

At CITGO, we are committed to our Values of Safety, Integrity, Respect, Accountability, and Care. Our CITGO Code of Conduct expresses how we expect to conduct our business. Our Code also acknowledges the significant role that third parties play in our business operations. At CITGO, “how we do it” is just as important as “what we do.” We want to work with those who share our Ethical Standards, Values, and our Commitment to Safety.

It is important that we communicate our expectations to you and ask that you embrace these expectations and share them with your employees, suppliers, and any other third parties who engage in work for CITGO.

This document outlines part of the fundamental expectations required of third parties who provide products and/or services to CITGO. It does not serve as a replacement or substitute for the Code itself or relevant laws, nor does it alter any contractual obligations.

## OUR EXPECTATIONS

### General Expectations

We, at CITGO, expect that all our third-party representatives will:

- Comply with all laws, regulations, and contractual requirements.
- Adhere to applicable industry standards for the products and/or services supplied to CITGO.
- Embrace CITGO Values while providing products and/or services to or on behalf of CITGO.
- Cultivate and nurture a strong safety culture, including ensuring transparent, accurate and timely reporting of incidents and issues.
- Promote and encourage a speak-up, listen-up and follow-up culture that does not tolerate any form of retaliation.
- Conduct business in a manner that encourages the prevention of incidents which may cause loss of life, injury, or illness to people, or have a negative impact on the environment, assets, or our reputation.

### Safety

As a third-party representative, it is essential to encourage your employees, suppliers, and any other third parties you engage for the provision of products and/or services to promptly report any accidents, injuries, illnesses, or hazardous conditions.

Additionally, your employees, suppliers and third parties you engage should cease any work that may pose a risk, so that appropriate action can be taken.

### Business Conduct

We expect all third-party representatives to establish robust processes and procedures, encompassing training, due diligence, and financial controls, which reinforce expectations to:

- Exchange only appropriate **gifts, entertainment, and hospitality**.
- Identify and disclose actual, perceived, or potential **conflicts of interest** to CITGO, including not using CITGO information and resources for improper gains.
- Never engage in **bribery and corruption** by offering or making bribes or improper payments to improperly influence a business decision.
- Never engage in **anti-competitive conduct**, including any form of discussion, agreement or understanding with competitors to fix prices, rig bids, allocate customers or restrict supply.
- Be vigilant of signs of **money laundering** (e.g., accepting payments that appear connected to illegal activities).
- Appropriately follow international laws and regulations regarding **sanctions**, import and export controls, and anti-boycott laws.

## Data Privacy and Cybersecurity

We expect all third-party representatives to implement procedures and controls to ensure the security of the CITGO network, personal and company information and data, and intellectual property. We expect all personal information to be handled with utmost care and in compliance with all relevant data protection laws. Third party representatives are expected to comply with all applicable cybersecurity laws, regulations, and industry standards. We expect the following:

- Maintain an active cybersecurity risk management process.
- Understand the types of personal data collected, the purposes for which it is used, and how it is stored and protected.
- Only collect the necessary personal information required for business transactions and interactions, avoiding excessive data collection.
- Promptly report any actual or suspected data breaches, security incidents or unauthorized access to systems or data that may impact our company or its customers.

## Speak-up, Listen-up and Follow-up

Speak-up, listen-up and follow-up are essential elements of CITGO culture. We expect third-party representatives to foster a speak-up culture that ensures everyone feels respected, valued, and empowered to share their thoughts and to ask questions. We also expect third-party representatives to listen and then follow up on any concerns raised to you regarding CITGO business. CITGO provides many channels for our third-party representatives to report instances where you believe conduct has been unlawful, unethical, or inconsistent with CITGO Values. Those channels include your CITGO business representative, a senior leader of CITGO, the CITGO Ethics & Compliance Office, CITGO

Legal Affairs, or CITGO Corporate Audit Services. In addition, third-party representatives may also report concerns or ask questions to the CITGO Integrity Helpline, which is purposely managed by a third-party service provider. Reports can be filed via the [CITGO Integrity Helpline](#), either online at the link provided, or by phone at 1-800-252-4846.

## Mutual Respect

In our business relationships, we treat one another with respect. CITGO expects our third-party representatives to foster a respectable work environment by prohibiting:

- Any physical or verbal acts that create an offensive, hostile, or intimidating work environment for others.
- Discrimination based on personal traits or characteristics including an individual's race, color, religion, gender, sex (including pregnancy, sexual orientation, or gender identity), national origin, age, disability, or genetic information (including family medical history).
- Any actions that would be considered retaliatory.

*Thank you to adhering to these expectations when providing products and/or services to CITGO.*

