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## EQUAL EMPLOYMENT OPPORTUNITY

### GENERAL PURPOSE

To affirm the commitment of Marathon Petroleum Corporation (“MPC”) and its consolidated subsidiaries (the “MPC Group”) to provide a work environment free from unlawful discrimination or retaliation, to ensure, through equal employment practices, that all present and prospective employees have equal opportunities in all aspects of the employment relationship, and to comply with federal, state and local laws governing non-discrimination in employment where MPC operates.

### POLICY STATEMENT

- 1. Equal Employment Opportunity Statement:** It is the policy of MPC and its affiliates to comply with all applicable laws and regulations prohibiting discrimination in employment based upon a protected status and to select, develop and promote employees based on the individual’s ability and job performance. The company will take action to ensure that all employment practices and decisions regarding any term and condition of employment are made without regard to race, color, religion, creed, sex, sexual orientation, gender (including pregnancy, childbirth, breastfeeding or related medical conditions), gender identity, gender expression, reproductive health decision-making, age, mental or physical disability, medical condition or AIDS/HIV status, ancestry, national origin, genetic information, military, veteran status, marital status, citizenship or any other status protected by applicable federal, state, or local laws. Such action will apply to, but will not be limited to, recruitment, hiring, placement, promotion, reclassification, transfer, discipline, layoff, termination, compensation and selection for training and development. Unlawful discrimination based on any of these characteristics is strictly prohibited and will not be tolerated.
- 2. Pay Transparency:** The company will not terminate the employment of an employee or in any other manner discriminate against any employee or applicant for employment because such employee or applicant inquired about, discussed or disclosed their own compensation as an employee of the company, their potential compensation as an applicant seeking employment with the company, the compensation of another employee of the company, or the potential compensation of an applicant seeking employment with the company. However, employees who have access to the compensation information of other employees or applicants as part of their essential job functions will not disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is in response to a formal complaint or charge, in furtherance of an investigation, proceeding, hearing or action, including an investigation conducted by the company, or consistent with the company’s legal duty to furnish information.
- 3. Manager Responsibilities:** The manager designated for each business unit is responsible for ensuring that all subordinate levels of supervision in his or her area of responsibility are kept informed of this Policy’s implementation and administration and for providing staff assistance with its understanding. In addition, managers and supervisors will maintain a work environment that does not include unlawful discrimination against protected status groups or retaliation and will ensure that all employment practices and decisions are administered in accordance with this Policy.
- 4. Postings:** The company’s Equal Employment Opportunity and Affirmative Action Statement will be signed by the MPC President and Chief Executive Officer and posted at the company’s operation sites as well as on external and internal company web sites.



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5. **Affirmative Action Compliance Programs:** Affirmative action compliance programs will be developed and maintained for covered sites in furtherance of the company's commitment to equal employment opportunity. These programs will be annually reviewed and updated as necessary to promote employment-related opportunities for qualified women, minorities, protected veterans, and those with disabilities. These programs will be administered in a manner consistent with the company's policy of non-discrimination in all employment practices and decisions.
  6. **Reasonable Accommodations:** In furtherance of its commitment to equal employment opportunity, the company will make good faith efforts to provide reasonable accommodation to qualified individuals with a disability or with known limitations related to pregnancy, childbirth, or related medical conditions as well as to those with a sincerely held religious belief or creed in accordance with the law. What constitutes a reasonable accommodation depends on the circumstances of each situation and therefore will be addressed on a case-by-case basis.
  7. **Reporting an Incident of Discrimination or Retaliation:** If an individual believes he, she, another employee or individual, has been subjected to any form of discrimination or retaliation, the individual observing or experiencing the alleged discrimination or retaliation must immediately report the incident to one of the following:
    - The individual's supervisor or manager;
    - Another supervisor or manager;
    - Human Resources;
    - Business Integrity and Compliance;
    - The Integrity Helpline (855-857-5700, [www.FuelingIntegrity.com](http://www.FuelingIntegrity.com)) (Individuals who use the Integrity Helpline may choose to remain anonymous); or
    - Any of the other avenues for reporting discrimination or retaliation established by the company.

Reports of potential or actual violations of this Policy may be verbal or written and are not required to be in any particular form. Managers or supervisors who receive complaints or who are otherwise aware of conduct that may be in violation of this Policy must immediately report all such complaints and conduct to Human Resources or Business Integrity and Compliance.

8. **Investigation Process:** The company's process for handling complaints reported to the resources identified above concerning potential violations of its policies prohibiting unlawful discrimination and retaliation is to maintain that all investigations are: a) treated confidentially, to the extent practicable and in accordance with applicable law; b) responded to in a timely fashion; c) investigated fairly, promptly and thoroughly by impartial and qualified personnel in a manner that provides all parties appropriate due process and reaches reasonable conclusions based upon the evidence gathered; d) documented and tracked to ensure reasonable progress; e) met with appropriate remedial action where misconduct is found; and f) afforded a timely closure. Employees are expected to cooperate and be forthcoming and truthful if they are asked to provide information in relation to a company investigation.
9. **No Retaliation:** The company strictly prohibits retaliation or threats of retaliation against those who report a violation of this Policy, oppose harassment pursuant to the Policy, or participate in an investigation of alleged violations of this Policy. Participating in an investigation of alleged violations of this Policy may include the following: making or filing an internal complaint with the company about alleged unlawful discrimination; providing informal notice to the company regarding alleged unlawful discrimination; filing a complaint with a federal, state or administrative agency; participating in or cooperating with a federal, state or administrative agency that is conducting an investigation of the company; testifying as a party,



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witness or accused regarding alleged unlawful discrimination or associating with another employee who is engaged in any of these activities. If an employee believes that he or she is being retaliated against or observes retaliation by another employee, supervisor, manager or non-employee, he or she should immediately report the incident to one of the reporting resources outlined in this Policy.

10. **Discipline:** Employees who violate this Policy will be subject to appropriate disciplinary action, up to and including termination. Moreover, any employee, supervisor or manager who condones, ignores, or fails to appropriately escalate violations of this Policy will be subject to appropriate disciplinary action, 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.

This Policy under no circumstances is it to be construed as creating or constituting a contract of employment (expressed or implied) between MPC or its affiliates and any employee.

## **POLICY ADMINISTRATION**

The administration of this Policy is the responsibility of the MPC Chief Human Resources Officer and Senior Vice President Communications.

## **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 #2007, Anti-Retaliation for Reporting Illegal or Unethical Conduct  
Policy #10003, Harassment and Appropriate Workplace Conduct  
Policy #10009 Reasonable Accommodation of Disabilities  
Acknowledgement and Receipt MPC's EEO and Harassment and Appropriate Workplace Conduct Policies for California Employees