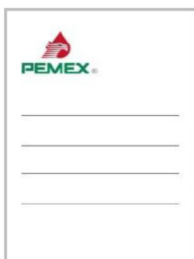




Code of Conduct of Petróleos Mexicanos, its Subsidiary Productive Companies and, where applicable, Affiliate Companies.





*Property of Petróleos Mexicanos
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AUTHORIZATION SHEET

Prepared by

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Revised by

Revised by

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Authorized by

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 Octavio Romero Oropeza
 General Director

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| Term | Definition |
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| Code of Ethics | Code of Ethics of Petróleos Mexicanos, its Productive Subsidiaries and Subsidiary Companies |
| Ethics Committee | Ethics Committee of Petróleos Mexicanos, its Productive Subsidiaries and, if applicable, Subsidiary Companies |
| Ministry of Public Administration Guide | Guide for the elaboration and update of the Code of Conduct for the dependencies and entities of the Federal Public Administration, as well as for the Productive Companies of the State. |
| LE | Ethics Hot Line for Petróleos Mexicanos and its Subsidiary Productive Companies and Affiliate Companies |
| Pemex | Petróleos Mexicanos |
| SCH | Undersecretary of Human Capital |

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- ## 11.4. Gifts and Invitations

Receiving or giving gifts, entertainment, compensation, entertainment or other goods, services or favors may create a conflict of interest. By "gifts, entertainment, compensations, invitations or other type of goods or favors" we understand any instance of value involving a gift, product, tickets for events of any nature, discounts, travel, lodging, prizes, transportation, use of vehicles or property, bonds, money, shares, gift certificates or any goods or services paid by a third party that maintains or intends to establish a business relationship, obtain a personal benefit, advantage or benefit in favor of a third party, or compromise our ability to make objective decisions in favor of Pemex and its companies.

Your obligation:

- Not to accept, offer, promise, or make payments or deliveries of any kind of value intended to obtain undue advantage or benefit.
- Restrictions on the receipt or delivery of money, securities, personal or real estate property, which may represent a conflict of interest, apply to you, your spouse, any person with whom you are related without limit of degree and third parties with whom you have professional, employment or business relationships.
- Invitations to events can only be accepted if:
 - 1) There is a clear business reason for Pemex and its companies;
 - 2) The expenses generated by transportation, lodging and other individual expenses are covered by Pemex and its companies, and
 - 3) You have the prior written authorization of a supervisor.

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- Comply with the regulatory framework on handling, disposal, classification and transparency of information, as well as the protection of personal data, established by Pemex and its companies and by the competent authorities.
- Accurate and reliable business and financial records.
- Keep the electronic records in an orderly manner with their respective files and records.
- Verify the sources of information so that the data used is truthful, timely, accurate and legal.
- Not to falsify, omit, misrepresent, alter or conceal any information, or misrepresent the facts in a record of Pemex and its companies.
- Do not participate in another person's attempts to conceal, destroy or alter information.
- Do not hide information about our work from superiors, colleagues, peers and staff in our charge, all our activities must be aimed at meeting the established business objectives.

Pemex and its companies have a policy of zero tolerance in the consumption of drugs and alcohol, so it is not allowed the use, possession, sale, attempt to sell, transport, distribution or manufacture of drugs or alcohol, while developing activities within the facilities or vehicles of Pemex and its companies.

- Do not use any type of intoxicating substance within the facilities and vehicles of Pemex and its companies, this prohibition also applies to business trips or external activities, while representing Pemex and its companies.
- Report to work free from the effects of any intoxicating substance.
- Do not encourage others to use prohibited substances, such as drugs and alcohol.
- Immediately report any person who consumes, or is under the influence of any toxic substance, as it represents a risk for the development of the functions and the security of the personnel.

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Sexual Molestation: A form of violence with a lascivious connotation in which, although there is no subordination, there is an abusive exercise of power that leads to a state of defenselessness and risk for the victim, regardless of whether it is carried out in one or several events.

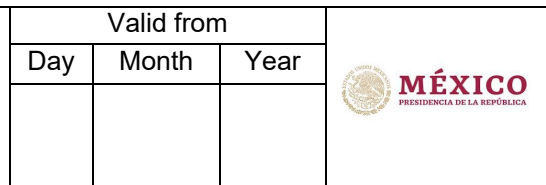
- Understand No means No, when a physical approach or sexual behavior is not desired or requested by the other person.
- Avoid unwanted behaviors, signs, contacts, insinuations, rumors, obscene language, jokes, compliments of connotation or with sexual intent, as they are prohibited and will be sanctioned.
- Do not condition promotions and promotions on changes in behavior or favors of a sexual nature.
- Refrain from showing or sending images of a sexual nature.
- Respect the privacy of others.
- Conduct yourself with unrestricted respect for people's bodies and clothing.

We understand Mobbing as any negative behavior between hierarchical superiors and inferiors or between peers in a work organization, as a result of which another person is subjected to direct or indirect attacks, over a period of time and continuously.

At Pemex and its companies, we show respect for all people. It is prohibited to participate in any action that may make another person feel threatened, humiliated or unsafe; such as verbal assaults, threats or any expression of hostility, intimidation or aggression.

- Avoid behaviors that intimidate or humiliate others.
- Do not intimidate, harass, unnecessarily expose people's mistakes or perform any other form of harassment against them.
- To create an environment that allows the personal, professional and family development of all those who work at Pemex and its companies and for those who relate to us.

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- Under no circumstances may senior management require a subordinate to carry out actions that are unrelated to the needs of Pemex and its companies. It is not permitted to exert pressure to force personnel to perform a certain act that does not correspond to the functions inherent to their position.
- Avoid making jokes about inappropriate comments, if you are not sure if something is appropriate or not, you should assume that it is not.

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It is a violation of this Code to make an accusation or report it knowing that it is false.

It is the obligation of all Pemex personnel and its companies to comply with the provisions of this Code, in accordance with the Code of Ethics and Article 134 of the Federal Labor Law.

It is the obligation of all staff and other responsible parties to participate and cooperate fully and honestly with any investigation of a violation of this Code.

The consequences of not complying with the contents of this Code, in addition to the above-mentioned labour sanctions, may lead to administrative, civil, commercial or even criminal actions or sanctions, which will be applied by the competent authorities. The foregoing is without prejudice to any actions that may be taken by other authorities.

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| First: | This Code shall enter into force on the day following its publication in the Federal Official Gazette. |
| Second: | With the entry into force of this Code, the Code of Conduct of Petróleos Mexicanos, its Subsidiary Producing Companies and, if applicable, Subsidiary Companies, in effect as of August 29, 2017, is void. |

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