

Policy 030-06	<h1 style="margin: 0;">Anti-Retaliation Policy</h1>		
Date of Issuance:	Supersedes Procedure No.	Originated by:	
03/12/2020	Original	Chief Compliance & Ethics Officer	
Date last reviewed by CEO direct report: 03/12/2020			

1.0 Purpose

- 1.1 It is the policy of CITGO Petroleum Corporation (the “Company” or “CITGO”) to conduct all business with honesty and accountability to preserve CITGO’s commitment to integrity and ethical business.
- 1.2 The purpose of this Policy is to promote and facilitate compliance with law, regulations, Company policies and procedures and to provide guidance on reporting any suspected illegal or unethical conduct.
- 1.3 It is the policy of the Company to provide a work environment free from retaliation for reporting suspected illegal or unethical conduct. CITGO will not tolerate acts of retaliation.

2.0 Scope

- 2.1 This Policy applies to CITGO and its Employees, and to subsidiaries and affiliates operated by Employees.
- 2.2 All Employees are responsible for understanding the requirements of this Policy and for obtaining assistance and guidance from the CITGO Compliance Department regarding questions or issues concerning this Policy or its applicability to their activities.

3.0 Definitions

- 3.1 **Employee.** The term “Employee” means any person, including contractors, directors and officers, who is (1) employed by CITGO to perform work for CITGO in exchange for compensation, and (2) subject to the supervision and control of CITGO.
- 3.2 **The CITGO Integrity Hotline.** A system available to all Employees and the general public that is designed for anyone to report conduct that is unlawful, unethical, or otherwise violates CITGO’s policies or procedures. The CITGO Integrity Hotline is hosted by outside firm, NAVEX Global via their EthicsPoint system.

4.0 Policy

4.1 Reporting

- 4.1.1 All Employees are required to promptly report any safety concerns or suspected illegal or unethical conduct, including any actual or potential violations of law, regulations, the Employee Code of Business Conduct and Ethics, or any Company policies and procedures, that have not already been reported to any of the channels listed in section 4.1.2.



4.1.2 You may report your concerns in multiple ways, including anonymously, to:

- Your Manager
- Human Resources
- Legal Affairs
- Compliance
- General Counsel
- General Auditor
- The CITGO Integrity Hotline (Anonymous)

4.1.3 The confidential CITGO Integrity Hotline may be accessed by filing an electronic report, or by calling (800) 252-4846. Complete Hotline instructions are available on the CITGO intranet. Concerns can be reported anonymously if desired.

4.1.4 Any comments or complaints received through the Hotline system or any other reporting channel will be investigated promptly and thoroughly. All employees are required to cooperate and participate truthfully in company investigations.

4.1.5 When reporting suspected illegal or unethical conduct, the Company will treat the report as confidential information. Details concerning the identity of the Employee who submitted the report and the alleged improper conduct will be disclosed only as necessary to comply with legal requirements and to investigate the reported conduct.

4.2 Anti-Retaliation

4.2.1 CITGO will not tolerate acts of retaliation. CITGO prohibits retaliation in any form against any Employee who speaks up to report suspected misconduct in good faith or who participates truthfully in an investigation. Acts of retaliation constitute misconduct, and may include dismissal, demotion, changes in work responsibilities, exclusion, threats, intimidation, or otherwise unwarranted discipline.

4.2.3 If you experience or witness conduct you believe to be retaliatory in nature, please contact Human Resources, Legal Affairs, the Compliance Department, or via the CITGO Integrity Hotline.

5.0 Related CITGO Policies and Procedures

- 5.1** Policy 30-00, Compliance with the Law
- 5.2** Policy 30-01, Anti-Fraud
- 5.3** Policy 30-02, Trade Compliance Policy (Sanctions, Import and Export Controls, Anti-Money Laundering and Anti-Boycott)
- 5.4** Policy 30-05, Employee Code of Business Conduct and Ethics
- 5.5** Policy 60-10, Harassment and Discrimination
- 5.6** Policy 100-00, Business Ethics and Conflict of Interest
- 5.7** Policy 100-01, Business Ethics and Conflict of Interest for Specified Officers
- 5.8** Procedure 30-05, Providing Gifts, Meals, Entertainment Or Travel to Government Officials



- 5.9** Procedure 70-01, Procurement
- 6.0** The CITGO Integrity Hotline