



The Irrevocable Trust Number CIB/2919 CFE Fibra E

In re: CFE FIBRA E – US Federal Income Tax Consequences
Tax Information for Passive Foreign Investment Company (“PFIC”)
PFIC Annual Information Statement

Dear Investor,

As stated in our Series A Energy and Infrastructure Investment Trust Certificates’ Offering Memorandum dated February 7, 2018 (“Offering Memorandum”), for U.S. federal income tax purposes, CFE FIBRA E expects to be treated as a Passive Foreign Investment Company (a “PFIC”) for the current taxable year and thereafter.

In accordance with IRC Section 1295, The Irrevocable Trust Number CIB/2919 CFE FIBRA E is required to provide a PFIC Annual Information Statement to its shareholders. The PFIC Annual Information Statement contains information to enable you, should you chose, to elect to treat CFE FIBRA E as a Qualified Electing Fund (“QEF”). A U.S. investor who makes a QEF election is required annually to include in income its pro rata share of the QEF’s ordinary earnings and net capital gain. The QEF election is made by completing and attaching IRS Form 8621 to your federal income tax return.

For your reference, the Offering Memorandum, Tax Section, contains further detail on PFIC rules. Tax rules relating to PFIC investments are complex and you are advised to consult with your tax advisor.

PFIC Annual Information Statement

1. This statement applies to the taxable year of **The Irrevocable Trust Number CIB/2919** (the Company) beginning on January 1, 2019 and ending on December 31, 2019 (the "Taxable Year").
2. The Company's total outstanding CBFES Series A, ordinary earnings and net capital gain (as defined in IRS Treasury Regulation Section 1.1293-1(a)(2)) with respect to CBFES Series A for the Taxable Year was:
 - a. Outstanding CBFES Series A: 853,195,411
 - b. Ordinary earnings with respect to CBFES Series A: Mex \$1,335,087,970
 - c. Net capital gain with respect to CBFES Series A: NIL
3. The amount of cash and the fair market value of other property distributed or deemed distributed by the Company with respect to CBFES Series A during the Taxable Year:
 - a. Cash: Mex\$2,498,778,517
 - b. Fair market value of property: **NIL**
4. The Company will permit its shareholders to inspect and copy its permanent books of account, records and such other documents as may be maintained by the Company that are necessary to establish that the Company's ordinary earnings and net capital gain, as provided in IRC Section 1293(e), are computed in accordance with U.S. income tax principles and to verify the shareholder's pro-rata share of such amounts.

The Irrevocable Trust Number CIB/2919

Signed: 

By: José Arturo Cerón Vargas

Title: CEO

Date: July 1, 2020

Please note that this information is exclusively for the purpose of assisting U.S. taxpayer clients in making QEF election tax basis computations. Neither this information constitutes a tax advice. We only provide information for the Fibra E investment in that may be classified as PFIC.