

About NAVEX

What is EthicsPoint?

EthicsPoint is a confidential reporting tool managed by NAVEX, an independent third-party organization. The tool provides an initial point of contact for reporting a concern – or ask a question – when other speak up channels don't feel right.

Why do we need a system like EthicsPoint?

- By creating open channels of communication, CITGO can promote a positive work environment.
- An effective reporting system will strengthen efforts to foster a CITGO culture of integrity and ethical decision-making.

Reporting – General

How can I make a report?

You can file a confidential report by using the Integrity Helpline in two ways:

Phone Intake: 800 252 4846

Web Intake from your mobile device or computer: [Integrity Helpline](#)

You can remain anonymous by choosing that option when making a report.

What type of situations should I report?

The Integrity Helpline is designed for employees to report conduct that is inconsistent with our Values, breaches of the Code of Business Conduct and Ethics (Code), violation of laws and regulations or ask questions.

If I see a violation, shouldn't I just report it to my manager, security, or human resources and let them deal with it?

You should bring any concerns forward to your direct manager or other reporting channel (i.e., Ethics and Compliance Office, Legal Affairs, Local E&C Ambassador or HR). There may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that we have established the Integrity Helpline with NAVEX.

Why should I report what I know? What's in it for me?

We all have the right to work in a positive environment and with that right comes the responsibility of acting in an ethical manner.

Asking questions and raising concerns gives CITGO an opportunity to correct wrongdoing and improve internal process and controls and supports company values and ethical behavior.

Does management really want me to report?

CITGO *needs* you to report. Reporting can minimize the potential negative impact on our people and Company. Reporting may help identify issues that can improve the CITGO culture.

Where do these reports go? Who can access them?

Reports to the Integrity Helpline are entered directly on the NAVEX secure server to prevent any possible breach in security. NAVEX makes these reports available only to specific individuals within CITGO who are charged to ensure reports are thoroughly and objectively evaluated.

Reporting Security & Confidentiality

It is my understanding that any report I send from a company computer generates a server log that shows every website that my PC connects with, and won't this log identify me as a report originator?

NAVEX does not generate or maintain any internal connection logs with IP addresses, so no information linking CITGO provided devices to NAVEX is available. In fact, NAVEX is contractually committed not to pursue a reporter's identity.

If you feel uncomfortable making a report on your company provided device, you have the option of using an electronic device outside the work environment.

Can I file a report from home and remain anonymous?

A report from home, a neighbor's device, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the NAVEX system strips away Internet addresses so that anonymity, if desired, is maintained. Again, NAVEX is contractually committed not to pursue a reporter's identity.

I am concerned that the information I provide through the Integrity Helpline will reveal my identity. How can you assure me that will not happen?

The Integrity Helpline maintained by the NAVEX system is designed to protect your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years...".

Is the telephone toll-free helpline confidential and anonymous too?

Yes. You will be asked to provide the same information that you would provide in an Internet-WEB based report and an interviewer will type your responses into the NAVEX Web site. These reports have the same security and confidentiality measures applied to them during delivery.

What if I want to be identified with my report?

There is a section in the report for identifying yourself if you wish.

Tips & Best Practices

I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?

CITGO chooses to promote ethical behavior. All unethical conduct, at any level, hurts the Company and all employees, including you.

I am not sure if what I have observed or heard is a violation of company policy, or involves unethical conduct, but it just does not look right to me. What should I do?

File a report. NAVEX can help you prepare and file your report so it can be properly understood. It is better to report a situation that turns out to be harmless than let possible unethical behavior go unchecked.

What if my boss or other managers engage in a violation? Won't they get the report and start a cover-up?

NAVEX makes Integrity Helpline reports available only to specific individuals within the company who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence.

The NAVEX system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named.

What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?

When you file an Integrity Helpline report using the NAVEX Web site or through the NAVEX Call Center, you receive a unique **report key** and are asked to **choose a password**. You can return to the Integrity Helpline either by Internet or Call Center and access the original report to provide additional details or answer questions posed by a company representative and add information that will help resolve open issues. You and the company now have started an anonymous dialogue, where situations are not only identified, but can also be resolved, no matter how complex.

If a reporter chooses to remain anonymous, they can also choose to provide an email address to receive updates when the company representative posts a question or comment to their case. To truly maintain the anonymity of reporters, this email address is not shared with the CITGO.

Are these follow-ups on reports as secure as the first one?

All Integrity Helpline correspondence entered in the NAVEX system are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity, if applicable.