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## **ANTI-RETALIATION FOR REPORTING ILLEGAL OR UNETHICAL CONDUCT**

### **GENERAL PURPOSE**

To affirm the commitment of Marathon Petroleum Corporation (“MPC”) and its consolidated subsidiaries (the “MPC Group”) to providing a work environment and corporate culture free from retaliation and retribution for reporting suspected illegal or unethical conduct or participating in an investigation of such a report. The company understands a person’s willingness to report potential compliance and ethics violations may be reduced when he or she fears retaliation for reporting or participating in an investigation. This Policy confirms the company’s policy strictly prohibiting retaliation.

### **POLICY STATEMENT**

1. The company prohibits retaliation against anyone (including vendors, customers, contractors and leased workers) who in good faith reports suspected illegal or unethical conduct connected with the business of the MPC Group, or who participates in an investigation of such a report.
2. Retaliation involves any conduct that punishes or is intended to punish or otherwise disadvantage anyone for reporting or participating in an investigation of suspected illegal or unethical conduct, or is intended to dissuade or otherwise discourage anyone from making such a report or from participating in such an investigation.
3. Retaliation can take many forms, including conduct or written communication, verbal or nonverbal behaviors, actual or implied threats, changes to the terms or conditions of employment or contract, harassment, bullying, intimidation or deliberate exclusionary behaviors. The following are examples of conduct that, when intended to punish or dissuade good faith reporting or participation in an investigation, could violate this Policy:
  - Adverse employment action affecting salary, compensation or benefits
  - Demotion, discipline, suspension or termination of employment
  - Unwarranted negative performance feedback or review
  - Significant adverse changes to work responsibilities or assignments
  - Rescinding or denying opportunities for training or advancement
  - Exclusion from business meetings or activities
  - Directing an individual not to report to outside regulators
  - Creating or allowing a work atmosphere hostile toward the individual
  - Terminating a purchase order or contract for services
4. The prohibition against retaliation is not limited to acts of retaliation by a supervisor or manager. This Policy also covers acts of retaliation by a non-supervisory employee against another non-supervisory employee.



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5. Any employee who, regardless of position, engages in retaliation is subject to disciplinary action, up to and including termination.
  6. All good faith allegations of retaliation will be reviewed and investigated to the extent warranted based on the nature of each allegation. In the event retaliation is verified, the Human Resources organization, will work with other organizations, as appropriate, to determine appropriate corrective actions, up to and including termination.

## **POLICY APPLICATION**

This Policy applies to MPC and those entities within the MPC Group that have adopted it. Further, the substance of this Policy, appropriately adapted for the conditions involved, is recommended for adoption by MPC affiliate-operated joint venture entities.

## **POLICY ADMINISTRATION**

The administration of this Policy is the responsibility of the MPC Chief Compliance Officer.

## **POLICY REVIEW**

This Policy shall be reviewed at least once every five years, or more frequently as stipulated by the approver, or when a significant change occurs, including any change in law, that impacts the content or substance of this Policy.

## **POLICY EXCEPTIONS**

None

## **REFERENCES**

Policy #2001, Code of Business Conduct  
Policy #2003, Code of Ethics for Senior Financial Officers  
Policy #2003x, Code of Ethics for Senior Financial Officers  
Policy #2004, Whistleblowing as to Accounting Matters  
Policy #2004x, Whistleblowing as to Accounting Matters  
Policy #2008, Reporting of Illegal or Unethical Conduct  
Policy #10001, Equal Employment Opportunity  
Policy #10003, Harassment