

General	
Code: GE-01-P01	Review No.: 05
Preparation Date: Feb 25, 2015	Modification Date: Jun 21, 2021

Anti-Corruption Procedure for the Approval of Donations, Sponsorships, Improvements and



1. Purpose and Scope

In accordance with the Corporate Ethics Policy, this document describes the guidelines to be followed for the notification and approval of: (i) all Donations and/or Improvements made by IEnova or its Subsidiaries to Beneficiaries, (ii) Sponsorship of events or a Beneficiary, and (iii) payments of Memberships made by IEnova or its Subsidiaries.

This procedure applies to all employees of Infraestructura Energética Nova, S.A.B. de C.V. and its various subsidiaries in Mexico (hereinafter referred to as "IEnova" or the "Company").



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3. Procedure

3.1 General

The Company's policies allow Employees and/or IEnova to make Donations, Sponsorships and Improvements to the extent that they (i) are reasonable, (ii) have a beneficial or charitable purpose or are part of a social corporate or corporate social responsibility investment, (iii) are transparent and approved in accordance with this Procedure, (iv) are in line with IEnova's values, (v) are permitted by the applicable laws and (vi) are permitted by the directives and codes of conduct of the Beneficiary.

The Company's policies allow Employees and/or IEnova to pay for Memberships to the extent they (i) are reasonable, (ii) have a legitimate commercial purpose, (iii) are transparent and approved in accordance with this Procedure, and (iv) are permitted under the applicable laws.

3.2 Donations, Sponsorships and Improvements

When IEnova has selected a Beneficiary and the Donation and/or Improvement has been approved by the Corporate and Public Affairs Department, as applicable and, in accordance with GE-08 IEnova's "Commitments and Approvals Policy", the Due Diligence process of the Beneficiary must be initiated.

The person designated from the Corporate and Public Affairs Department must provide IEnova's Corporate Ethics Manager and Corporate Ethics Director with the documents necessary to proceed with the Due Diligence process, which includes but is not limited to the Donations, Sponsorships and/or Improvements Anti-Corruption Package.

Once IEnova's Corporate Ethics Manager and Director receive the Donations, Sponsorships and Improvements Anti-Corruption Package duly integrated, complete and signed, they will send it by e-mail or by any other means indicated by Sempra's Compliance Department, which shall conduct said Due Diligence.

Once the Due Diligence is complete, IEnova's Corporate Ethics Director will review the information received. If necessary, the Corporate Ethics Director may request further information on the matter and if satisfied with the review and there is no Red Flag, will pre-approve the granting of the Donation, Sponsorship and/or Improvement exclusively for the purposes of anti-corruption and request final approval by e-mail and/or any other means indicated to the party appointed of the Sempra's Compliance Department. If Sempra's Compliance Department is satisfied with the review conducted and if there is no Red Flag, it will return the respective approval within five business days in accordance with the procedures established for said purpose by Sempra.

After conducting or during the Due Diligence process, IEnova's Corporate Ethics Department and/or Sempra International's Compliance Representative will determine the need to request further information, in which case the term stipulated in the preceding point paragraph will be extended for the time necessary to complete the Due Diligence and the approval thereof, as the case may be.

IEnova's Corporate Ethics Manager will report the approval to the person designated from the Corporate and Public Affairs Department, who in turn will ensure the due compliance with the internal policies and/or procedures to perform the Donation, Sponsorship and/or Improvement. Otherwise, the IEnova's Corporate Ethics Manager

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shall notify the rejection to make said Donation, Sponsorship and/or Improvement. If rejected, IEnova and its employees must refrain from granting the Donation, Sponsorship and/or Improvement.

For the acquisition of goods or assignment of suppliers to carry out works or improvements to be donated in kind, the process established by the Supply Chain area must be followed in accordance with the Purchasing Policy (or its equivalent in accordance with the applicable policy for the ECA LNG project), in the sense that the goods to be donated must be acquired according to an Order Request (as said term is defined in the Purchasing Policy or its equivalent according to the applicable policy for the ECA LNG project) and according to the process of selecting suppliers to award the purchase (point 3.5 of the Purchasing Policy or its equivalent in accordance with the applicable policy for the ECA LNG project), it is strictly forbidden to apply point 3.5.2 of the Purchasing Policy regarding the Direct Assignments and Single / Sole Source (or its equivalent according to the applicable policy for the ECA LNG project).

The only exception to the above will be in the case of works or improvements to be carried out by the same supplier that is carrying out the works of the main project (EPC supplier) for which the point 3.5.2 of the Procurement Policy regarding Direct Assignments and Single Source (or its equivalent in accordance with the applicable policy for the ECA LNG project), may apply for carrying out the works or improvements to be donated in kind.

In the case of mass donations that include multiple beneficiaries (for example, school books and materials, end-of-year events, etc.) and it is not feasible to obtain the documents stipulated in the Donation, Sponsorship and/or Improvement Anti-Corruption Package, the following steps must be taken:

- The delegate from the Corporate Affairs and Talent and Culture Management Department shall draft a free document to describe in detail the donation to be made. As a minimum, said document shall include the following points: amount and/or valuation of the donation, donation purpose, the description of the beneficiaries, the assets to be donated, and the date and venue of the event. This document shall be prepared prior to the acquisition of assets to be donated and the granting of the donation. It must be submitted to the IEnova's Corporate Ethics Manager and/or Corporate Ethics Director, who shall send it as soon as possible to Semptra's Compliance Department for review.
- Once the aforementioned document is received, Semptra's Compliance Department will review it and may request more information, if necessary. In the review proves to be satisfactory and if there are no Red Flags, the Compliance Department shall approve the granting of the donation solely for anti-corruption purposes within a term not exceeding 5 business days.
- The delegate from the Corporate Affairs and Talent and Culture Management Department shall document the granting of the donation visually (video and/or photographs). The delegate from the Corporate Affairs and Talent and Culture Management Department shall submit said documentation to IEnova's Corporate Ethics Manager and/or Corporate Ethics Director within the 5 business days following the granting of the donation. Said Manager and/or Director shall send it to Semptra's Compliance Department within a maximum of two business days.
- The donations referred to in this section may only be made to beneficiaries that are non-government entities and do not include public officials. When there is a possibility or when there is certainty that a mass donation may include beneficiaries, who are close relatives of a public officer, this situation must be mentioned in the report described in the first step.

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- IEnova's Corporate Ethics Manager will be responsible for keeping a file for each request that includes the Donations, Sponsorships and/or Improvements Anti-Corruption Package, any other document related to the investigation conducted, including the authorization, as well as keeping the registration system designated by Sempra updated.

The following steps apply to Donations, Sponsorships or Improvements:

- As far as possible, all Donations and Sponsorships must be granted as goods acquired directly by IEnova for subsequently delivery to Beneficiaries.
- Donations, Sponsorships or Improvements must not be made on behalf of Public Officers (regardless of the amount), when said Donations, Sponsorships and Improvements are requested by a Public Officer or made or pledged on behalf thereof. This is in order that, as compensation or by way of response, said Public Officer may make a discretionary decision or intervene on behalf of IEnova.
- Donations, Sponsorships or Improvements must not be made to any Beneficiary appointed by a Public Officer, unless it is a world-renowned Non-Government Entity. Médecins Sans Frontières (Doctors Without Borders) and The Red Cross are examples of world-renowned Non-Government Entities.

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- As a general policy, Donations, Sponsorships and Improvements can only be made to renowned Non-Government Entities, such as The Red Cross, Médecins Sans Frontières (Doctors Without Borders) and UNICEF.
- All Donations, Sponsorships and Improvements must be entered in IEnova's accounting records objectively and accurately.
- The size and/or scope of the Due Diligence will be determined by Sempra's Compliance Department based on its procedures, risk matrices and other factors to be considered on a case-by-case basis.

3.3 Memberships

When IEnova decides to acquire or renew a Membership and said participation has been approved by the Corporate Affairs and Talent and Culture Management Department, as applicable and, in accordance with GE-08 IEnova's "Commitments and Approvals Policy", the Due Diligence process of the association, chamber or company of which the employee or IEnova wishes to join must be initiated.

The employee interested in acquiring and/or renewing the Membership of the member of IEnova designated to perform the acquisition and/or renewal must provide IEnova's Corporate Ethics Manager and Corporate Ethics Director with the documents necessary to proceed with the Due Diligence process, which includes but is not limited to the Membership Anti-Corruption Package.

Once IEnova's Corporate Ethics Manager and Director receive the Membership Anti-Corruption Package duly integrated, complete and signed, they will send it by e-mail or by any other means indicated by Sempra's Compliance Department, which shall conduct said Due Diligence.

After conducting or during the due diligence process, IEnova's Corporate Ethics Department and/or Sempra's Compliance Representative will determine the need to request further information, in which case the term stipulated in the preceding paragraph will be extended for the time necessary to complete the Due Diligence and the approval thereof, as the case may be. If Sempra's Compliance Department is satisfied with the review conducted and if there is no Red Flag, it will return the respective approval within five business days in accordance with the procedures established for said purpose by Sempra.

IEnova's Corporate Ethics Manager will inform the interested party or the member of IEnova and/or its subsidiary designated to perform the acquisition and/or renewal of the approval of the acquisition and/or renewal of the Membership, who in turn will ensure the due compliance with the internal policies and/or procedures necessary to renew and/or acquire the Membership. Otherwise, the Corporate Ethics Manager will report the rejection of the Membership. If rejected, IEnova and its employees must refrain from acquiring and/or renewing the Membership.

IEnova's Corporate Ethics Manager will be responsible for keeping a file for each request that includes the Membership Anti-Corruption Package, any other document related to the investigation conducted, including the authorization, as well as keeping the registration system designated by Sempra updated.

The size and/or scope of the Due Diligence will be determined by Sempra's Compliance Department based on its procedures, risk matrices and other factors to be considered on a case-by-case basis.

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3.4 Donations, Sponsorships and Improvements Reports

Every six months, the Regulatory Compliance Manager shall request the Corporate Ethics Manager for a list of Donations, Sponsorships and Memberships authorized for the purposes of anti-corruption in the half-year in question. Once the list is received, the Regulatory Compliance Manager shall request the Comptroller's Department delegate to confirm the following:

- That the aid provided for in the list has been paid and assigned to the respective accounting accounts and sub-accounts.
- If other aid has been paid in the period in addition to the amounts contemplated in the list.

If any of the aid amounts contained in the list mentioned in this section have not been paid at the review date of this report, the Regulatory Compliance Manager shall require the internal applicant of the aid in question to confirm its current status.

If other aid amounts have been paid, the Regulatory Compliance Manager shall confirm with the Corporate Ethics Manager if the aid amounts not contemplated in the original list have been duly authorized for anti-corruption purposes.

3.5 Exception

This procedure shall not be applicable to the approval of Donations, Sponsorships and/or Improvements to be granted to indigenous or tribal communities since these are regulated by the IEnova specific procedure applicable to them.

Any exception related to the documentation requirements described in this procedure shall be approved by IEnova's Executive Vice President and General Counsel and the person appointed from Semptra's Compliance Department.

3.6 Cases of Emergency

In cases of emergency due to natural disasters such as earthquakes, hurricanes or those that have similar consequences in the community, IEnova's Executive Vice President and General Counsel, subject to the prior confirmation of the Anti-Corruption risks, the need for aid and having obtained authorization from the Chief Executive Officer, or its delegate, shall approve and notify the Corporate Ethics Department of the nature of that aid approved based on the emergency.

Within 24 hours, the Corporate Ethics Department shall report the nature of aid to the Semptra Energy delegate and write a memorandum describing the emergency, the type of aid approved and the name of the organization or the community for which the aid was authorized within 3 business days. in order to document the aid required.

The Corporate Ethics Department shall also input the memorandum and the details of the aid into the system indicated by the Semptra Energy delegate, including aforementioned and any other documentation available to document the provision of the aid and/or the emergency.

It must be mentioned that the Donations, Sponsorships and Improvements Anti-Corruption Package need not be presented for cases of emergency within the aforementioned

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terms. However, the Package must be submitted within a period not exceeding 90 calendar days for its due documentation.

3.7 General issues of the approvals for the anti-corruption purposes contained in this procedure

All the approvals for anti-corruption purposes must be granted in a maximum period of six calendar months from their approval. After this term the anti-corruption certificate will expire and the entire anti-corruption process must be repeated.

All the approvals for the anti-corruption purposes contained in this procedure are transactional; i.e., they may only be used on a single occasion for the unique and specific transaction for which they were granted.

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4. Definitions and Terminology

Term	Definition
Red Flag	Red Flags are the warning signals that alert the possibility of the existence of inappropriate events, associations or conduct. The following are common examples of red flags for all Donations, Sponsorships, Improvements and/or Memberships: (i) a narrow link between the transaction, the Company and the Government Entity or the Public officer in question; (ii) false or deceitful invoices or reports; (iii) the frequency with which the Donations, Sponsorships, Improvements and/or Memberships are made; (iv) Requests for payment in cash by Beneficiaries; (v) documents that conceal or falsify the identity of any of the parties of a transaction; (vi) the denial by the Beneficiary or association to be bound in writing to the anti-corruption laws, any other current laws or IEnova's policies when requested to do so, and (vii) a Public officer suggests or recommends the Beneficiary.
Beneficiary (Donation, Sponsorship or	Refers to the Government Entity and/or the Non-Government Entity selected as the beneficiary of a Donation, Sponsorship or Improvement.
Due Diligence	Refers to the and review and investigation process that includes but is not limited to (i) obtaining a background verification report and/or searching the names of the Beneficiaries, their partners, stockholders or administrators in government lists such as the Politically Exposed Persons List, Sanction Lists, Specially Designated Nationals List, Watch Lists: Embargo and Caution Lists (FBI, World Bank, Interpol, etc.), the Denied Persons List, the Unverified List, the Entity List and Debarred Lists; (ii) conducting a review in the electronic media, including searches on Internet servers to identify potentially adverse information in terms of accusations of corruption, collusion, other illegal activities or other questions that could have a significant impact on the Company's reputation and/or (iii) requesting additional diligence including an external legal opinion for certain specific cases.
Donation	Refers to the acts of giving money in cash or an equivalent thereto (for example, a gift voucher or certificate, a gift card, share or bonus), other material goods or services, generally for charitable purposes or without expecting anything in return, including payments for materials supplied or services rendered.
Employee(s)	All the Company's staff, whether with a permanent or temporary contract and/or subcontracted.
Government Entity	Refers to any: (i) government, department, body, agency or entity, whether Federal, State or Municipal, including the administrative, judicial and legislative branches; (ii) political party;

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	<p>(iii) department, society, company, firm, public institution or non-profit association wholly owned or controlled by any government body, such as semi-state companies or state manufacturing companies; and</p> <p>(iv) international public organizations, such as the United Nations and the World Bank.</p>
Non-Government Entity	<p>Refers to non-profit institutions, organizations or entities and Non-Government Entities that do not have any direct or indirect relationship with any Public officer, which may include but are not limited to:</p> <p>(i) Hospitals, clinics and other health institutions.</p> <p>(ii) Research institutions, considered as those with the main purpose of conducting research activities to improve the quality of life of the community</p> <p>(iii) Educational Institutions</p> <p>(iv) Development institutions, these being understood and those focused on promoting economic development.</p> <p>(v) Communes and communities</p>
Close Relatives	<p>Refers to spouses, parents, brothers and sisters, children, grandparents, grandchildren, aunts, uncles and first cousins.</p>
Public officers	<p>Any official or employee of any Government Entity, including but not limited to:</p> <p>(i) Any official or employee of any political party;</p> <p>(ii) Any candidate for public office;</p> <p>(iii) Any employee of an international organization such as the United Nations and the World Bank;</p> <p>(iv) Any official or employee of any department, society, company, firm, public institution or non-profit association wholly owned or controlled by any government body, such as semi-state companies or state manufacturing companies; and/or</p> <p>(v) Close relatives of any official or employee mentioned in points (i) to (v).</p>
Improvement	<p>Refers to works performed in public rights of way or on public and/or private assets at no cost to the beneficiary.</p>
Membership	<p>Refers to joining or renewal fees as a member for the participation of any Employee or IEnova in a chamber, public college, institution, commission or association directly related to the nature of IEnova's businesses. Personal memberships paid to the Employees by the Company as an employment benefit and that bear no relationship with the nature of IEnova's business shall be considered to be exceptions to this procedure. Examples of these are: Barra Mexicana, Colegio de Abogados A.C.; Asociación de Abogados de Empresa A.C.; Colegio de Contadores Públicos de México A.C.; Instituto Mexicano de Ejecutivos de Finanzas A.C.; Instituto Mexicano de Auditores Internos A.C.</p>
Donations, Sponsorships and/or Improvements Anti-	<p>Refers to the documentation (i) contained in the List of Documents (attached hereto as GE-01-P01-A01); (ii) the Support Request, as applicable (attached hereto as GE-01-P01-F01) and (iii) the Anti-Corruption Certificate (attached hereto as GE-01-P01-F02).</p>

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Membership Anti-Corruption Package	Refers to the documentation (i) contained in the List of Documents (attached hereto as GE-01-P01-A01); (ii) the Support Request, (attached hereto as GE-01-P01-F06) and (iii) the Anti-Corruption Certificate (attached hereto as GE-01-P01-F02).
Sponsorship	Refers to the contribution made by IEnova, either in cash or in-kind to support an initiative or activity organized by a third party in exchange for the public exhibition or display of IEnova's brands or other commercial benefits.
Subsidiary	Refers to the company in which the Company is a stockholder or exercises any type of "control" over it. The Company is understood to exercise control of another company if it has the capacity to perform any of the following actions: (i) impose, either directly or indirectly, decisions at the of the stockholders, partners or equivalent bodies, or appoint or remove the majority of the members, administrators or their equivalents of a company; (ii) hold the ownership of the rights that permit, either directly or indirectly, to exercise the vote of more than 50% of the capital stock of a company; or (iii) manage or direct, either directly or indirectly, the management, strategy or the main policies of a company, whether through the ownership of securities, by contract or any other manner.

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5. References and Forms

5.1 Internal References

- Code of Ethics
- GE-01 Corporate Ethics Policy.
- GE-08 Commitments and Approvals Policy

5.2 External References

- N/A

5.3 Forms

Document Code and Name	Withholding Code
GE-01-P01-A01 List of Documents	ADM-60-02
GE-01-P01-F01 Support Request for Donation or Improvement Entity)	ADM-60-02
GE-01-P01-F02 Anti-Corruption Certificate	ADM-60-02
GE-01-P01-F06 Membership Application	ADM-60-02

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6. Responsible Parties

Responsibility	Department
Manage the content of the procedure (Procedure Owner)	Corporate Ethics Director
Comply with procedure	All employees
Overseeing compliance	Legal Department/Corporate Ethics Department
Applying sanctions	Talent and Culture Management



7. Authorization

Name	Position
René Buentello Carbonell	Executive Vice President of Compliance and General Attorney
Roberto Rubio Macías	Comptroller Vice-President
Ramiro Fernández	Sr. Compliance Manager



8. Contacts (Doubts and/or Clarifications)

Questions related to the implementation of or compliance with this Procedure must be discussed with your immediate supervisor. The contact designated as responsible for this Procedure will be the Compliance Manager or you can contact the Ethics Helpline on 800 062 2107. The Ethics Helpline is available 24 hours a day, 7 days a week. All calls received by the Ethics Helpline will be treated as confidential.

Contact	E-mail	Telephone Number
René Buentello	rbuentello@ienova.com.mx	(55) 91 38 01 00
Alex Rios	arios@sempraglobal.com	(55) 91 38 01 00
Jimena Hernandez	jihernandez@ienova.com.mx	(55) 91 38 01 00

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9. Change Control

Review	Date	Description	Section Affected	Observations
1	Jun 19 2015	5.2.1, 5.2.2, 5.2.6, 5.3.1, 5.4.1	N/A	N/A
2	Jun 13, 2016	5.2.7 and 5.3.9. 5.4 is deleted; therefore, 5.5 becomes 5.4	N/A	N/A
3	Dec 15 2016	5.4.1	N/A	N/A
4	Nov 15 2017	5.4.1	N/A	N/A
5	Mar 12 2018	5.6	N/A	N/A
6	Feb 8 2019	5.2.7	N/A	Point added so the subsequent sections run accordingly.
7	Mar 25 2019	2	N/A	The exception to the procedure is included in the definition of Membership;
8	Dec 23 2019	Point 5.5.2 included	Exception	N/A
9	Mar 25 2020	Modification of 5.4. Elimination of 5.3.5. and 5.3.8. Point 6 added	N/A	N/A
10	August 1, 2020	Policies review project	All	Adaptation to new format