMI by identifying weaknesses in the matter of ethics and integrity.
- If you consider that the question is not applicable to you, please clarify: "DOES NOT APPLY", but please don't leave blank spaces.
- If you don't want to respond, please clarify, "I DON'T WANT TO RESPOND" and please indicate the reasons.
- You can attach PDF files as part of the information you respond to, whenever you wish to.
- Being owned by the Federal Government, most of the information held by Pemex and its Companies is public. If you believe that any information you provide is confidential, please specify it in any available comments section.
- Once the questionnaire is completed and delivered to our staff, please contact us for feedback on possible areas of opportunity identified that need to be strengthened.

Glossary and references in the questionnaire:

Final Beneficiary	It refers to the last holder, or to the person or group of people who control a Company.
Intermediaries	People who are not employees of your company, hired to conduct procedures or procedures related to the Commercial Agreement with any area of the Mexican Government.
Members of senior management	Consider the director, manager, administrator, financial officer, and project manager of your company, or those performing similar functions
Pemex	May mean, without distinction, Petróleos Mexicanos, its Subsidiary Productive Companies or Affiliated Companies
PMI	May mean, without distinction, PMI Comercio Internacional, S.A. de C.V., PMI Trading DAC, PMI Trading México, S.A. de C.V., PMI Norteamérica, S.A. de C.V., PMI Ducto de Juárez S. de R.L. de C.V., PMI Holdings Petróleos España S.L., Holdings Holanda Services B.V.
Politically Exposed Persons	Consider any person who holds public office in Mexico or abroad.
Public officer	They are people who hold a position in the Government of their country or in the Mexican Government.

Vulnerable Assets	The habitual and professional offering of exchange of virtual assets by entities other than Financial Entities, carried out through electronic, digital or similar platforms, which they administer or operate, facilitating or carrying out purchase or sale operations of said assets owned by their clients or, provide means to custody, store, or transfer virtual assets other than those recognized by the Bank of Mexico in terms of the Law to Regulate Financial Technology Institutions.
Real Estate Development	The habitual or professional provision of real estate development, in which operations of purchase or sale of the assets themselves are involved on behalf of or in favor of clients of those who provide such services.
Games and Raffles	Activities related to games of chance, contests, or raffles, such as: The sale of tickets, tokens or any other similar type of voucher. The payment of the value of said tickets, tokens or receipts. The delivery or payment of prizes. The carrying out of any financial operation.
Service and Credit Cards	The issuance or marketing, on a regular or professional basis, of service or credit cards that are not issued or marketed by Financial Entities.
Prepaid Cards and Coupons	The habitual or professional issuance or marketing of prepaid cards, vouchers or coupons, whether printed or electronic, that can be used or redeemed for the purchase of goods or services, and that are not issued or marketed by Financial Entities.
Return and Reward Cards	The habitual or professional issuance or marketing of electronic wallets, certificates, or coupons, in which, without a prior deposit from the holder of said instruments, resources are credited to them from prizes, promotions, refunds or commercial rewards, and can be used for the acquisition of goods or services in establishments other than the issuer of said instruments or for the withdrawal of cash through ATMs or terminals, points of sale or any other means.
Traveler's Checks	The habitual or professional issuance and marketing of traveler's checks, other than that carried out by Financial Entities.
Loans, Credits and Mortgages	The habitual or professional offering of loans, guarantees or the granting of loans or credits, with or without collateral, by entities other than Financial Entities
Real Estate	The habitual or professional provision of services related to the construction or development of real estate, or the intermediation in the transfer of ownership or the creation of rights over such assets, in which operations involving the purchase or sale of the assets themselves are involved, on behalf of or in favor of the clients of those who provide such services.
Metals and Jewelry	The habitual or professional commercialization and intermediation of precious metals, precious stones, jewelry, or watches.
Artworks	The usual or professional auction or marketing of works of art.
Vehicles	The habitual or professional marketing or distribution of vehicles, whether new or used, including airplanes, boats, and land vehicles.
Securities Transfer and Custody	The habitual or professional provision of services for the transfer or custody of money or securities, with the exception of those involving the Bank of Mexico and institutions dedicated

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This questionnaire must be completed by the Third Party itself and must be answered in its entirety in full with handwritten signature or by any digital means.

1. General information.

By signing this questionnaire, I declare under oath of truth, that I have carried out the necessary procedures and consultations to ensure that the answers provided in this document are truthful and complete.

Prepared by:

(Name)

Position:

Signature: _____ Date: _____

Phone cell: _____ Phone Number: _____

Email:

Full legal name:

Country, date of incorporation and registration of the natural or legal person:

Turn of the company or corporate purpose:

Conventional address:

Tax Address:

Country(ies) where you conduct your business or services:

Phone: _____ Web Site: _____

1. Write down all the names under which the third party has carried out business, including affiliate or subsidiary companies, indicating the period for each one:

Name	Period

2. In the case of legal entities, provide a list of the shareholders who have more than 10% and their nationality.

Name	%Percentage	Nationality

3. Explain what the legal structure of the company is (e.g., controlled or controlling company, subsidiary, affiliate, etc., in which case you must relate the group structure) until you reach to the last holder or beneficiary. If the information is extensive, please place it at the end of the document.

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4. If there is, specify who are the members of the board of directors of your organization.

Name	Charge	Nationality	Year of Birth

5. Indicate who are the main senior management members of your organization.

Name	Charge	Nationality	Year of birth

6. Indicate the country(ies) where your company will obtain the resources (financial and material, if applicable) for this Commercial Agreement?

7. Which subsidiaries or other organizations will participate with your company in the proposed project/association, if applicable? In case it does not apply indicate N/A

Name	Relation	Activity

8. Write down the details of the people who will be responsible for working with P.M.I. Trading Designated Activity

Name	Charge	Nationality	Year of Birth

9. If you plan to use intermediaries or other people who are not part of your organization, to carry out procedures or services on behalf of or in favor of P.M.I. Trading Designated Activity Company, before other public servants in Mexico or public officers abroad, identify the name(s) and address(s), the relationship with you, and the activities that will be carried out. Otherwise, check "NO".

NO ☐

Name	Relation	Activity

10. Bank Account Information:

Account beneficiary	Bank	Account registration country

11. Do any of the bank accounts have a beneficiary that doesn't match your company name?

Yes ☐ No ☐

Reason? _____

12. Are any of the bank accounts registered in a tax haven or in a sanctioned bank or country?

Yes ☐ No ☐

Reason? _____

SECTION I:

1. Indicate if any of your employees, shareholders, or members of your upper management a "public servant or public officer"?

Yes ☐No ☐

If yes, please provide a list of the government offices where your employees, shareholders or members of your upper management are public servants or public officers, as well the position and the period of functions in government.

Name	Charge/Government Position	Period

2. Indicate if any of your employees, shareholder, or member of upper management of your company are related (by relationship, blood relationship, affinity; or by business associations or investments, etc.) currently or in the past (last 24 months) to a "public servant or public officer"?

Yes ☐No ☐

If yes, describe the relationship between that person and the public servant

Name of Employee/ Shareholder / Officer	Relationship with the Public or Officer or public officer	Name of public servant or Public officer

3. Does the company, any of its affiliates or subsidiaries belong in whole or in part to a "public servant", or a person related to one of them, whether as a shareholder, investor, partner of the organization, or of any other person, or of any other person? another way?

Yes ☐

No ☐

If yes, indicate the name of the "public servant", and his total share as a percentage.

Name of Public Servant or Public Officer	Type of Link (Shareholder, Investor, Partner, Etc.)	% Participation

SECTION II

1. Does any of your key Employees or member of the senior management of your organization provide or will provide financial or other benefits to any employee, agent and/or representative of PEMEX, its subsidiary productive companies and/or affiliated companies; or to any server or public officer or a member of the his family (e.g. educational or medical assistance, housing)?

Yes ☐

No ☐

If yes, please explain. Provide a list of all benefits granted, the name of all recipients of such benefits, and their relationship to the "public servant" (e.g., cousin, sister, etc.).

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Name of public servant or the employee, representative and /or agent of PEMEX, its subsidiary productive companies and / or its affiliated companies	Name of the family member of the server or public officer or of the employee, representative and / or attorney of PEMEX, Its subsidiary productive companies and /or its affiliated companies	Family bond	Benefit granted or to be granted

2. Indicate if any public servant, employee, attorney and / or representative of PEMEX, its subsidiary companies and / or affiliates companies, any public servant or public officer or a member of the family of the aforementioned have any interest, or will benefit in any way, as a result of the Commercial Agreement?

Yes ☐No ☐

If yes, please explain:

3. Have you, or any key Employee or member of your organization's senior management, been convicted of a money laundering, fraud, or corruption offense in any country, including where the Trade Agreement will be developed or are there any legal proceedings of this nature pending?

Yes ☐No ☐

If yes, describe the charges for which you or key members of your organization have been convicted or are currently pending proceedings, and when happened.

4. Is there any pending litigation or legal process against your organization, or any key employee or member of senior management, initiated by any government entity of any country including in which the Trade Agreement will be developed, the outcome of which could affect you?

Yes ☐No ☐

If yes, please explain.

SECTION III

1. Does your organization include anti-corruption clauses in your contracts with your third parties?

Yes ☐

No ☐

2. Does your organization have a personal data protection policy?

Yes ☐

No ☐

3. Does your organization have a protection policy for its information systems?

Yes ☐

No ☐

4. Does your organization carry out any of the following activities: Virtual Assets, Development Real estate, games and raffles, Service and credit cards, Prepaid cards and coupons, Refund and rewards cards, Traveler's checks, Mutual, loans or credits, Shielding, Real estate, Metals and jewelry, Works of art, Vehicles and Transfer or custody of securities (Check Glossary)?

Yes ☐

No ☐

5. Does your organization have a social responsibility policy?

Yes ☐

No ☐

6. Does your organization have an environmental responsibility policy?

Yes ☐

No ☐

7. Does your organization have a human rights policy?

Yes ☐

No ☐

8. Do you have internal controls (organization manuals and procedures that regulate your functions, risk assessment, communication)?

Yes ☐

No ☐

9. Have you sued PEMEX or PMI in the past?

Yes ☐

No ☐

END OF THE QUESTIONNAIRE