

Execute WITH INTEGRITY

We are committed to integrating sustainability in our decision-making and upholding accountable and transparent governance.

Accountable and Transparent Governance

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ACCOUNTABLE AND TRANSPARENT GOVERNANCE

Our Board of Directors

MPC’s Board provides oversight for our company operations and activities, as well as our strategic direction, including sustainability objectives. The Board believes that MPC’s commitment to strong corporate governance benefits all our stakeholders, including our shareholders, our people, business partners, customers, communities and governments.

As new director candidates are selected, the Board continues its commitment to include candidates with a wide variety of skills, professional experience, backgrounds and perspectives. Criteria for consideration set forth in our Corporate Governance Principles also include demonstrated leadership capabilities, integrity and judgment, record of public service, and an understanding of sustainability.

As part of our ongoing Board refreshment process, we welcomed three new independent directors in 2024: Kimberly Ellison-Taylor, Eileen Paterson and Jeff Campbell. Together, they bring expertise in technology, operations, finance and risk management to our Board.

For information about the individuals serving on the MPLX Board of Directors, please visit the Corporate Governance section of the MPLX [website](#).



Abdulaziz F. Alkhayyal
Former Senior Vice President, Industrial Relations, Saudi Aramco
ACDEFGH



Evan Bayh
Senior Advisor, Apollo Global Management
ACDEGHJK



Jeffrey C. Campbell
Former Vice Chairman and Chief Financial Officer, American Express Company
ACDEGHJK



Jonathan Z. Cohen
Founder, Chief Executive Officer and President, Hepco Capital Management, LLC
ABCDEFGHIJK



Kimberly N. Ellison-Taylor
Former Executive Director of Finance Thought Leadership, Oracle Corporation
ACDEGHK



Michael J. Hennigan
Executive Chairman, Marathon Petroleum Corporation
ABCDEFGHIK



Maryann T. Mannen
President and Chief Executive Officer, Marathon Petroleum Corporation
ABCDEFGHIH



Eileen P. Paterson
Former Chief Executive Officer and President, Aerojet Rocketdyne Holdings, Inc.
ABCDEFGHIJ



Kim K.W. Rucker
Former Executive Vice President, General Counsel and Secretary, Andeavor
ACDEFGHJK



Frank M. Semple
Former Chairman, President and Chief Executive Officer, MarkWest Energy Partners, L.P.
ACDEFH



J. Michael Stice
Professor, The University of Oklahoma
ABCDEFGHI



John P. Surma
Lead Independent Director, Marathon Petroleum Corporation; Former Chairman and Chief Executive Officer, United States Steel Corporation
ABCDEFGHIJ

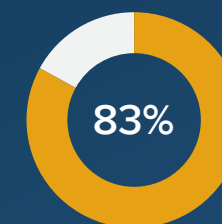
Director Skills and Expertise Key

- A** Senior Leadership
- B** Public Company CEO
- C** Risk Management
- D** Corporate Governance
- E** Finance & Accounting
- F** Energy Industry
- G** International Business
- H** Sustainability
- I** Environmental
- J** Government, Legal & Regulatory
- K** Technology & Cybersecurity

GOVERNANCE HIGHLIGHTS

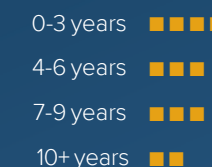
Independent oversight

10 of 12 directors, 83%, are independent.



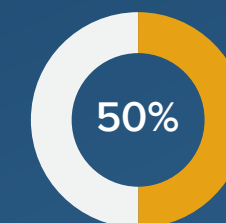
6 years of average tenure

As of Aug. 1, 2025, the average tenure of directors was 6 years.



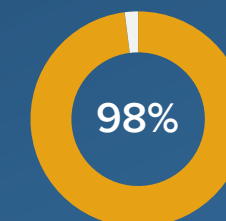
50% gender and/or racial/ethnic diversity

50% of directors are women and/or a racial/ethnic minority or Native American tribal member.



Highly engaged

Director attendance at Board and committee meetings averaged 98% in 2024.



Sustainability Governance

Collaboration and communication among the Board, its committees and MPC leadership are critical to maintaining our aligned direction on sustainability matters. Corporate impacts, risks and opportunities are identified and managed by company leadership with oversight from our Board. The Board has the ultimate responsibility for, and is actively engaged in, overseeing risk. It:

- Reviews strategic risks annually at a designated strategy meeting and on an ongoing basis throughout the year.
- Delegates responsibility for managing certain types of risk to its committees, which report regularly to the Board on activities in their individual areas of oversight.



Key Corporate Governance Practices

Our key corporate governance practices include:

- **Board independence and leadership**
 - 10 of 12 directors are independent
 - Strong independent Lead Director role reinforces effective independent leadership on the Board
 - Three fully independent standing Board committees
- **Director elections**
 - Majority voting standard for uncontested director elections
 - Demonstrated commitment to Board refreshment
 - Directors not elected by a majority of votes cast are subject to the Board’s resignation policy
- **Board practices**
 - Risk oversight by the full Board and its committees
 - Independent directors meet regularly in executive session
 - Annual Board and committee self-evaluations, and peer evaluations of nominees for reelection
- **Shareholder rights and engagement**
 - Shareholder right to call a special meeting of shareholders
 - Shareholder “proxy access” right to submit director nominations for inclusion in our proxy statement
 - Robust year-round shareholder engagement program
- **Sustainability accountability**
 - Strong oversight by the full Board and its committees
 - Industry-leading disclosures on environmental targets and performance
 - Extensive human capital management disclosures, including EEO-1 data

BOARD OF DIRECTORS¹

Audit Committee	Compensation and Organization Development Committee	Corporate Governance and Nominating Committee	Sustainability and Public Policy Committee
RESPONSIBILITIES AND OVERSIGHT:			
<ul style="list-style-type: none"> • Oversees risks associated with financial, financial reporting and accounting matters • Monitors compliance with regulatory requirements and internal control systems • Oversees our enterprise risk management process and reviews performance • Reviews sustainability and climate risk disclosures within the financial reporting framework • Oversees business continuity, data privacy and cybersecurity risks 	<ul style="list-style-type: none"> • Oversees risk associated with our compensation programs, plans and policies to help ensure they do not encourage excessive risk-taking • Oversees our management succession planning process and our human capital management strategies and policies • Oversees stakeholder engagement on compensation and human capital management matters 	<ul style="list-style-type: none"> • Oversees risk associated with corporate governance matters, including director independence, Board composition and succession, Board leadership structure and Board effectiveness • Oversees the evaluation of the Board, its committees and individual directors • Oversees stakeholder engagement on corporate governance matters 	<ul style="list-style-type: none"> • Oversees risks and opportunities associated with sustainability, safety and public policy matters • Reviews our sustainability and climate reports and other key sustainability disclosures • Oversees establishment of our sustainability targets • Oversees governance framework and budgets for our political contributions and lobbying expenditures • Oversees stakeholder engagement related to sustainability and public policy matters

MPC EXECUTIVE LEADERSHIP TEAM

Sustainability is embedded across executive committees with primary responsibility for sustainability strategies and standards

- External Policy Committee
- Health, Environment, Safety, Security & Product Quality Management Committee
- Enterprise Risk Management Committee
- Strategy Steering Committee
- Business Integrity Committee

ORGANIZATIONAL LEADERS

Drives sustainability strategies across the enterprise

- Sustainability Working Group
- Health, Environment, Safety & Security Planning Committee
- Renewables Compliance Governance Committee
- Renewables Council
- Advocacy Steering Committee

CROSS-FUNCTIONAL TEAMS

Implement key sustainability strategies, programs and plans

- Environmental Justice Team
- International ESG Reporting Working Group
- OEMS Center of Excellence
- Focus on Water Team
- Focus on Energy Team
- Enterprise Risk Management Community of Practice
- Renewables Feedstock Compliance Committee

¹ Captures key sustainability-related responsibilities of the Board’s four standing committees. For complete committee descriptions, see Pages 20-21 of our [2025 Proxy Statement](#).

Operational Excellence Management System

As set forth in our policies, standards and procedures and managed through our Operational Excellence Management System (OEMS), we strive to conduct business safely, responsibly and cost effectively. Our OEMS helps us manage risks, internal and external requirements, engage with our stakeholders and further deliver on our sustainability objectives.

We began formalizing our OEMS over two decades ago with adherence to the Responsible Care® management system (RC14001®). RC14001® is built on the globally recognized ISO 14001 environmental management system and includes health, safety and security requirements. The scope of our OEMS goes beyond alignment with RC14001® and also aligns with ISO 9001, which incorporates quality and an increased focus on a process approach and engagement.

100% of our operations — including all refineries, renewable fuels facilities, terminals, pipeline locations, transport and rail facilities, processing plants, marketing and marine operations — are in scope of our OEMS, which has been third-party reviewed for alignment with RC14001® and ISO 9001

Continual Improvement through OEMS

Our OEMS outlines the requirements that will enable us to achieve our goals, improve our performance and lead to long-term success. It provides an iterative process and tools to continually improve the work we do through maintaining operational discipline and speaking up with ideas and concerns. We apply performance-based standards that complement our OEMS and establish organizational expectations. We also periodically review and update these standards to reflect changes in laws or regulations, incorporate recommendations arising from audits and incident investigations, and integrate stakeholder feedback to continually improve our performance.

OEMS Governance

The Health, Environment, Safety, Security and Product Quality Management Committee, comprising executive leadership team members, oversees the companywide implementation of our OEMS.

Companywide OEMS Tools and Resources

- **OEMS Playbook:** Published to further embed our OEMS across the company and provide employees with resources that support continual improvement and risk management.
- **OEMS Center of Excellence:** A companywide forum of about 30 employees tasked with sharing best practices and lessons learned, ensuring management system approaches across MPC and MPLX align with the OEMS framework and promoting continuous improvement of HESS&PQ performance. This group also reviews and develops internal and external audit recommendations and creates OEMS awareness content and training for use companywide.
- **Continuous Improvement Community of Practice:** A group of more than 25 employees who serve to strengthen cross-functional collaboration among organizations to support operational excellence. The group focuses on promoting the use of continuous improvement tools and learning opportunities — including leveraging the OEMS framework.
- **OEMS Awareness Videos:** Created for use companywide to improve employee awareness and understanding of the OEMS framework and structured Plan, Do, Check, Act continual improvement process.
- **Employee Feedback:** Employees are encouraged to provide MPC and MPLX with continual improvement ideas by emailing sustainability@marathonpetroleum.com.

↗ To view our OEMS Playbook, please visit our [website](#).

It is important to talk about how we use our OEMS and its successes within the Natural Gas and NGL Services organization. OEMS shows us what is and isn't working, providing a process 'state of the union.' This keeps management informed and helps drive improvement where needed.

NIC RONIGER

Facility Integrity Senior Manager

Enterprise Risk Management

A comprehensive Enterprise Risk Management (ERM) program is applied across the company to identify, assess and manage enterprise-level risks and review the effectiveness of risk-mitigation strategies. Enterprise-level risks include sustainability risks and topics such as climate change, stakeholder concerns and compliance obligations, as well as other sustainability-related risks as deemed appropriate. We describe additional risks in our Annual Report on Form 10-K and in other filings with the Securities and Exchange Commission.

Emerging Risk Identification

Our continuous and dynamic ERM process involves a cross-functional review of potential, emerging enterprise-level risks, including risks related to sustainability. Our enterprise risk manager leads the process with quarterly executive workshops that involve key leaders who are responsible for the implementation of risk mitigation strategies. Our risk analysis includes an examination of the causes, consequences and interconnectivity of each enterprise-level risk, as well as the development of strategies to mitigate risks — imminent and potential — and position us to capitalize on new opportunities.

Climate-Related Risk Management

We carefully review, evaluate and manage climate-related risks and opportunities to enable us to adapt and strengthen our resiliency. These include both transitional and physical risks that we routinely discuss with the Board's Sustainability and Public Policy Committee and executive and senior leadership committees.

↗ For more information on how we manage climate-related risks and opportunities and the role cross-functional committees play, please see Page 7 of our annual [Perspectives on Climate-Related Scenarios report](#).

Regulatory Risk Oversight

As part of our ERM process, our Board also oversees risks related to the regulatory landscape. That includes emerging and proposed regulations related to issues such as public and employee health and safety, climate change and GHG emissions, solid and hazardous waste management and permitting.

Risk Governance

The ERM Community of Practice supports the ERM Committee and comprises mid-level risk and assurance representatives and subject-matter experts across our enterprise. This group meets quarterly to discuss, develop, standardize and integrate risk management best practices while supporting risk-based decision-making.

Our Board of Directors and executive leadership team routinely review and discuss enterprise-level risks and strategies. The Board's Audit Committee further reviews our ERM process and performance trends and oversees internal controls and audits to evaluate their effectiveness.

Material Risk Disclosure

Material risks to our company are disclosed under the caption Risk Factors in our most recent Annual Report on Form 10-K and other filings with the Securities and Exchange Commission. Categories of risk described in these reports include business and operational risks, financial risks, legal and regulatory risks, and general risk factors.

Roles and Responsibilities

BOARD OF DIRECTORS

- Oversees and reviews ERM strategies and performance

ERM COMMITTEE

- Directs ERM progress for identifying, assessing and managing enterprise-level risks
- Drives performance of risk-mitigation strategies

ERM COMMUNITY OF PRACTICE

- Supports ERM Committee to develop, standardize and integrate risk management best practices throughout the company

Compliance and Ethics

We are committed to conducting business with the highest standards of integrity and ethical conduct and in compliance with applicable laws and regulations. Our Compliance and Ethics Program is designed to ensure all employees act legally and ethically, and that they can report concerns without fear of retaliation.

Roles and Responsibilities

CHIEF COMPLIANCE OFFICER

- Oversight of Compliance and Ethics

BUSINESS INTEGRITY COMMITTEE

- Promotes the effectiveness of enterprisewide Compliance and Ethics program

SENIOR MANAGEMENT

- Charged with managing risks relating to legal compliance and business ethics

Compliance and Ethics Program Policies

MPC provides key corporate policies that relate to our Compliance and Ethics Program on our website.

- Anticorruption
- Anti-Retaliation for Reporting Illegal or Unethical Conduct
- Conflicts of Interest
- Equal Employment Opportunity
- Harassment and Appropriate Workplace Conduct
- Policy on Human Rights, Including the Rights of Indigenous People
- Whistleblowing as to Accounting Matters

↗ To view these policies and our Code of Business Conduct, please visit our [website](#).

Code of Business Conduct

Our Code of Business Conduct, referred to as the "Code," is approved by the Board of Directors and based on the core principle that we always strive to do the right thing. It is a guide for making sound business decisions by setting clear expectations for ethical decision-making, accountability and responsibility. It focuses on the responsibility all employees have to the public, to shareholders, and to our business partners and on our obligation to adhere to applicable law.

The Code requires all employees to immediately report any suspected illegal or unethical conduct connected with the business of MPC or its affiliates. It also makes clear that retaliation against individuals for such reporting is never acceptable.

The Code applies to:

- All MPC employees, including all employees of consolidated subsidiaries and MPC employees who provide services to MPLX.
- All officers and other senior executives of MPC and the general partner of MPLX.
- All members of the Boards of Directors of MPC and the general partner of MPLX.
- Business partners — including suppliers, consultants and contract workers — are expected to act consistently with the Code and applicable law, and to support effective compliance programs in their own organizations. Certain suppliers also must comply with our Supplier Code of Conduct. We communicate our expectations to these business partners annually.

Code Audits and Compliance

Our performance under the Code is audited annually. This audit includes specific testing of processes related to business expenses, conflicts of interest, employee disclosures, anticorruption compliance, insider trading, aircraft usage and officer business expense reports. Objectives in these categories are reviewed and tested by MPC's Audit Assurance and Advisory Services organization in conjunction with other company organizations.

Code Training and Certification

New employees complete Code training upon hire and must answer a questionnaire designed to help them identify and consider potential conflicts of interest as they begin employment.

All employees complete Code training every 24 months. Additionally, salaried employees complete an annual certification, which provides a mechanism to report potential conflicts of interest or other potential violations of the Code. By completing the certification, employees acknowledge they have read, understand, and have made their best efforts to fully comply with the Code.

Code of Ethics for Senior Financial Officers

The president and chief executive officer, executive vice president and chief financial officer, vice president and controller, vice president treasury and other leaders performing similar roles at MPC and MPLX are subject to our Code of Ethics for Senior Financial Officers. This additional code affirms the principles of honesty, integrity and sound judgment that we expect of senior executives who are responsible for preparing and certifying our financial statements.

All senior financial officers must complete an annual certification to attest that they have not acted in violation of the Code of Ethics. By completing this certification, they are committing to comply with the Code of Ethics on behalf of themselves and employees under their supervision.

Anticorruption Program

Our Anticorruption program emphasizes our commitment to conducting our business and operations with the highest level of integrity. Bribes of all nature are strictly prohibited, and guidance is available by policy on the exchange of business courtesies.

All employees receive anticorruption education through the Code training upon hire. Further, those with job functions identified as having greater corruption risk exposure receive additional training on a routine basis, at least every 24 months.

2024 COMPLIANCE AND ETHICS HIGHLIGHTS

100% of salaried MPC employees completed the Code of Business Conduct certification

99.3% of MPC employees hired in 2024 completed Code of Business Conduct training

100% MPC and MPLX senior financial officers completed the Code of Ethics for Senior Financial Officers certification



24/7 Anonymous Integrity Helpline

MPC's Integrity Helpline enables employees, business partners, community members and others to ask questions or raise allegations related to workplace behavior or ethics. While all our employees are encouraged to speak with their immediate supervisors or Human Resources representatives if they have questions or concerns related to ethics and the Code, the helpline is an additional avenue to do so anonymously. We maintain a no-retaliation policy and never permit adverse action against individuals making a submission in good faith.

Those contacting the Integrity Helpline with a report of misconduct can expect:

- To be given the opportunity to remain anonymous.
- The matter to be assigned an investigator.
- To be provided an access code for checking case status and updates and for communicating with our Business Integrity and Compliance representatives and investigators.
- The matter to be investigated in a manner and to the extent appropriate based on the nature of the allegation.
- The report to be handled promptly, discreetly and professionally with the identity of the reporter protected.
- To be contacted when the investigation is complete.

Our goal is to resolve all matters within 90 days. When warranted, investigations may result in a change in policy or procedure, a determination that an allegation could not be substantiated, or disciplinary action. Disciplinary levels range from coaching and counseling to more formal written warnings, suspension or even termination. In determining the appropriate response, we strive to balance consistent application with the weighing of specific facts and circumstances. Misconduct also may result in a lower performance rating and adversely impact an employee's merit increase and bonus opportunity.

Allegation statistics are reported to the Audit Committee of the Board of Directors twice per year. In responding to any allegation of a violation of our Code of Business Conduct or the Code of Ethics for Senior Financial Officers, our chief compliance officer has direct access to the Board's independent Lead Director, president and chief executive officer, chief financial officer, vice president of Audit and the chair of the Board's Audit Committee.

ETHICS AT THE FOREFRONT

We inform and educate employees through various initiatives, including newsletters that cover topics like conflicts of interest, data privacy, insider trading and political activity, as well as features like "It Happened Here" and "Glad You Asked." In addition, we have local Business Integrity Partners who serve as ethical role models by providing resources, facilitating the reporting of misconduct, directing inquiries and supplementing employee training.

MPC highlights the significance of compliance and ethics during Corporate Compliance and Ethics Week. This week provides an opportunity for leaders and employees to reflect on the importance of integrity in the workplace and its lasting effect on our company culture. In 2024, over 1,900 employees participated in a poll, providing valuable feedback on our Compliance and Ethics program.

- **99%** said MPC clearly communicates its expectations of ethical behavior.
- **99%** understand how the Code of Business Conduct applies to them in the roles they perform.
- **95%** feel it is safe to speak up at MPC.
- **89%** feel confident something would be done about unethical behavior when reported.

Political Contributions and Advocacy

We believe participating in the political process is an essential part of advancing the meaningful exchange of information and views on issues that affect our company and our stakeholders.

MPC takes part in the political process in several ways, including lobbying, grassroots activity, issue advocacy, participating in trade associations, supporting an active employee political action committee and, where lawful, directly supporting political candidates and ballot issues. All these activities are subject to the oversight of our Board of Directors, its Sustainability and Public Policy Committee, and senior management.

Engagement Principles

In our political engagement efforts, we focus on maintaining a strong business presence across the regions in which we operate and continuing to meet the energy needs of consumers with competitive prices while protecting the value of our shareholders' investments. As such, we support people and policies that promote energy security; encourage free market principles, including technology neutrality; provide a balanced, science-based approach to issues; and support our Core Value of Safety and Environmental Stewardship and our commitment to sustainability.

Because MPC is an integrated company that processes, refines, markets and transports natural gas, petroleum and petroleum products, and is one of the largest producers and marketers of renewable diesel in the U.S., we engage on those issues that touch the company and our stakeholders. MPC has interests in many topics, including those that affect statutory and regulatory compliance for business, environment, safety and security, as well as those issues that impact employees, communities and the overall evolution of our industry.

Trade Associations

Taking part in trade associations is an important part of our role as an active member of our industry and business communities. Through trade associations, we engage in the development of industry standards and practices and share advances in science, engineering, safety, stakeholder engagement, training, certifications, research and more.

When engaging on issues, including but not limited to climate, we encourage our trade associations to take positions that are consistent with our engagement principles, including our commitment to sustainability.

Disclosures

We recognize that our public policy activities are of interest to our stakeholders. We publicly report information for each of the past five years for the following:

- Federal lobbying disclosure, including links to the websites of the Clerk of the U.S. House of Representatives and the Secretary of the U.S. Senate where our quarterly federal lobbying reports can be obtained via a search of "Marathon Petroleum," as well as expenses relating to federal lobbying activity.
- State lobbying disclosure, including a map showing the states where we have registered as an employer or principal of lobbyists, links to each state's lobbying reporting site and an approximate total of state-reported lobbying expenditures.
- Employee political action committee reports showing federal and state-level contributions.
- Corporate political contribution reports showing contributions made from company treasury funds.
- A report of trade associations with dues of \$50,000 or greater and that may engage in lobbying activities, the range of dues paid to each organization, as well as amounts attributable to federal lobbying or state and grassroots lobbying and advertising.
- A report of contributions to social welfare organizations for lobbying and/or advocacy purposes, beginning with 2022 contributions.

➤ For more information, please visit the [Political Engagement page of our website](#).



Cybersecurity and Privacy

We have processes in place designed to protect our information systems, data, assets, infrastructure, and computing environments from cybersecurity threats and risks while ensuring confidentiality, integrity, and availability. These enterprisewide processes are based on policies, practices, and standards that guide the identification, assessment, and management of cybersecurity risks.

Threat Awareness and Prevention Training

Threat awareness and prevention training begins when an employee is hired and continues throughout their tenure through training and communications delivered across multiple channels, including weekly newsletters, digital signage, events celebrating Cybersecurity Awareness Month and role-based training.

Our employees and contractors are provided annual computer-based cybersecurity awareness training covering several key cybersecurity principles, such as identity protection, incident reporting, safe internet usage and mobile device security.

We employ a simulated email phishing program to aid in the protection of our systems and networks against email-based cybersecurity threats. Account users routinely receive simulated phishing emails throughout the year to assess their ability to identify and report suspicious emails. An account user who inappropriately interacts with any such email is provided immediate feedback. Repeated failures result in additional training and are escalated to the account user's supervisor who may then take appropriate action.

99% of our employees completed cybersecurity awareness training

100% of account users received simulated phishing emails

Cybersecurity Risks

We utilize layers of defensive measures designed to facilitate resilience, minimize attack surfaces, and provide flexibility and scalability in our proficiency to address cybersecurity risks and threats. Security limits are placed on physical and network access to our information technology (IT) and operational technology (OT) systems and network environments, including limiting remote network access.

Internal IT and OT controls are designed to detect cybersecurity threats by collecting and analyzing data in our centralized cybersecurity operations center (CSOC). Our personnel are trained to report suspicious incidents and cybersecurity threats to our IT Service Desk, where they are screened and then escalated to our CSOC for appropriate action.

We engage with external resources to contribute to and provide independent evaluation of our cybersecurity practices, including an annual assessment of our cybersecurity program performed by a third party against the National Institute of Standards and Technology (NIST) Cybersecurity Framework.

We manage third-party service provider cybersecurity risks through contract management, evaluation of applicable security control assessments and third-party risk assessment processes.

Governance and Compliance

We apply an enterprise risk management (ERM) methodology established and led by our executive leadership team to identify, assess and manage enterprise-level risks. Our cybersecurity risk program directly integrates and is intended to align with our governing ERM program. Our full Board of Directors oversees enterprise-level risks and has delegated to the Audit Committee of our Board oversight of risks from cybersecurity threats, informed by the ERM program.

Our Chief Digital Officer (CDO) and Chief Information Security Officer (CISO) are standing members of the ERM Committee, comprised of members of senior management. As part of the committee, these individuals report on and evaluate cybersecurity threats and risk management efforts, as communicated to them by way of their direct reports and the larger cybersecurity team. The CDO and CISO provide cybersecurity briefings to the Board of Directors and the Audit Committee as needed, with a minimum of two briefings per year. The Audit Committee further reviews and provides input on our cybersecurity and information security strategy.

Our cybersecurity leadership and operational teams monitor cybersecurity threat intelligence and applicable cybersecurity regulatory requirements in a variety of ways, including by communicating with federal agencies, trade associations, service providers and other third-party resources. Our management team, through consultation with our CDO, CISO and the Audit Committee of our Board, uses the information gathered from these sources to inform long-term cybersecurity investments and strategies that seek to identify, protect, detect, respond to and recover from cybersecurity incidents.

Our Computer Security Policy governs cybersecurity efforts and supports compliance with legal requirements. The policy is implemented through a governance process that includes standards, procedures, risk management, defense strategy and compliance reviews.

Our cybersecurity policies apply to personnel and third parties that own, manage, administer, support, develop or work on company information systems and to all our computing environments, whether connected to or segregated from our corporate network. All such personnel have access to our cybersecurity policies. We emphasize policy awareness through training and supervisor engagement and implement policy compliance through a structured escalation program as needed.

Our Code of Business Conduct further addresses protection of company assets, information systems, social media, business records retention and confidential information.

Privacy

Protecting all personal data is a priority. We are committed to complying with applicable privacy laws, as well as privacy regulations and safeguards that have been applied to our operations. We adhere to the Payment Card Industry Data Security Standard, which provides requirements that protect payment card account data of our customers. A third-party assessor is annually engaged to assess compliance.

Incident Preparedness and Response

Our cybersecurity resiliency is evaluated using several methods, such as penetration testing; tabletop exercises with varying scenarios and participants, including operations teams and executive leadership; business continuity drills to ensure the safe operation of critical assets; and analysis of the corporate cybersecurity incident response plan.

