

## ANTI-BRIBERY AND CORRUPTION POLICY

It is OPEX's policy to maintain high levels of ethical standards in the conduct of our business affairs. OPEX has zero tolerance for bribery and corruption. This policy has been adopted by OPEX and must be communicated to all those involved in the OPEX business to secure your commitment. OPEX will regard any breach of this policy as a serious matter and is likely to result in disciplinary action.

This is not only a cultural OPEX commitment, but also a moral issue and a legal requirement. Bribery is a criminal offense in most countries and acts of corruption expose OPEX and its staff to the risk of prosecution, fines and imprisonment, as well as endanger OPEX's reputation.

OPEX is committed to doing business honestly and ethically. We never offer, promise, give, accept or solicit a payment or benefit to a person that is intended as a reward or inducement to act contrary to the proper exercise of duty, good faith or impartiality. In addition, OPEX never directly or indirectly promises or receives anything of value to maintain business or to improperly influence a corporate decision.

Business opportunities may offer OPEX to enter into joint ventures or obtain agreements with other exploration and production companies. Before entering into such an arrangement, OPEX must conduct due diligence to verify the ethical reputation of the partner, identify potential anti-bribery or corruption risks, and plan appropriate remediation to ensure that business activities comply with anti-bribery and anti-corruption policy standards. Any improper, incorrect, irregular, disloyal, illegal or illicit conduct will have zero tolerance when doing business within OPEX and with other exploration and production companies.

This policy prohibits any inducement that results in personal gain or advantage to the recipient, or any person or body associated with them, and that is intended to influence them to act, which may not be solely in the interest of the person or organization that employs them or that represents OPEX. Nor will cheating or taking advantage of another's error be tolerated in order to obtain any profit or benefit.

The Anti-Bribery and Corruption Policy is strictly enforced in all countries where OPEX conducts business and all activities. In addition, it applies to shareholders, all employees, subcontractors, suppliers, vendors, and customers.

This policy has been approved and is fully supported by the Executive Director of OPEX, in addition to being in line with the provisions of both the General Law of the National Anticorruption System and the Federal Penal Code, the National Code of Criminal Procedures of Mexico and the FCPA.

Due to the foregoing, it is prohibited to carry out any acts that tend to influence the decision of public servants, as well as to make bribes directly or indirectly.

It is also forbidden to direct, organize, incite, induce, participate, collaborate, help, cooperate, attempt, hide, tolerate, conceal, execute or carry out conduct that is or may be acts of corruption or that tends to influence the decision of public servants improperly to the Company.

Any breach of this policy will result in disciplinary action, termination of contractual arrangements, and may also result in prosecution, criminal conviction, and/or severe financial penalties for anyone involved.

Everyone is personally responsible for ensuring that they comply with this Policy.

The OPEX Director and managers have a particular responsibility to ensure that this policy is applied and adhered to within their department or function and to monitor compliance with the policy. They must also ensure that subordinates in "exposure positions" to such actions attend the relevant training.

Date:

**Cesar A. Granados**

chief executive officer  
OPEX Perforadora SA de CV