# EXECUTE WITH INTEGRITY

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

41 Accountable and Transparent Governance

# 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.

Effective January 1, 2026, the Board elected Maryann T. Mannen, our President and CEO and member of the Board, as Chairman of the Board. John P. Surma continues to serve as independent Lead Director.

In June 2026, Board member Abdulaziz F. Alkhayyal passed away. His commitment and service to MPC will be greatly missed.

↗ **For information about the individuals serving on the MPLX Board of Directors, please visit the MPLX website.**

*Pictured left to right*

| | | |
|---|---|---|
| **Jeffrey C. Campbell** | Former Vice Chairman and Chief Financial Officer, American Express Company | A C D E G H I K |
| **J. Michael Stice** | Professor, The University of Oklahoma | A B C D E F G H I |
| **Kim K.W. Rucker** | Former Executive Vice President, General Counsel and Secretary, Andeavor | A C D E F G H J K |
| **John P. Surma** | Former Chairman and Chief Executive Officer, United States Steel Corporation | A B C D E F G H I J |
| **Maryann T. Mannen** | Chairman, President and Chief Executive Officer, Marathon Petroleum Corporation | A B C D E F G H |
| **Kimberly N. Ellison-Taylor** | Former Executive Director of Finance Thought Leadership, Oracle Corporation | A C D E G H K |
| **Jonathan Z. Cohen** | Founder, Chief Executive Officer and President, Hepco Capital Management, LLC | A B C D E F H J K |
| **Eileen P. Paterson** | Former Chief Executive Officer and President, Aerojet Rocketdyne Holdings, Inc. | A B C D E G H J |
| **Evan Bayh** | Senior Advisor, Apollo Global Management | A C D E G H J K |
| **Frank M. Semple** | Former Chairman, President and Chief Executive Officer, MarkWest Energy Partners, L.P. | A B C D E F H |

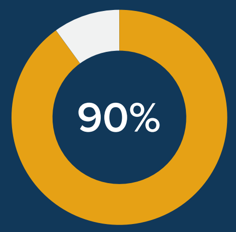
**Director Skills and Expertise Key**

- **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**

9 of 10 directors, 90%, are independent.




**6.8 years of average tenure**

As of August 1, 2026, the average tenure of directors was 6.8 years.

| | |
|---|---|
| 0-3 years | ■■■■ |
| 4-6 years | ■ |
| 7-9 years | ■■■ |
| 10+ years | ■■ |

**Sustainability experience**

100% of directors have expertise in sustainability.


**Highly engaged**

Director attendance at Board and committee meetings averaged 100% in 2025.

## 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 accomplishes this by reviewing strategic risks annually at a designated strategy meeting and on an ongoing basis throughout the year, and by delegating responsibility for managing certain types of risk to its committees. Those committees 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**
  - 9 of 10 directors are independent
  - Experienced, independent Lead Director role reinforces effective independent leadership on the Board
  - Four fully independent standing Board committees
  - Independent directors meet regularly in executive session without management present
- **Accountability**
  - Majority voting standard for uncontested director elections
  - Annual Board and committee self-evaluations, and individual evaluations of nominees for reelection
  - Demonstrated commitment to Board refreshment
  - Directors not elected by a majority of votes cast are subject to the Board's resignation policy
  - Annual evaluation of CEO performance and compensation by independent directors
- **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
- **Board best practices**
  - Business strategy and risk oversight by the full Board and its committees
  - CEO and executive leadership succession planning by the full Board
  - Board and committee oversight of sustainability, safety and public policy matters
  - Significant stock ownership requirements for non-employee directors
  - Limits on directors' outside commitments

[1] Captures key sustainability-related responsibilities of the Board's four standing committees. For complete committee descriptions, see Pages 21-22 of our 2026 Proxy Statement.

### BOARD OF DIRECTORS

**Provides oversight and guidance on the company's strategy and planning**

| Audit Committee | Compensation and Organization Development Committee | Corporate Governance and Nominating Committee | Sustainability and Public Policy Committee |
|---|---|---|---|
| Oversees risks associated with financial, financial reporting and accounting matters<br>Monitors compliance with regulatory requirements and internal control systems<br>Oversees our enterprise risk management process and reviews performance<br>Reviews sustainability and climate risk disclosures within the financial reporting framework<br>Oversees business continuity, data privacy and, in conjunction with the Board, cybersecurity risks | Oversees risk associated with our compensation programs, plans and policies to discourage excessive risk-taking<br>Oversees our management succession planning process and our human capital management strategies and policies<br>Oversees stakeholder engagement on compensation and human capital management matters | Oversees risk associated with corporate governance matters, including director independence, Board composition and succession, Board leadership structure and Board effectiveness<br>Oversees the evaluation of the Board, its committees and individual directors<br>Oversees stakeholder engagement on corporate governance matters | Oversees risks and opportunities associated with sustainability, safety and public policy matters<br>Reviews our sustainability and climate reports and other key sustainability disclosures<br>Oversees establishment of our sustainability targets<br>Oversees governance framework and budgets for our political contributions and lobbying expenditures<br>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 and Product Quality Management Committee; Enterprise Risk Management Committee; Strategy Steering Committee; Business Integrity Committee; Community Investment Executive Oversight Committee

### ORGANIZATIONAL LEADERS

**Implement key sustainability strategies, programs and plans**

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

### CROSS-FUNCTIONAL TEAMS

**Implement key sustainability strategies, programs and plans**

OEMS Center of Excellence; Focus on Water Team; Focus on Energy Team; Enterprise Risk Management Community of Practice; Renewables Feedstock Compliance Committee; Community Investment Steering Committee

## Operational Excellence Management System

As outlined in our policies, standards and procedures and managed through our Operational Excellence Management System (OEMS), we are committed to conducting 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 the OEMS in adherence to the Responsible Care® management system (RC14001®) nearly 25 years ago. RC14001® is built on the globally recognized ISO 14001 environmental management system and includes health, safety and security requirements. Today, the scope of the OEMS goes beyond alignment with RC14001® and also aligns with ISO 9001, which incorporates quality and an increased emphasis on a process approach and engagement.

**100% of our operations are in scope of the OEMS, which has been third-party reviewed for alignment with RC14001® and ISO 9001.**

**This includes all refineries, renewable fuels facilities, terminals, pipeline locations, transport and rail facilities, processing plants, marketing and marine operations.**

### Continual Improvement through OEMS

Our OEMS supports strong performance and long-term success. It provides a framework and tools for continuous improvement by reinforcing operational discipline and encouraging employees to raise ideas and concerns. We apply performance-based standards that complement the 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.

### OEMS Governance

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

### Companywide OEMS Tools and Resources

- **OEMS Playbook:** Published to further communicate and embed the OEMS across the company.
- **OEMS Center of Excellence:** A companywide forum of 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 HESS&PQ performance improvement. 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:** An experienced group of continuous improvement professionals who serve to strengthen cross-functional collaboration among organizations in support of operational excellence. The group focuses on promoting the use of continuous improvement tools and learning opportunities, including leveraging the OEMS framework.
- **Maturity Evaluation:** OEMS maturity tools support qualitative and quantitative assessments of processes and programs across current and desired future states. They identify potential gaps, guide improvement discussions and support goals for process and program enhancements over time.
- **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.**

**"OEMS provides us with a structured way to talk about how we run our business and provides us with practical tools that help us get better as we go. OEMS doesn't give you the answer, but rather the means to get to the answer together."**

**Ed Cimaroli**

Operations Support Services Senior Director

## Enterprise Risk Management

A comprehensive Enterprise Risk Management (ERM) program is in place 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.

### 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 ERM Committee meetings that involve key leaders who are responsible for the implementation of risk mitigation strategies. Risk analysis involves 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.

One emerging risk identified in our 10-K is the integration of artificial intelligence (AI) technologies into our processes. Our AI Governance Policy sets the standard for how we interact with such applications to ensure ethical, lawful and responsible use.

### 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 9 of our annual Perspectives on Climate-Related Scenarios report.**

### Regulatory Risk Oversight

As part of the 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, permitting, maximum refining margins, windfall profits tax, and similar penalties and restrictions.

### 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 effectiveness.

**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

### 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.

# Compliance and Ethics

We are committed to conducting business with the highest standards of integrity and ethical conduct and in full compliance with applicable laws and regulations. Our Compliance and Ethics Program establishes clear expectations for ethical behavior, promotes accountability across the organization, and provides employees and business partners with safe and accessible channels to raise concerns without fear of retaliation.

Oversight of the Compliance and Ethics Program begins with our Board of Directors and is reinforced through executive leadership accountability and independent assurance mechanisms. Together, these elements help ensure that ethical decision-making is embedded in how we operate and how we engage with stakeholders.

**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

Our Compliance and Ethics Program is supported by a comprehensive framework of corporate policies that address key ethical, legal and human rights considerations. These policies include:

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

In 2025, all MPC and MPLX policies administered by the chief compliance officer were reviewed and updated. These updates simplify how we communicate compliance expectations, introduce clearer examples to demonstrate key concepts and reinforce the importance of ethical business conduct.

↗ **To view these policies and our Code of Business Conduct, please visit our website.**

## Code of Business Conduct

Our Code of Business Conduct is approved by the Board of Directors and sets clear expectations for ethical decision-making, accountability and compliance with applicable laws. Grounded in our commitment to doing the right thing, the Code serves as a practical guide for employees and leaders as they conduct business and make decisions on behalf of the company.

The Code reinforces the responsibility employees have to the public, our shareholders and our business partners. It requires the prompt reporting of suspected illegal or unethical conduct related to MPC or its affiliates and clearly prohibits retaliation against individuals who raise concerns in good faith.

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. They 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. Expectations are communicated to these business partners.

### Code Audits and Compliance

Compliance with the Code is audited annually through risk-based testing of key processes, including business expenses, conflicts of interest, employee disclosures, anticorruption compliance, insider trading safeguards, aircraft usage and officer business expense reports.

These audits are conducted by MPC's Audit Assurance and Advisory Services organization, in coordination with other internal functions, and are designed to assess program effectiveness, strengthen internal controls and identify opportunities for continuous improvement.

### Code Training and Certification

New employees are required to complete Code training upon hire, including a questionnaire designed to identify and consider potential conflicts of interest.

All employees complete Code training at least every 24 months, and salaried employees must complete an annual certification affirming they have read, understand and made their best efforts to comply with the Code. The certification process also provides a formal mechanism for disclosing potential conflicts of interest or violations of 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 of 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 reinforces the principles of honesty, integrity and sound judgment expected of executives responsible for the preparation and certification of our financial statements.

Senior financial officers must complete an annual certification attesting that they have not acted in violation of the Code of Ethics and affirming their commitment to comply with the Code of Ethics on behalf of themselves and the employees under their supervision.

## Anticorruption Program

Our Anticorruption Program reflects our commitment to conducting our business and operations with the highest level of integrity. Bribery in any form is strictly prohibited, and employees are provided with clear guidance regarding permissible business courtesies. Anticorruption education is included in Code training for all employees, and individuals in roles with higher corruption risk exposure receive additional, risk-based training at least every 24 months.

**2025 COMPLIANCE AND ETHICS HIGHLIGHTS**

**100%**

**of salaried MPC employees completed the Code of Business Conduct certification.**

**99.9%**

**of MPC employees hired in 2025 completed Code of Business Conduct training[1].**

**100%**

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

[1] Completion rates below 100% may reflect employee leaves of absence, separations, delayed completion into the following year or, in rare cases, noncompliance.

## 24/7 Anonymous Integrity Helpline

MPC maintains a 24/7 Anonymous Integrity Helpline that enables employees, business partners, community members and others to ask questions or report concerns related to workplace behavior or ethics. While we encourage employees to raise questions or concerns related to ethics and the Code with their supervisors or Human Resources representatives, the helpline is an additional avenue to do so anonymously. We maintain a strict no-retaliation policy and do not permit adverse action against individuals who make reports in good faith.

Individuals who contact the Integrity Helpline 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 updates, and for communication 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.
- To be contacted when the investigation is complete.

Investigations may result in policy or procedural changes or disciplinary action, where warranted, or a determination that an allegation could not be substantiated. Disciplinary actions may include coaching, written warnings, suspension or termination, and misconduct may also affect performance evaluations and merit-based compensation. In all cases, we seek to balance consistent application with careful consideration of the specific facts involved.

Allegation statistics are reported to the Audit Committee of the Board of Directors twice annually. In responding to alleged violations 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 Board's chair of the Audit Committee.

## Ethics at the Forefront

We reinforce ethical decision-making and a strong speak-up culture through ongoing education and engagement across the organization. Employees receive regular communications, including targeted newsletters and features that explore key topics, such as conflicts of interest, data privacy, insider trading and political activity. These efforts help ensure employees understand their responsibilities and feel confident applying our Code of Business Conduct in their day-to-day roles.

Local Business Integrity Partners serve as ethical role models throughout the organization by providing resources, facilitating the reporting of concerns, directing inquiries and supplementing employee training. Together, these initiatives support accountability, transparency and consistent ethical behavior across our operations.

We also highlight the importance of integrity during Corporate Compliance and Ethics Week, which provides leaders and employees an opportunity to reflect on ethical decision-making and its role in sustaining a strong company culture. In 2025, more than 1,800 employees participated in a companywide poll, offering 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.
- **90%** feel confident something would be done about unethical behavior when reported.

**↗ For more information, please visit the Political Engagement page of our website.**

# 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 prioritize 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 candidates 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 primarily on issues that touch those products and activities. We also engage on matters involving regulatory compliance for business, environment, safety and security, as well as other issues that impact our employees, the communities in which we operate 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 and research.

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 for "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.

### ADVOCACY IN ACTION

California refineries are among the most expensive to operate in the world. Costs led to two non-MPC refinery closures there in the last year. In-state fuel demand already outpaces in-state production, and these closures result in a more volatile fuel supply system and greater reliance on imports. Shifting to imported fuel threatens national security. It also increases global GHGs when fuel is produced by refineries in other states or countries with less stringent regulations and lower regulatory costs with increased shipping emissions. These unintended outcomes undermine the state's objectives and introduce significant uncertainty and risk into our California operations. We advocate for state regulatory clarity to support business planning so we can continue to receive and provide long-term value in the California market.

## Cybersecurity and Privacy

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

**In 2025, Mary Rose Martinez, Chief Information Security Officer (CISO) and VP of Infrastructure at MPC, was recognized with the prestigious CISO ORBIE Award. This award recognizes CISOs who drive business transformation and industry impact, and highlights Martinez's leadership shaping Marathon's cybersecurity strategy, strengthening the resilience of IT infrastructure and fostering a culture of innovation.**

### Threat Awareness and Prevention Training

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

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.

**99%**

**of our employees completed cybersecurity awareness training**

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.

**Cyber Champions**

As we foster a strong, sustainable cybersecurity culture, our first cohort of Cyber Champions recently graduated from our new, comprehensive training program. Open to employees across the company at all levels, the program builds the knowledge, skills and resources needed to safeguard critical infrastructure and navigate an evolving threat landscape. Champions complete targeted trainings, interact in workshops and participate in site tours that reinforce operational due diligence.

### Cybersecurity Risks

We use layered defenses to strengthen resilience, reduce attack surfaces and scale our ability to manage cybersecurity risks. 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. This includes 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.

**Roles and Responsibilities**

**BOARD OF DIRECTORS**

- Oversees enterprise level risks

**AUDIT COMMITTEE OF BOARD OF DIRECTORS**

- In conjunction with the Board, oversees risks from cybersecurity threats informed by ERM Committee
- Provides input on cybersecurity and information security strategy

**ERM COMMITTEE**

- Develops, standardizes and integrates risk-management best practices
- Reports on and evaluates threats and risk-management initiatives
- Chief Digital Officer and Chief Information Security Officer, standing members of the committee, brief Audit Committee and Board of Directors as needed, at minimum twice per year

**LEADERSHIP AND OPERATIONAL TEAMS**

- Monitors threat intelligence and regulatory requirements
- Communicates with federal agencies, trade associations, service providers and other third parties
- Consults with these third parties to inform long-term investments and strategies to protect from, detect, identify, respond to and recover from cybersecurity incidents

**Policies**

Our Computer Security Policy governs cybersecurity initiatives and legal compliance through standards, procedures, risk management, defense strategy and compliance reviews. It applies 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. Awareness is reinforced through training, supervisor engagement and structured escalation as needed.

We also maintain an AI Governance Policy that establishes a framework requiring centralized review and approval of AI use cases and oversight by a cross-functional governance committee.

**100%**

**of account users received simulated phishing emails**

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

**Privacy**

Protecting 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. We annually engage a third party 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.