

ETHICS AND INTEGRITY DUE DILIGENCE 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	Services for the transfer or custody of money or securities.

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Important.

Before filling out the questionnaire, please read the regulations and ethics, conduct and anti-corruption applicable to PMI, in the following link: <https://www.pemex.com/en/compliance/Paginas/default.aspx>

1. General information.

By signing this questionnaire, I state under protest to tell the truth that I have conducted the necessary procedures and consultations to ensure that the answer provided are truthful and complete.

Prepared by (name and surname) _____

Position: _____

Signature: _____ Date: _____

Telephone: _____ Cell phone: _____

Email: _____

2. Company information.

Name or legal name: _____

Country of registration or incorporation: _____

Line of business: _____

Countries where the Company conducts business (commercial or services activities).

Address: _____

Fiscal Address:

Tax ID (RFC) _____

Telephone: _____ website: _____

SECTION I

1. Do you know the name of the Final Beneficiary of the Company?

Yes

No

If yes, indicate who is or who are they:

2. What names your Company has had over the time. In the past your Company have had other names or have done business with PMI under other names. Even if the Company has only changed the name. (Consider, if applicable, the last 10 years)

Name	Period

3. In case of legal entities, provide a list of the shareholders who have more than 10% and their nationality. If none of the shareholders have 10% or more, please name the 5 most important shareholders.

Name and surname	Percentage	Nationality	Year of Birth

4. Explain what the legal structure of the Company is (i.e., controlled or controlling Company, subsidiary, affiliate). You must relate the structure of the group until the last holder of the Final Beneficiary.

5. If any, specify who are the members of the board of directors of your organization. (Governing body, governing board or any other).

Does Not Exist _____

Name and surname	Years of Service	Job Position Title	Nationality	Year of Birth

6. Indicate who are the principal senior management members of your organization (Director, administrator, financial officer, compliance officer and project manager).

Name and Surname	Years of Service	Position	Nationality	Year of Birth

7. Indicate the countries where your Company will obtain the resources (Financial and material, if any) for the potential Commercial Agreement with PMI?

8. Is the country specified on the previous question restricted or financially sanctioned by any other country or international body? You can check the list of sanctioned countries in the link below:

<https://www.treasury.gov/resource-center/sanctions/Programs/Pages/Programs.aspx>

Yes

No

9. If applicable, what are the subsidiaries or other organizations that will participate with your Company in the potential Commercial Agreement? Please specify.

Yes

No

Name	%	Relationship	Activity

10. Is the industrial sector which your Company belongs is any of the following: Transportation, education, health, oil, and gas in any of its processes.

Yes

No

11. Indicate the people who will be working with PMI?

Name and surname	Years of Service	Position	Nationality	Year of Birth

12. Have you previously entered into a Commercial Agreement with PMI?

Yes No

If applicable, please indicate the year when you entered to these agreements with PMI and list the five previous commercial relationships:

Contract Number	Year

13. Have you ever filed lawsuits or filed legal procedures against PMI or Pemex in the past?

Yes No _

14. If you plan to use intermediaries or other people other than your own employees to carry out procedures or services on behalf of or in favor of PMI, with public organizations in Mexico or abroad, please identify the name, address, and the activities they will carry out. Otherwise, indicate the no. with an "x".

No _____

Name and surname	Address	Activity

15. Do all your employees, regardless of their level of responsibility, work under contract and receive benefits in accordance with the law?

Yes No

16. Are any of your key employees, shareholders, or Members of your company's senior management (are) or (were) public officials?

Yes No

17. If so, please provide details of the government office, position and for how long have they held that position.

Name and surname	Government office / position	Period

18. Are any of your key employees, shareholders, or members of the top management of your Company related by kinship, by consanguinity or affinity up to the fourth degree or by business associations or investments; currently or in the past (last 12 months) to a "public officer"? In the case that the relationship is with the President of the United Mexican States, it must be reported regardless of the degree of kinship.

Yes

No

If so, describe the relationship between that person and the public officer:

Name and surname	Relationship with the public officer	Public officer name

19. Does your company, any of its affiliates or subsidiaries belong in whole or in part to a public officer or a person related to one of them, either as a shareholder, investor, partner or in any other way?

Yes

No

If so, please indicate the name of the public officer and his/her total participation as percentage.

Public officer name and surname	Type of relationship (Shareholder, investor, partner)	%

20. Does your organization support and respect the protection of fundamental, internationally recognized human rights within the sphere of influence?

Yes

No _

21. Does your company promote and encourage the elimination of all forms of forced compulsory labor?

Yes No

22. Does your company promote and implement the eradication of child labor?

Yes No

23. Does your company promote and enforce the abolition of discriminatory practices in employment and occupation?

Yes No

24. Does your company ensure a preventive approach that favors the environment?

Yes No

25. Bank account information:

Bank	Account	Beneficiary	Currency	Account registration Country

26. Do any of the bank accounts have a beneficiary that does not match the name of your Company?

Yes No

If yes, explain

27. Are any of your bank accounts are registered in an offshore location or in a sanctioned bank or country?

Yes No

If yes, explain

FEATURES OF THE INTEGRITY OF COMPLIANCE PROGRAM:

Features	Yes	No	In Process
1. Do you have an Ethics Code?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
2. Do you have a Code of Conduct?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3. Do you have an Anti-Corruption Policy?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
If your response was "No" in any of the three previous questions, kindly respond to the subsequent question. Otherwise, proceed to question number 5.			
4. Do you agree to adhere to Pemex's Code of Ethics, Code of Conduct and Anticorruption Policies.	<input type="radio"/>	<input type="radio"/>	
5. Does the policy or codes that regulate them include the following characteristics:			
• Transparent regarding donations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
• They are public.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
• They are extensible to its stakeholders, related parties, suppliers, and others.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
• Transparency in terms of political contributions.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
• They establish the prohibition to offer or receive bribes.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
• They establish the prohibition to offer or receive incentives of any kind for processing or facilitation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
6. Do you provide training to your staff on issues related to fighting corruption?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7. Do you have any internal mechanism to report issues related to corruption?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
8. If a complaint is received, do you follow up? If yes, can you mention any internal mechanism to follow up such complaint?	<input type="radio"/>	<input type="radio"/>	
9. Do your senior managers speak clearly on issues of corruption and employee responsibility?	<input type="radio"/>	<input type="radio"/>	
10. Are you aware that in PMI it is prohibited the illegal conversion, concealment, or transfer of money property?	<input type="radio"/>	<input type="radio"/>	

11. Are you aware of and willing to comply with the anti corruption laws and regulations that are applicable to the Commercial Agreement?	<input type="radio"/>	<input type="radio"/>	
12. In case of your knowledge, will you notify PMI, if any of your key employees, partners, directors, or shareholders of your company have a relationship with Mexican Government officials? Will you also notify in case such a situation arises during the term of the potential Commercial Agreement?	<input type="radio"/>	<input type="radio"/>	
13. Will your company comply with national and international provisions prohibiting money laundering and the financing of terrorism?	<input type="radio"/>	<input type="radio"/>	
14. Does your company accept that PMI, by itself or through a Third Party, may obtain an opinion on its compliance with ethics, corporate integrity, anti-corruption, prevention of money laundering and financing of terrorism and that it will provide the necessary assistance?	<input type="radio"/>	<input type="radio"/>	

SECTION II

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

Yes No I don't know _

If yes, please provide a list of the employees who are public servant, and the positions held, as well as for how long the person holds or held those functions in government.

Name and surname	Government Position title	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 officer.

Yes No I don't know _

If yes, describe the relationship between that person and the public officer.

Employee name and surname/ Shareholder / Executive	Relationship with public officer	Name and surname of public officer

3. Does the company, any of its affiliates or subsidiaries belong partially or totally to a public officer or a person related to one of them, whether as a shareholder, investor, partner of the organization, or of any another way?

Yes No

If yes, provide the name of the public officer and its total participation (%).

Name and surname of the public officer	Relationship type	Participation %

4.- Is it lawful your participation in the potential Commercial Agreement with PMI?

Yes

No

5. If, to conclude the potential Commercial Agreement your company requires any permit, certification, registration, license, or authorization issued by an authority, are those permits valid and in compliance with the applicable regulations?

Yes

No

Is not required _

6. Describe the characteristics of your organization's integrity program (compliance and corporate ethics) and provide copies and/or descriptions of your Code of Ethics and Conduct; anti-corruption compliance policies, compliance training activities, and reporting channels, if any.

7. Is there any litigation or legal process pending against your organization, or any key employee or Member of senior management, initiated by any governmental entity of any country including that of the potential Commercial Agreement, the outcome of which could affect said agreement?

Yes

No

If yes, please explain.

8. For the potential Commercial Agreement with PMI, do you use, or will you use, intermediaries for procedures, transactions or permits in government offices?

Yes

No

9. If your answer is yes; does your Company establishes with those intermediaries the commitment that they will avoid acts of corruption in their efforts in government offices for the potential Commercial Agreement?

Yes

No

If yes, please explain.

10. Do you operate in other countries?

Yes

No

If yes, please indicate where:

11. Does your company comply with the Anti-Corruption Laws and Obligations of your country of origin and the countries where you operate?

Yes

No

12. Does any of your key employees or senior management member of your company provide or will provide financial or other benefits to any PMI or Pemex employee, government official, or family member of a government official (e.g., educational, or medical assistance, housing), i.e., Politically Exposed Persons?

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 officer (e.g., cousin, sister, etc.)

Name of public officer, Politically Exposed Person, or PMI employee	Name of the family member of the Politically Exposed Person, public officer, or PMI employee	Family bond	Benefit granted or to be granted

13. Does any employee of PMI or Pemex, any public officer, or a member of their family, have an interest, or will they benefit in any way, because of the potential Commercial Agreement?

Yes

No

If yes, please explain.

14. Does your organization have a corporate policy that prohibits facilitation or management payments?

Yes

No

If no, please explain under what circumstances does your policy allow these kinds of payments?

15. Does your organization have policies and procedures for entering contracts or relationships with Third Parties?

Yes

No

16. If so, are anti-corruption clauses included?

Yes

No

SECTION III

1. Have you or any key employee or member of the senior management of your organization been convicted of a felony of a fiscal, financial or corruption nature, in any country, including where the potential Commercial Agreement will be developed?

Yes

No_

If so, describe the charges for which you or key members of your organization have been convicted and when it occurred.

2. Does your company or any of its key employees have any pending legal proceedings related to a tax, financial or corruption crime in any country, including where the potential Commercial Agreement will be developed?

Yes

No_

If so, please explain.

3. If any allegations or indications, disseminated by authorities or the press, that involve the personnel of your organization in alleged acts of corruption, money laundering or other unethical behavior exist, is there any protocol or internal procedure regulated to investigate the allegations?

Yes

No_

If so, please explain.

4. Select who the Anti-Corruption Policy applies to within your company if you have it:

All employees, including Senior Management Members and Directors.	Yes	No
Partners	Yes	No
Suppliers	Yes	No
Strategic Partners	Yes	No

5. Does your company make donations in cash or similar, to the local, or federal government?

Yes

No

If so, please explain to whom they are granted and how your company regulates the delivery of these resources:

6. Does your company make contributions to political parties or candidates?

Yes

No

If so, please explain to whom and how your company regulates the delivery of these resources:

7. Does your company have any strategy or policy focused on information security (Protection of computer systems) aligned with organization objectives.

Yes

No

If so, how often are they reviewed and updated?

8. Does your company have an internal control policy that includes risk management?

Yes

No

If so, explain what methodology you use. If not, explain why a was not considered necessary.

9. Do you have any current or recent reviews, verifications or certifications by any external firm related to your company's legal compliance?

Yes

No

If so, please explain.

10. Has your company had any fines because of violations of the regulations on the prevention of money laundering or terrorist financing in the last five years?

Yes

No

If so, please explain.

11. Does your organization engage in any of the following activities?

Virtual Assets, Real Estate Development, Games and Raffles, Service and Credit Cards, Prepaid Cards and Vouchers Gift and Reward Cards, Traveler's Checks, Mutual Funds, Loans or Credits, Collateralized Loans, Real Estate, Metals and Jewelry, Artworks, Vehicles or Transfer or Custody of Securities.

Yes

No

If so, please explain.

12. Does your organization have a social responsibility policy?

Yes

No

END OF QUESTIONNAIRE