



# Code of Business Conduct & Ethics

## A MESSAGE FROM OUR CHIEF EXECUTIVE OFFICER

**The CITGO Code of Business Conduct & Ethics covers a range of business practices and applies to all employees, officers and contractors of the Company and its affiliates. It also sets forth CITGO expectations for business partners, suppliers and third-party representatives.**

For employees, officers and contractors, the Code is a resource designed to guide you in understanding the high standards of business ethics and personal conduct that CITGO expects, and to assist in maintaining fairness, ethics, honesty and legality in your personal and professional conduct. It discusses both your responsibilities and rights. The Code does not address every issue that could arise. Additional Company policies and guidelines are stated in full on the CITGO employee intranet. For business partners, suppliers and third-party representatives, the Code outlines the Company's expectations of you in conducting business with CITGO.

CITGO is dedicated to conducting business ethically, responsibly and fairly, and serving as a good steward of the communities in which it operates. It is your responsibility to report any known or suspected conduct that violates the Code or other Company policies. Your concerns will be promptly addressed, and the Company will not tolerate retaliation against anyone.

At CITGO, nothing is more important than upholding our Company values and always doing what is right. The Code is our guidebook for conducting ourselves and our business with ethics and integrity.

— Carlos Jorda, *CEO*

# Code of Business Conduct & Ethics

CITGO is committed to high standards of moral, legal, and ethical behavior. Our ***Code of Business Conduct and Ethics*** is an integral part of our business, and all employees, officers, contractors, business partners, suppliers and third party representatives are expected to read, understand, and strive to uphold the values and principles of the Code.

## **UPHOLDING OUR CORE VALUES: Responsibilities of all CITGO Employees, Officers, Contractors, Business Partners, Suppliers and Third Party Representatives**

Maintain a legal and ethical work environment.

Comply with the letter and spirit of all applicable laws, regulations, and CITGO policies as a minimum standard of conduct.

Act with integrity at all times and never be involved in fraudulent activities.

Share responsibility for the health, safety, security, and environmental performance of CITGO, and be accountable for your actions and for maintaining a safe and healthy work environment by following all relevant CITGO policies.

Comply with all applicable anti-corruption and anti-money laundering laws.

Comply with trade laws and restrictions that apply to CITGO operations and international trading activities, including sanctions, import and export controls, and anti-boycott laws.

Be fit for duty and in a condition to carry out your assignments and responsibilities on a daily basis. Accordingly, the use, possession, sale, purchase, or transport of unauthorized drugs or alcohol is strictly prohibited on Company premises, during working hours, or while transacting Company business.

Ensure that the CITGO workplace is free from harassment and discrimination. Discrimination on the basis of age, disability, national origin, race, religion, sex, genetic history, sexual orientation, or other legally protected status is strictly prohibited. Harassment in the CITGO workplace will not be tolerated.

Protect and maintain the confidentiality of any CITGO non-public business information, whether of the Company or of the Company's employees, officers, contractors, business partners, supplier and third party representatives. This confidentiality obligation continues even after employment or a business relationship ends.

Refrain from financial transactions or activities that are not in the best interests of CITGO. Employees may not profit from opportunities obtained by reason of employment with CITGO. All employees are required to read, understand, and abide by CITGO Policy [100-00 Business Ethics and Conflict of Interest](#), and to accurately and fully complete the related Questionnaire on an annual basis.

Employees are expected to devote their full time and abilities to CITGO interests during regular business hours and whatever additional time may be reasonably and properly required.

Employees must deal fairly with CITGO customers, suppliers, competitors, and employees at all times and may not take unfair advantage of anyone through any practice of unfair dealing.

Engage in fair competition and abide by all applicable antitrust and competition laws where CITGO does business.

Protect CITGO assets from loss, damage, misuse, or theft.

Protect CITGO interests by maintaining accurate and complete information and records which conform to applicable legal requirements and to the Company's system of internal controls, policies, and procedures.

Preserve the CITGO commitment to integrity and ethical business by reporting any suspected illegal or unethical conduct. To report a concern, you may contact the confidential Integrity Helpline by [filing an electronic report](#) or by calling (800) 252-4846. You may also report concerns by utilizing any of the various reporting channels described throughout this Code, including reporting directly to your supervisor, any Company Officer, or any member of the Ethics and Compliance, Legal Affairs, Human Resources, or Internal Audit Departments. It is CITGO policy that there is no retaliation for reporting such concerns.

These core values and expectations lie at the heart of the CITGO commitment to business integrity, lawful and ethical conduct, and treating people with respect. The material that follows is an introduction to several CITGO policies that put our Code of Business Conduct and Ethics into practice.

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## **CITGO Ethics and Compliance Committee**

The CITGO Ethics and Compliance Committee reports directly to the CEO of CITGO Petroleum Corporation, and is charged with assisting CITGO management in maintaining legal operations in accordance with applicable laws and Company policies and procedures.

The Committee reviews significant ethics and compliance issues, and works to prevent and detect any potential criminal actions or other conduct in violation of Company policies and procedures. The Committee is also charged with increasing employee and stakeholder awareness and understanding of ethics and compliance policies, as well as maintaining the integrity of mechanisms for employees to report unlawful or unethical conduct.

The Committee also reviews results of investigations related to unlawful or unethical conduct to both ensure discipline is consistently and fairly enforced, and any necessary changes are made to the Company’s internal policies and procedures to prevent reoccurrence.

## **PROMOTING A POSITIVE WORKING ENVIRONMENT: Responsibilities to Ourselves, Others and Our Surroundings**

### **Commitment to Diversity and Inclusion**

CITGO is committed to maintaining a diverse and inclusive workforce that reflects the diversity of the communities we serve. We believe that fostering a work environment in which our differences are embraced, valued, and respected is critical to our continued success and innovation. We are continuously evaluating our business model in step with our rapidly changing world, and remain committed to our core values of integrity, respect, and fairness in all we do.

### **Diverse, Skilled and Productive Workplace**

CITGO is committed to attracting, employing, and retaining a diverse, motivated and productive workforce to accomplish its business objectives and reach its financial goals. The Company expects that employees and contractors will perform the duties of their job to the required standards and to the best of their abilities.

### **Equal Employment Standards**

CITGO provides equal opportunity for employment, and in conditions of employment, to all persons without discrimination because of their race, color, national origin, gender, religion, age, disability, genetic history, or status as a veteran. CITGO has developed and maintains Affirmative Action Programs to assure equal opportunities for applicants and employees. These standards apply to all personnel actions.

### **Harassment-Free & Discrimination-Free Working Environment**

All CITGO employees, officers and contractors are responsible for ensuring that the CITGO workplace is free from harassment and discrimination. Sexual harassment, broadly defined and including any unwelcome conduct of a sexual nature, is a violation of CITGO Policy [60-10 Harassment and Discrimination](#). Any employee, officer, or manager who witnesses or receives a report of an alleged incident of harassment or act of discrimination must report it immediately to their supervisor, Human Resources, Legal Affairs, the Ethics and Compliance Department, or through the Integrity Helpline. The Company will promptly and thoroughly investigate the complaint, or direct a third party to do so. Employees are required to cooperate with these investigations. Each investigation will be kept confidential unless CITGO is required by law or regulation to disclose it.

### **Retaliation Will not be Tolerated**

It is the policy of CITGO to provide a work environment free from retaliation for good faith reporting of suspected illegal or unethical conduct. The Company will not tolerate acts of retaliation.

If you experience or witness conduct you believe to be retaliatory in nature, contact Human Resources, Legal Affairs or the Ethics and Compliance Department immediately. You can also report suspected retaliatory behavior to the CITGO Integrity

Helpline by [filing an electronic report](#) or by calling (800) 252-4846. Any CITGO employee who violates any portion of CITGO Policy [30-06 Anti-Retaliation](#) will be subject to immediate discipline, up to and including termination of employment.

### **Health, Safety, Security, and Environmental Management**

CITGO is committed to protecting the environment, public health, and the safety of its employees, contractors, and the public. The Company always wants to be seen as a responsible steward of public health and the environment by the communities where we operate and the regulatory agencies with which we deal. To achieve this goal, CITGO has adopted a [Statement of Health, Safety, Security, and Environmental Protection](#).

CITGO recognizes that it is responsible and accountable for the management of health, safety, security, and environmental compliance across its operations. The Company is committed to compliance with all applicable laws, regulations, and judicial and administrative orders regarding health, safety, security, and environmental management. We believe that all our employees and contractors are responsible for taking all measures necessary to prevent health, safety and environmental incidents and injuries, and protect our customers and communities.

We will continually be vigilant to identify security threats to our people and assets. We commit ourselves to focus daily on the fulfillment of these responsibilities, and to make continuous improvements in effectively applying our resources, management systems and technology. In addition, the Company strives for continuous improvement in health, safety, security and environmental areas by adopting multi-year improvement goals and stewarding progress towards achieving those goals and to promptly address any issues that arise.

The Company's commitment to health, safety, security and environmental protection includes a commitment by all employees to promptly report any potential violations or concerns. Any CITGO employee, officer, or manager who witnesses or receives a report of an alleged violation, unsafe working condition, or safety concern must report it immediately to his or her supervisor, a Company officer, HSE, Ethics and Compliance, Legal Affairs, or Internal Audit Departments, or through the Integrity Helpline. Employees who violate these requirements will be subject to immediate discipline, up to and including termination of employment.

### **ADHERING TO HIGH LEGAL STANDARDS: Responsibilities to Governments & the Law**

CITGO and its stakeholders have a duty to comply fully with the letter and spirit of the law. The Company's management is responsible for ensuring that all personnel they supervise comply with all applicable laws, the Code and all other Company policies.

## **Anti-Fraud Standard**

All stakeholders must act with honesty and integrity at all times, and refuse to engage in fraud, embezzlement, forgery or unauthorized alterations of Company documents, misuse or personal use of Company resources, fraudulent financial reporting, or any other type of fraudulent acts. CITGO will fairly and thoroughly investigate any reported alleged fraudulent activities, whether they involve CITGO employees or outside parties having a relationship with CITGO.

The Company's management is responsible for ensuring that adequate controls exist to prevent fraud. CITGO employees, in the course of their daily work, are often in the best position to recognize specific risks of fraud. Employees suspecting fraudulent activity are required to promptly report it to his or her supervisor, the CITGO Chief Ethics and Compliance Officer, the Ethics and Compliance Department, Internal Audit, the General Counsel or any Company attorney, or through the CITGO Integrity Helpline. To the degree possible under applicable law, the identity of the person reporting the matter will be kept confidential and will always be protected from retaliation. CITGO will seek to recover assets lost as a result of fraud or dishonesty.

## **International Trade Laws**

CITGO complies with all laws and regulations regarding sanctions, import and export controls, money laundering, and anti-boycott laws in the countries in which it operates, including laws administered by the U.S. Departments of Commerce, State, and Treasury. This requirement applies to all transactions conducted either directly or indirectly by or for CITGO, and to any services provided by CITGO to its parent or affiliates. CITGO will not enter into transactions with any person or company that is not in full compliance with these laws and regulations. CITGO also screens all customers, vendors, and third-party representatives against applicable government lists that pertain to these laws. The Company's Customs Compliance Department is responsible for assuring the correct classification of CITGO exports and re-exports and for the related government filings.

Violators of international trade laws may also be subject to criminal penalties. Employees who violate international trade laws will be subject to disciplinary action up to and including termination of employment. If any CITGO stakeholder suspects a violation of international trade laws, they should report such suspected violations to the CITGO Chief Ethics and Compliance Officer, the Ethics and Compliance Department, Internal Audit, the General Counsel or any Company attorney, or through the CITGO Integrity Helpline. All stakeholders reporting suspected violations will be fully protected from retaliation. The Legal Affairs and Ethics and Compliance Departments are always available to answer any questions or address any issues or concerns.

## **Customs and Border Protection Laws and Regulations**

CITGO and all involved stakeholders must comply fully with all U.S. Customs and Border Protection laws and regulations. Any transaction involving a Specially Designated National, or person, entity, or country otherwise sanctioned by the United

States, or person on the Denied Parties List, is prohibited unless prior authorization in the form of a license from the United States Treasury Department or some other form of written authorization has been received by the Company from appropriate authorities expressly permitting the transaction. If any CITGO stakeholder suspects a violation of U.S. Customs and Border Protection laws or regulations, they should report such suspected violations to the CITGO Chief Ethics and Compliance Officer, the Ethics and Compliance Department, Internal Audit, the General Counsel or any Company attorney, or through the CITGO Integrity Helpline.

### **Anti-Corruption Laws**

CITGO complies with all applicable anti-corruption laws in the countries in which the Company does business, including but not limited to the United States Foreign Corrupt Practices Act (FCPA). All CITGO employees, contractors, business partners, suppliers and third-party representatives are expected to comply with all applicable anti-corruption laws and Company policies. Individuals who violate the FCPA or other anti-corruption laws may be subject to severe fines and imprisonment. Employees who violate anti-corruption laws or CITGO Policy [30-04 Anti-Corruption](#) will be subject to disciplinary action up to and including termination of employment. The Legal Affairs and Ethics and Compliance Departments are always available to answer any questions or address any issues concerning anti-corruption laws or any related Company policy.

CITGO prohibits all bribes, kickbacks, or corrupt payments of any kind, to officials at any level of government, and to private sector persons with whom CITGO does business. The FCPA and other anti-corruption statutes take a broad stance on what constitutes a corrupt payment. The FCPA prohibits an individual from providing “anything of value” to a government official with the intention of influencing the government official’s actions, or obtaining an improper advantage. Depending on the circumstances, a “thing of value” may include cash, gift certificates, gifts or free goods, meals, entertainment, hospitality, reimbursement of travel expenses, the provision of services, and intangible benefits that result in an enhanced social or business standing.

Under no circumstances may any CITGO employee, contractor, business partner, supplier or third-party representative, on behalf of CITGO, promise or make a gift of a “thing of value” directly or indirectly to a government official, or any other person, with the intent to improperly influence any act or decision of such a person, to induce such a person to violate his or her duties, and/or to secure an unfair or improper advantage.

If any government official or other person asks or attempts to extort any money or thing of value from any CITGO stakeholder, the request must be refused and the event immediately reported to the CITGO Chief Ethics and Compliance Officer, the Ethics and Compliance Department, Internal Audit, the General Counsel or any Company attorney, or through the CITGO Integrity Helpline. Anyone reporting in good faith suspected corrupt activities will be protected from retaliation in accordance with the CITGO Anti-Retaliation Policy. Similarly, CITGO employees, contractors, business partners, suppliers and third-



party representatives may not solicit or attempt to solicit a bribe, kickback, or improper benefit.

Additionally, CITGO employees, contractors, business partners, suppliers and third-party representatives are prohibited from making “facilitating payments” to government officials to expedite any official act, unless they have been pre-approved by the CITGO Government and Public Affairs and Ethics and Compliance Departments. Transactions in which CITGO does business with entities owned in whole or in part by a government require special care, and all activity must be conducted in accordance with CITGO Policy [30-04 Anti-Corruption](#) and Procedure [30-05 Providing Gifts, Meals and Entertainment, or Travel to Government Officials](#).

CITGO charitable contributions outside the United States must only be made for legitimate business purposes, with approval from the Legal Affairs and Ethics and Compliance Departments. Charitable contributions may never be made with the intent to improperly influence any act or decision of a government official or to secure an improper advantage.

CITGO does not contribute anything of value to a candidate for a foreign political office, a foreign political campaign, a foreign political party, or organizations affiliated with foreign political candidates. Employees may make lawful contributions, in their personal capacity, to a candidate for a foreign political office, a foreign political campaign, a foreign political party, or organizations affiliated with foreign political candidates.

All stakeholders of CITGO must keep books, records, and accounts accurately and fairly. False, misleading, incomplete, or vague entries are strictly prohibited. Similarly, stakeholders may not establish secret funds or assets of CITGO; make false entries into CITGO books; use CITGO funds or assets for any unlawful, improper, or unethical purpose; falsify expense reports; fail to record transactions; make misrepresentations to internal or external auditors; or fail to obtain necessary approvals for payments on behalf of CITGO.

FCPA and anti-corruption training will be conducted annually for each employee. Some employees may receive more specialized, in-person training based on the nature of the transactions that they are involved in.

Any stakeholder who has information or knowledge about conduct inconsistent with the CITGO Anti-Corruption Policy should promptly report that information to the CITGO Chief Ethics and Compliance Officer, the Ethics and Compliance Department, Internal Audit, the General Counsel or any Company attorney, or through the CITGO Integrity Helpline. The reports received will be given confidential treatment. It is CITGO [Policy](#) that there will be no retaliation for reporting potential compliance concerns.

### **Foreign Agents Registration & Lobbying Disclosure Acts**

CITGO complies with the U.S. Foreign Agents Registration Act (FARA), which requires

that anyone representing the interests of foreign principals in the United States before U.S. government officials, must disclose the relationship publicly. Activities which might require registration must be reviewed in advance by the CITGO Legal Affairs Department.

Violations of FARA are crimes and cause serious damage to the reputation of CITGO. Violators are subject to disciplinary action including termination of employment.

CITGO also complies with the Lobbying Disclosure Act, which requires federal lobbyists to register with the Clerk of the U.S. House of Representatives and/or the Secretary of the U.S. Senate.

## **OBSERVING HIGH ETHICAL STANDARDS: Responsibilities to the Company**

### **Business Ethics and Conflicts of Interest**

All CITGO employees have a position of trust with, and a primary business responsibility to always act in the best interests of the Company at all times. They must comply with all applicable laws and regulations, adhere to high moral and ethical standards, and refrain from being involved in outside business or financial activities or interests that may interfere with the proper performance of their employment or harm the best interests of CITGO. Employees may not profit or receive personal gain from information or business opportunities acquired while employed at the Company, and should refrain from all transactions that are against the best interests of the Company or would damage its reputation.

This applies to all CITGO employees, and to direct and indirect interests held by members of an employee's immediate family or certain persons who may act on behalf of an employee, as defined in the Company's Policy [100-00 Business Ethics and Conflict of Interest](#).

Employees must complete a Business Ethics and Conflict of Interest Questionnaire every year. Every employee has a continuing responsibility to disclose, immediately and in writing, to the General Auditor and/or General Counsel, any transaction or financial interest that might be a conflict of interest under this policy. CITGO encourages employees to discuss cases that might be a conflict of interest before making any financial commitments. Any employee who knows or has a good faith reasonable belief that a violation of the Company's Conflict of Interest Policy or other illegal or unethical conduct has occurred shall immediately report the relevant facts to the General Auditor. No employee shall be subject to reprisal for making a report, unless the report is knowingly false.

Employees must not have any material financial interests in, or engage in any material business venture or transaction with, any customer or competitor of CITGO. The

Company may require prompt resolution of the improper conduct or financial interest; it may also, in certain cases, take action up to and including termination of the employee where a material violation has not been remedied. Employees are expected to give their full time and ability to the Company's business during regular business hours and whatever other time may be reasonably and properly required by the Company.

Employees, officers, contractors, business partners, suppliers and third-party representatives are responsible for protecting all confidential information of CITGO. The confidential information cannot be used for financial gain, including the trading of securities or disclosing the information outside CITGO or to persons within CITGO who do not have a business reason to know the information. Similarly, no employee may attempt through improper means to acquire a competitor's trade secrets or confidential information.

Employees may not accept gifts, entertainment or other items of value greater than \$100 from actual or potential suppliers, contractors, or customers without prior written approval. Employees must report any prohibited gifts and return them to the provider with a letter explaining that accepting the gift is against CITGO Policy. Acceptance of meals is limited to good business judgment. Employees may not solicit meals or trips. Employees shall not accept trips from actual or potential suppliers, contractors, competitors, or customers without the prior written approval of the executive officer or Vice President to which the employee's business unit reports.

Employees are encouraged to seek guidance on any conflicts of interest issues from the Ethics and Compliance Department, Legal Affairs, or the Internal Audit Department. Certain specified officers of CITGO are subject to additional rules on business ethics and conflicts of interest beyond the policies applicable to other employees, based on their positions of trust with CITGO.

### **Information Security Standards**

CITGO information security policies are designed to protect the confidentiality, integrity, and availability of business information. Information is an asset of the Company, and employees, contractors, relevant suppliers and third-party representatives are responsible for safeguarding and maintaining information in a way that protects the Company and complies with all applicable laws, regulations, and Company policies and procedures. Information that is restricted to internal use within CITGO is not available to the public, and only those CITGO employees with a business reason to know confidential information should have access to it.

It is CITGO policy that no individual may engage in unauthorized or surreptitious recording of conversations of other employees, vendors, customers, consultants, or others connected with CITGO meetings or other events. All parties to a recording must consent or be given notice at the outset that the meeting or event will be recorded, transcribed, or taped in accordance with CITGO Policy [165-00 Information Security](#).

### **Information Technology Standards**

CITGO information technology resources, including mobile devices, exist to serve CITGO business purposes and should be used only for CITGO business purposes. Incidental personal use should not result in cost or liability to CITGO or interfere with job responsibilities. Users of CITGO information technology services, including computers, do not have any personal privacy rights with regard to use of those resources. All Employees are expected to read, understand, and abide by CITGO Policy [181-00 Information Technology](#).

### **Records Management Practices**

All CITGO employees are responsible for understanding CITGO Policy [20-12 Records Management](#) and Procedure [20-12 Records & Information Management](#) , and must retain records in compliance with applicable laws and regulations and adhere to the Company's Records Retention Schedule.

All contractors, business partners, suppliers and third-party representatives must retain records in compliance with applicable laws and regulations.

### **Business Expenses & Business Travel Standards**

CITGO employees must avoid unnecessary costs for business-related travel. Employees must make all airline, hotel, and car reservations, and produce accurate and timely expense reports, in accordance with the requirements of CITGO Policy [20-07 Employee Business Expense and Travel](#).

## **DEVELOPING STRONG PARTNERSHIPS: Responsibility and Integrity in Procurement**

CITGO procurement efforts are governed by high standards of integrity. To that end, CITGO has adopted a series of policies and procedures designed to ensure that procurement and corporate spending is always done in the Company's best interest.

### **Basic Standards of Procurement**

CITGO has three basic objectives in the procurement of goods and services: risk management (reducing the risk to CITGO, including through the negotiation of favorable contract terms); speed control (optimizing the pace of purchases to best achieve CITGO purposes); and value creation (cost savings for CITGO). In order to fulfill these objectives, all Employees are required to read, understand, and abide by CITGO Procedure [70-01 Procurement](#) and Policy [70-10 Procurement Committee Charter](#).

CITGO will identify small businesses, minority and women-owned businesses as part of its vendor management program. Buyers are encouraged to include small businesses and minority and women-owned businesses in bid lists whenever possible.

### **Compliance Screening of all Existing and Potential Counterparties**

The Company seeks to work with counterparties who share its commitment to conducting business safely, ethically, and in compliance with all applicable laws and regulations. All CITGO employees are expected to comply with the Company's policies, procedures, and corporate standards when selecting and conducting business with counterparties. Business units requesting a new counterparty must first conduct initial due diligence and obtain all necessary approvals in accordance with CITGO Procedure [30-06 Vendor and Customer Compliance](#).

### **Records and Auditing**

Records. All suppliers and third-party representatives shall maintain complete and accurate records of all books and accounts, together with supporting or underlying documents and materials pertaining to the performance of work, claims, cost estimates and bid proposals, change orders or price adjustments.

Subcontractor Records. All suppliers and third-party representatives shall require all of their subcontractors, submitting a reimbursable charge or cost, to make their records available upon request. Such records will also include subcontractor's proposals, bids and estimates for both the successful and non-successful bidders.

Access. CITGO shall have the right to inspect, audit and reproduce records in order to verify Supplier's right to payment and compliance with relevant contractual obligations.

### **Procurement Committee**

CITGO maintains a Procurement Committee (CPC) to assist the Company in the oversight of key procurement decisions and ensuring that procurement is done in the Company's overall best interests, including finance and operations considerations.

The CPC is an independent body composed of CITGO employees with professional competency, known for their high ethical standards, and sufficient rank within their business units.

### **The CITGO Integrity Helpline is Always Available**

Conducting business with ethics and integrity is essential to the Company's long-term success. All CITGO stakeholders have a responsibility to speak up and promptly report any safety or environmental concerns and any suspected illegal, unethical, wrongful conduct, including any actual or potential violations of law, regulations, or the Code.

There are several reporting channels available for stakeholders to ask questions or raise concerns, including the CITGO Integrity Helpline. The external, confidential CITGO Integrity Helpline is available 24 hours a day, 7 days a week and may be accessed by [filing an electronic report](#) or by calling (800) 252-4846.

All CITGO stakeholders should be assured that when they speak up, the Company will listen and follow up. Any comments or complaints received through the Helpline system, or any other reporting channel, will be investigated promptly and thoroughly. Concerns can be reported anonymously if desired.

Other available avenues to raise concerns include reporting directly to your supervisor, any Company Officer, or any member of the Ethics and Compliance , Legal Affairs, Human Resources, or Internal Audit Departments. Any person who reports a concern will be protected from retaliation in accordance with CITGO Policy [30-06 Anti-Retaliation](#). This includes concerns reported through the Integrity Helpline or any other available reporting channel.