

Report of Organizational Actions Affecting Basis of Securities

OMB No. 1545-0123

► See separate instructions.

Part I Reporting Issuer

1 Issuer's name		2 Issuer's employer identification number (EIN)	
CIBANCO, S.A., INSTITUCION DE BANCA MULTIPLE, AS TRUSTEE OF IRREVOCABLE TRUST F/00939		98-1097801	
3 Name of contact for additional information	4 Telephone No. of contact	5 Email address of contact	
	+52 (55) 5279-8106		
6 Number and street (or P.O. box if mail is not delivered to street address) of contact		7 City, town, or post office, state, and ZIP code of contact	
PRESIDENTE MASARYK NO. 61, PISO 7		CHAPULTEPEC MORALES C.P. 11570, MEXICO, D.F.	
8 Date of action		9 Classification and description	
SEE BELOW		CERTIFICADOS BURSATILES FIDUCIARIOS INMOBILIARIOS ("CBFI")	
10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)
N/A	N/A	TERRA13 ON BMV MARK	N/A

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ► THE TECHNICAL COMMITTEE OF TERRAFINA HAS ADOPTED A DIVIDEND POLICY OF PAYING QUARTERLY CASH DISTRIBUTIONS TO ALL SHAREHOLDERS ON A PRO RATA BASIS. TERRAFINA MADE A CASH DISTRIBUTION ON 3/9/2022 IN EXCESS OF ITS CURRENT AND ACCUMULATED EARNINGS AND PROFITS. SEE PART II, LINE 15 FOR THE AMOUNT OF THESE DISTRIBUTIONS.

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ► TERRAFINA MADE DISTRIBUTIONS OF \$17,163,880 OF WHICH \$14,912,279 WERE OUT OF TERRAFINA'S CURRENT YEAR E&P AND ARE TREATED AS DIVIDENDS, THE OTHER \$2,251,601 RESULTED IN A REDUCTION IN THE BASIS OF TERRAFINA SHARES.

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ► TERRAFINA'S CURRENT E&P WAS CALCULATED UNDER IRC 312 AND ONLY DISTRIBUTIONS MADE OUT OF TERRAFINA'S CURRENT YEAR AND ACCUMULATED E&P ARE TREATED AS "DIVIDENDS." UNDER IRC SECTION 301(c)(2), THE PORTION OF THE DISTRIBUTION WHICH IS NOT A DIVIDEND SHALL REDUCE THE ADJUSTED BASIS OF THE SHARES.

Part II Organizational Action (continued)**17** List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶

IRC SECTION 301 (c)(2)

IRC SECTION 312

IRC SECTION 316

IRC SECTION 1297

18 Can any resulting loss be recognized? ▶ NO.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ THE ORGANIZATION ACTION IS REPORTABLE WITH RESPECT TO CALENDAR YEAR 2022. SHAREHOLDERS SHOULD CONSULT WITH THEIR TAX ADVISORS REGARDING THE EFFECT OF THE NON-TAXABLE RETURN OF CAPITAL.

Sign Here

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Signature ▶

Date ▶

Print your name ▶

Title ▶

Paid Preparer Use Only

Print/Type preparer's name

DANIEL HAGGARD

Preparer's signature



Date

08/07/2023

Check ☐ if self-employed

PTIN

P01394071

Firm's name ▶ PWC US TAX LLP

Firm's EIN ▶ 92-0460586

Firm's address ▶ 300 MADISON AVENUE, NEW YORK, NY 10017

Phone no. 646-471-3000

Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054

The information contained herein is being provided pursuant to the requirements of Section 6045B of the Internal Revenue Code of 1986, as amended. The information in this document does not constitute tax advice and should not be construed to take into account any shareholder's specific circumstances. Holders and nominees should consult their own tax advisors regarding the particular tax consequences of the organizational action (as described in this document) to them, including the applicability and effect of all U.S. federal, state, and local and foreign tax laws.