

— PPI CODE
OF
ETHICS

PEMEX
Procurement
International
Inc.

PPI



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1. OUR CODE OF ETHICS

In this code, we reflect the corporate culture, values and principles which rule our conduct and represent a guideline for decision making in our actions. Acting in an integral and ethical way we generate value as a company and we maintain the trust between us and others: with partners, investors, clients, suppliers, contractors, service providers and with the society with whom we relate.

1.1 What is Ethics?

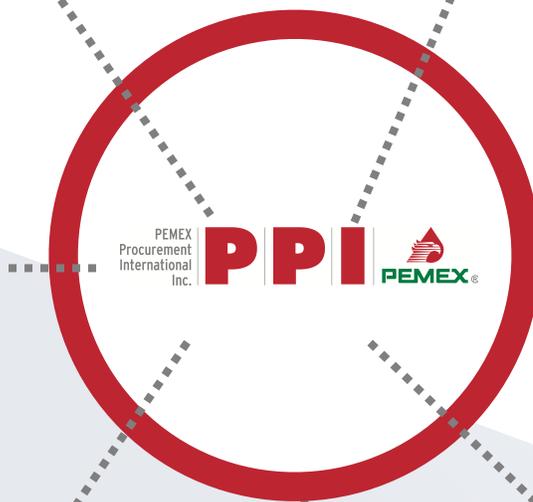
For PPI, ethics are the values and principles governing the performance of those of us who make up PPI. It is the set of rules and criteria guiding us and establishing the correct and accepted behaviors within the company.

1.2 WHY IS IT IMPORTANT TO APPLY THIS CODE?

It helps strengthen PPI's image and credibility.

It helps in making decisions by harmonizing our ethical principles, identifying which criteria are considered as correct by our company, and lining up with them.

It contributes to PPI's being more competitive, reliable and honest.



It supports the construction of solid and lasting business relationships with third parties who share our philosophy of ethics and integrity.

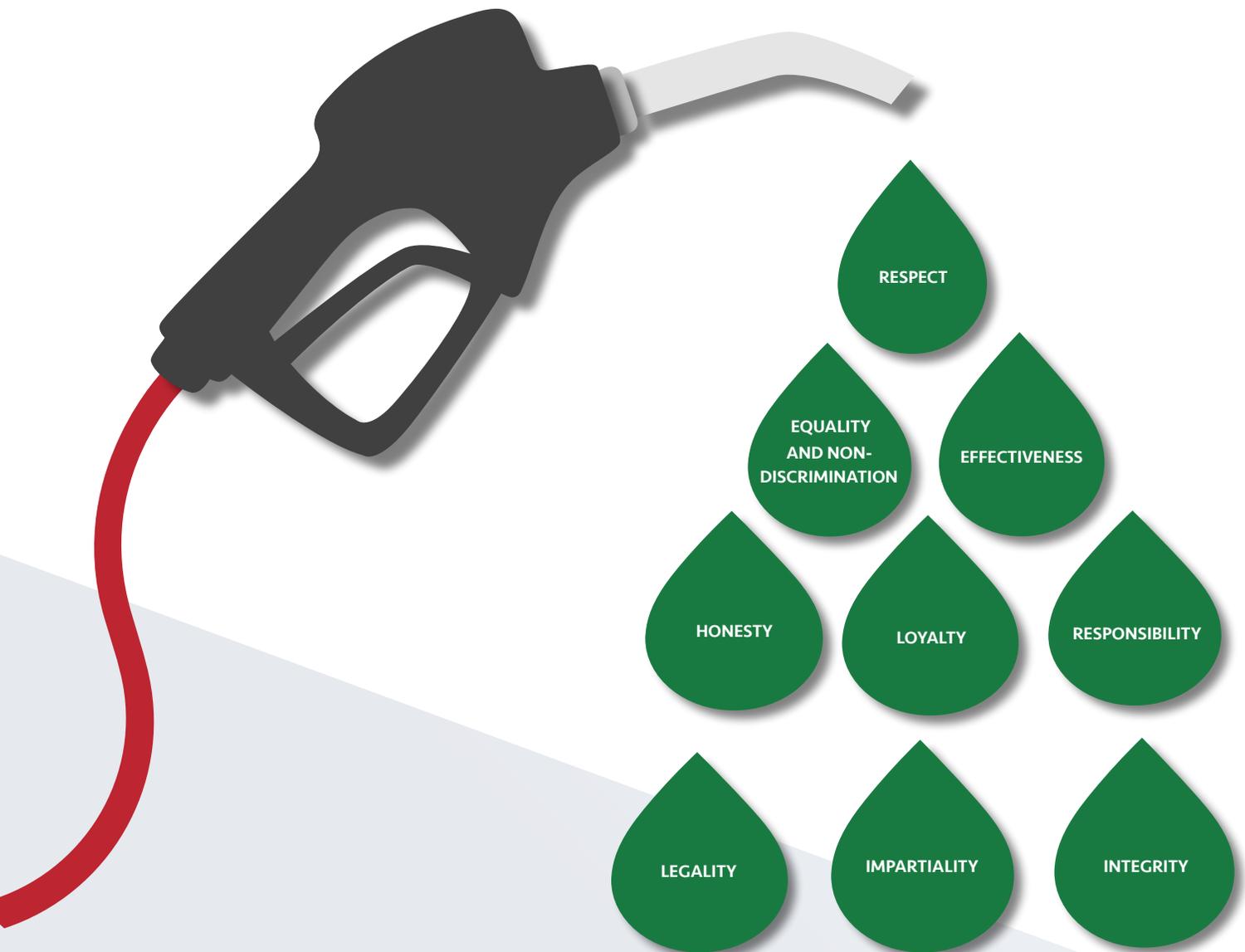
It reduces risks of possible losses by not complying with business objectives.

It strengthens PPI's ethical culture.

It creates a better coexistence and work environment.

2. ETHIC PRINCIPLES

In PPI, we have defined nine principles which will help us to fulfill our mission and which must be reflected in our daily actions:



2.1 Respect



It is to recognize our value, rights and obligations, as well as those of other people. It allows personal, professional and family development and contributes to improving the working environment and our daily coexistence. In PPI, we develop our activities with respect, consideration and care towards the people, communities, environment, companies and governments with whom we interact.

Some examples on how we live respect in PPI:

- By treating all people with dignity.
- By respecting one another's' time, being punctual with working hours and scheduled meetings.
- By avoiding physical or verbal expressions and attitudes which violate the dignity, or harm the physical, sexual or psychological wellbeing of others.
- By promoting the balance between personal, professional and family life.
- By caring for the environment and ensuring its conservation.

2.2 Equality and non-discrimination



It is treating all people in the same way, acting in an appropriate and cordial manner, without partiality, exclusion, restriction or preference.

Why are equality and non-discrimination important for PPI?

Because they ensure that all personnel can have access to the programs, benefits, jobs, charges or commissions within the company with the same conditions, possibilities and opportunities, depending only on their merit, work and daily effort.

Some examples of how we live equality and non-discrimination in PPI:

- By adopting inclusive attitudes.
- By ensuring equal treatment in work conditions.
- By encouraging without partiality, the development of skills and abilities.
- By not making fun, inappropriate comments or discriminatory jokes.
- By understanding that we are different and that is where the richness of diversity lies.
- By recognizing well-directed effort

2.3 Effectiveness

It is making use of our capacities and resources (time, energy, work tools, personnel, supplies, etc.) in an optimal way to achieve PPI's objectives.

Why is effectiveness important for PPI?

Because it helps to strengthen our internal processes and increase the competitiveness of the company.

Some examples on how we live effectiveness in PPI

- By conducting our activities in time, and form, with quality.
- By teamwork.
- By optimizing the time in our workday to generate profits for the company.
- By considering our actions for the greater benefit of the company.

2.4 Honesty

Is acting honorably , with truthfulness, fairness and justice, taking the welfare of the people and the community into account.

Why is honesty important for PPI?

Because honesty supports maintaining an atmosphere of fairness and justice, strengthening trust between us.

In addition, it is our priority to be recognized as a credible and trustworthy company by suppliers and individuals, by clients, and by the community in general.

People with whom we interact should know that we conduct ourselves with honesty and reject corruption and any act that would affect our efficiency, damage our reputation, and expose us to unnecessary risks.

Some examples on how we live honesty in PPI:

- By respecting other people's property.
- By recognizing the contributions, ideas and initiatives of others.
- By making proper use of company resources.
- By not lying or deceiving.
- By not accepting, participating, concealing or fomenting corruption or any unlawful act.



2.5 Loyalty



It is to demonstrate support and commitment towards the company and to feel proud for being a part of PPI.

Why is loyalty to PPI important?

Because this company's achievements are the result of the sum of the actions of the people who form a part of it. Loyalty to PPI leads us to guide our actions to fulfill the mission, the reason for being, and the values of the company, helping it to grow, strengthen and improve every day.

Some examples of how we live loyalty in PPI:

- By following the strategies established by the company, always seeking its benefit.
- By safeguarding information and resources of the company.
- By always keeping in mind, the purpose, mission, reason for being, and values of PPI.
- By adding value to the company through our work and the decisions we make.
- By making decisions looking for the best conditions for PPI.
- By feeling pride in doing our job well and in being a member of PPI.

2.6 Responsibility



It is to consciously make decisions, assuming the consequences of our actions and fulfilling our obligations in the best way.

Why is responsibility important for PPI?

Because acting responsibly has a positive impact on our life, work area, company, and country. All of us who work at PPI bring our knowledge, determination, and professional commitment to bear in order to achieve in time, form and with quality, the goals set for us.

Some examples of how we live responsibility in PPI:

- By asking and seeking answers when in doubt.
- By striving to learn and improve every day.
- By fulfilling our work responsibilities in time, form and with quality.
- By reflecting on and learning from our mistakes or those of others.
- By recognizing our mistakes, we can correct our faults and avoid repeating them.



2.7 Legality

It is to comply with provisions established in the laws, regulations and other applicable standards

Why is legality important for PPI?

Because when we behave according to the provisions in the laws, the trust and certainty in our action is strengthened.

Some examples of how we live legality in PPI:

- Knowing and complying with laws, rules, guidelines and provisions related to our work.
- Reporting any conduct contrary to the values of this Code and applicable regulations.
- Adhering in our conduct and decisions to applicable laws and regulations.
- Rejecting and reporting corruption, theft, fraud and any other unlawful act.

2.8 Impartiality

It is to behave and to act in an objective way, without influences, biases or prejudices; to treat others without distinction and not grant special or preferential treatment in established processes.

Why is impartiality important to PPI?

Because it strengthens the confidence our colleagues, partners, investors, suppliers, contractors or others have in us, knowing that we act and make decisions based on objective criteria.

Some examples of how we live impartiality in PPI:

- By using objective criteria when making decisions.
- By giving the same treatment to all the people with whom we interact.
- By not allowing outside influences or interests affect our actions and decisions.
- By using objective criteria in benefit of the company.
- By taking action and making decisions free of influences or interests contrary to those of the company.



2.9 Integrity

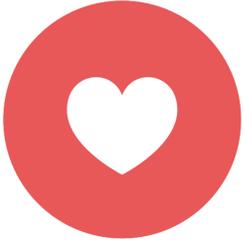
It is acting in accordance with all ethical principles and values contained in this Code.

Why is Integrity Important for PPI?

Because it creates trust between us and third parties or companies with whom we interact, and helps us create an environment with conditions favorable for fighting corruption.

Some examples of how we live integrity in PPI:

- By keeping in mind that our daily actions are adding to or subtracting from the results of the company.
- By acting and making decisions based on all ethical principles.
- By being upright in all our actions.
- By being consistent in what we say and what we do.



3. CORPORATE ETHICS GUIDELINES

They are the principles that establish the behavior that we must observe in the relationships between us and with commercial partners, to be perceived as an ethical, responsible and reliable company.

3.1 Information

- In PPI, we comply with the provisions established in matters of transparency, access to information, accountability and personal data protection.
- The information published by PPI will be accurate, correct, complete, truthful and timely and will be disseminated only by authorized persons and means.
- PPI will publish its information according to applicable provisions.

3.2 Fair competition

- In PPI, we promote and encourage fair and free competition.
- We offer fair and equal treatment to people and suppliers, contractors and any other commercial partner, using technical and economic selection criteria previously established by the company.



3.3 Anticorruption

- In PPI, we reject bribery, kickbacks, collusion, conflicts of interest, influence peddling, and in general, any form of corruption.
- We are against any payment or benefit to ensure preferential treatment or to accelerate business relationships.
- We do not accept or give away gifts, benefits, travel, commissions or any other form of compensation to influence a business decision or gain an undue advantage.
- In PPI, we commit to identifying and managing risks that may expose us to acts of corruption, to decrease the likelihood of their occurrence.

3.4 Conflict of interests

- We seek to prevent conflicts of interest to guarantee clean and transparent processes.
- Conflicts of interest arise whenever kinship, friendship, property interests or any other interests, are placed above those of PPI.



3.5 Relationship with third parties

- Our business relationships will be conducted in accordance with the ethical principles of the company and without putting other interests before those of PPI.
- In our commercial processes, we will strictly enforce our anti-corruption provisions in place.
- We are committed not to hire suppliers or contractors who engage in any practice that does not comply with the provisions of this Code.
- We encourage the adherence of suppliers and / or contractors to this Code and to the commitment of high ethical standards.
- PPI staff is free to participate in political activities in accordance with their democratic rights, provided they are performed outside of working hours and outside of PPI's facilities, without using company assets and without reference to their relationship with PPI.

3.6 Personal relationships

- We are an inclusive company; we reject any kind of discrimination, and promote a dignified, courteous, cordial and respectful treatment of all persons, recognizing always their rights and freedoms.
- We are committed to maintaining a work environment characterized by equality and non-discrimination, recognizing the value of human diversity regardless of ethnic or national origin, skin color, culture, sex, gender, identity gender, age, disability, social status, economic status, health, religion, physical appearance, genetic characteristics, pregnancy, language, opinions, sexual orientation, identity or political affiliation, civil status, family situation, family responsibilities or language.
- We prohibit any kind of sexual harassment, bullying or any type of violence or conduct that desecrates human dignity and/or violates human rights.

4. SUPPORT TOOLS

4.1 How to use this code?

This Code is a guideline that seeks to orient people working for PPI in the matter of ethics and integrity; however, it cannot include all possible situations where an ethical conflict could arise. Situations not foreseen in this Code must be solved using our own criteria, always respecting the principles and values described in it. For this purpose, the Code gives us tools that help us strengthen our ethics criteria in decision-making.

4.2 Five Questions

The following questions help us make ethical decisions. If in the development of our activities, we face a dilemma and the answer is not obvious, ask yourself the following questions:

Is the decision I am making ethical?

Ask yourself

1. Does this decision incorporate the values contained in this code and in that of the Code of Conduct?
2. Does the decision that I am making adhere to the regulations?
3. Have I fully understood the consequences of this decision?
4. Can this decision or my behavior be taken as a good example for others?
5. If this becomes public knowledge, will I continue to think that I did the right thing?

If the answer to all the above questions is yes, we can consider that the decision holds to the ethical principles of the company.



4.3 To whom do I go if in doubt?

As a general rule, we must first discuss the matter with our immediate supervisor. If that is not possible or if they cannot help us resolve the issue, we must continue searching until we find an answer or solution. For this, we can address the next hierarchical level or contact a member of the Ethics Committee to request advice and guidance on ethics issues.

1. Talk to your supervisor
2. Talk to the head of your division
3. Go to a member of the Ethics Committee

4.4 How to report breaches to the Code?

The information collected will be turned over to the areas empowered to know, investigate and, where appropriate, sanction the misconduct.

The Ethics Committee will seek to maintain the confidentiality of the complainants, and the information they express to their members. However, depending on the nature of the cases, the complaints may also be taken to the competent authorities and / or to the Internal Control area for their attention.

You can communicate to the Ethics Committee through email

Following mail: ethics@pemexprocurement.com and on the PPI website, and the complaint will be disseminated through the corresponding institutional mechanism.



5 PRACTICE AND FOLLOW UP

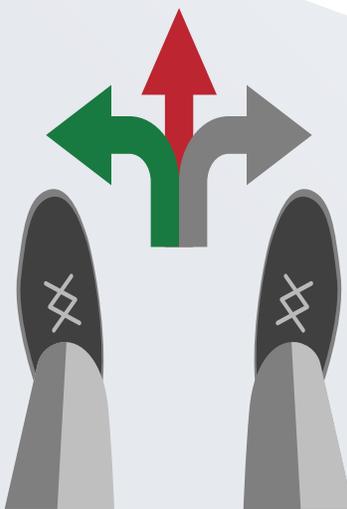
5.1 Personal responsibility

It is fundamental for PPI, that those of us who work for the company perform our functions pursuant to provisions in this Code. For this reason, we must train ourselves through the tools that the company provides.

All personnel will be required to sign a statement of adherence to the company's Codes of Ethics and of Conduct.

5.2 Code of Conduct

In order to support the fulfillment of the Code of Ethics and clarify its application, PPI has issued, and will maintain up to date its Code of Conduct, a supplementary document which establishes the expected and permitted behaviors for persons working in and for PPI, in accordance with compliance to the ethical principles described herein.



5.3 Ethics Committee

We have an institutional body that regulates and encourages the application and compliance with the provisions of the codes of Ethics and Conduct.

Objectives of the Ethics Committee

- To promote corporate strategies that generate an ethical environment which promotes the fulfillment of PPI's objectives.
- To promote knowledge and practice of the Codes of Ethics and of Conduct to improve the ethical culture of PPI.
- To know and analyze possible infractions to the codes of Ethics and of Conduct that have been reported.
- To know, to comment, to analyze and to instruct the corresponding areas, on the relevant cases of possible infractions to the codes of Ethics and Conduct, that have been reported.
- To verify the attention to or execution of the sanctions indicated for the relevant cases.

On the Ethics Committee Rules of Operation

The Ethics Committee has issued, and will keep its Rules of Operation updated to achieve the objectives set forth in this Code.



5.4 Non-retaliation policy

For PPI, the participation of all personnel in complying with this Code is paramount, so that acts of reprisals against those who have communicated or denounced any conduct contrary to this Code are prohibited, through mechanisms established for this purpose, guaranteeing their confidentiality and protecting their identity according to the applicable provisions.

PPI personnel having presented a report may not be subject to pressure, harassment, or retaliation.

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

5.5 Code Violations

It is the obligation of all PPI staff to comply with the provisions in this Code. PPI undertakes to analyze, through the Ethics Committee, all reports on possible violations of this Code that are received through the following email: ethics@pemexprocuement.com. If it considers it appropriate, the Ethics Committee will propose to the President of PPI the application of disciplinary sanctions pursuant to the applicable provisions that, depending on the severity of the case, can be from a warning up to and including termination of the employment relationship.

The consequences of breaching what is contained in this Code, in addition to the aforementioned labor sanctions, may result in actions or sanctions of an administrative, civil, commercial or even criminal nature, which will be applied by the competent authorities.

It is the obligation of all staff and other responsible entities to participate and cooperate in an honest and complete manner with any investigation or administrative process being carried out in connection with the breach of this Code.

The above is in addition to actions carried out by other instances.

Transitional Provisions

First: This Code will take effect the day after its approval by the Board of Directors of PPI.

Second: Notwithstanding the provisions of the first transitory provision, the Ethics Committee shall be responsible for the application of the necessary measures, so that PPI personnel is aware of and complies with it.

Third: The publication of this Code replaces the Code of Ethics issued on August 28, 2015.



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