



---

## HARASSMENT AND APPROPRIATE WORKPLACE CONDUCT

### GENERAL PURPOSE

To affirm the commitment of Marathon Petroleum Corporation (“MPC”) and its consolidated subsidiaries (the “MPC Group”) to provide a work environment free from all forms of harassment and to provide procedures by which allegations of harassment may be reported, investigated and resolved.

### POLICY STATEMENT

1. **Objective:** To promote harmonious work relationships and maintain a professional work environment where all people are treated with dignity, decency and respect, MPC and its affiliates prohibit harassment in any form. Through enforcement of this Policy and by education of employees, the company seeks to prevent, correct and discipline all behavior that violates this Policy. All employees, regardless of position, are covered by and required to comply with this Policy. Every employee shares responsibility for keeping the company free from harassment. The prohibition against harassment extends to work-related situations involving interaction between or among employees, vendors, contractors, and customers, which occur on or off company property or during or after regular work hours, including off-site meetings, business travel, and social events.

2. **Prohibited Conduct:** All forms of harassment that create an intimidating, hostile or offensive work environment are forbidden, including, but not limited to, harassment based upon a person’s race, color, religion, creed, sex, gender (including pregnancy, childbirth, breastfeeding or related medical conditions), sexual orientation, gender identity, gender expression, age, physical or mental disability, medical condition or AIDS/HIV status, national origin, ancestry, genetic information, marital status, military, veteran status, citizenship, or any other status protected by applicable federal, state or local laws.

Prohibited harassment (whether verbal, physical, visual, or transmitted via electronic communication) includes insulting, intimidating or discourteous conduct, derogatory jokes or comments, epithets, slurs, intimidation and negative stereotyping based on or related to a protected status; and display or distribution of material or images that taunt, ridicule, denigrate, insult, belittle, or show hostility toward an individual or group because of a protected status. The company may consider conduct to be harassment in violation of this Policy even if not considered unlawful under applicable law.

3. **Sexual Harassment:** Harassment that is specifically based on sex can take two forms: hostile work environment or quid pro quo. Sexual harassment can happen regardless of a person’s gender and can occur between members of the same sex.

a. **Hostile Work Environment Harassment:** Conduct that has the purpose or effect of interfering with an individual’s work performance or creating an intimidating, hostile, or offensive work environment; or



- b. **Quid Pro Quo Harassment:** Unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature when submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, or when submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, whether of the same or opposite gender.

Examples of behaviors that could constitute sexual harassment in violation of this Policy include, but are not limited to, invitations to engage in sexual conduct, physical touching, sexual innuendo, suggestive comments, threats, or display of sexual images or sexually suggestive objects. The conduct need not be motivated by sexual desire to be sexually harassing.

4. **Reporting an Incident of Harassment or Retaliation:** If any individual believes that he or she, or another employee, has been subjected to any form of harassment or retaliation, the employee observing or experiencing the alleged harassment or retaliation must immediately report the incident to one of the following:
- His or her supervisor or manager;
  - Another supervisor or manager;
  - Human Resources;
  - Business Integrity and Compliance;
  - The Integrity Helpline (855-857-5700, [www.MPCIntegrity.com](http://www.MPCIntegrity.com) or [www.MPLXIntegrity.com](http://www.MPLXIntegrity.com)) (Reporters may choose to remain anonymous); or
  - Any of the other avenues for reporting harassment, retaliation, and discrimination established by the company.

Reports of potential or actual violations of this Policy may be verbal or written and are not required to be in any particular form. Managers or supervisors who receive complaints or who are otherwise aware of conduct that may be in violation of this Policy must immediately report all such complaints and conduct to Human Resources or Business Integrity and Compliance.

Employees are not required to report any prohibited conduct to a supervisor who may be hostile, who has engaged in such conduct, who is a close associate of the person who has engaged in such conduct, or with whom the employee is uncomfortable discussing such matters. If the alleged harasser is a supervisor, Human Resources, Business Integrity and Compliance, or Integrity Helpline must be immediately notified. The harassed individual may, but is not required to, complain to the alleged harasser that the conduct is unwelcome and must stop.

5. **Investigation Process:** The company's process for handling complaints of violations of its policies prohibiting unlawful harassment, discrimination and retaliation is to ensure that complaints are: a) treated confidentially, to the extent practicable and in accordance with applicable law; b) responded to in a timely fashion; c) investigated fairly, promptly and thoroughly by impartial and qualified personnel in a manner that provides all parties appropriate due process and reaches reasonable conclusions based upon the evidence gathered; d) documented and tracked to ensure reasonable progress; e) met with appropriate remedial action where misconduct is found; and f) afforded a timely closure. Employees are expected to cooperate, be forthcoming and be truthful if they are asked to provide information in relation to a company investigation.



6. **No Retaliation.** The company strictly prohibits retaliation or threats of retaliation against those who report a violation of this Policy, oppose harassment pursuant to the Policy, or participate in an investigation of alleged violations of this Policy. Participating in an investigation of alleged violations of this Policy may include the following: making or filing an internal complaint with the company about alleged unlawful harassment; providing informal notice to the company regarding alleged unlawful harassment; filing a complaint with a federal, state or administrative agency; participating in or cooperating with a federal, state or administrative agency that is conducting an investigation of the company; testifying as a party, witness or accused regarding alleged unlawful harassment or associating with another employee who is engaged in any of these activities. If an employee believes that he or she is being retaliated against or observes retaliation by another employee, supervisor, manager or non-employee, he or she should immediately report the incident as specified in this Policy.
7. **Discipline:** Employees who violate this Policy will be subject to appropriate disciplinary action, up to and including termination. Moreover, any employee, supervisor or manager who condones, ignores, or fails to appropriately escalate violations of this Policy will be subject to appropriate disciplinary action, up to and including termination. Other individuals who violate this policy may be immediately removed from the premises.

## **POLICY APPLICATION**

This Policy applies to MPC and those entities within the MPC Group that have adopted it. Further, the substance of this Policy, appropriately adapted for the conditions involved, is recommended for adoption by MPC affiliate-operated joint venture entities.

## **POLICY ADMINISTRATION**

The administration of this Policy is the responsibility of the MPC Chief Human Resources Officer.

## **POLICY REVIEW**

This Policy shall be reviewed at least once every five years, or more frequently as stipulated by the approver, or when a significant change occurs, including any change in law, that impacts the content or substance of this Policy.

## **POLICY EXCEPTIONS**

None

## **REFERENCES**

[Policy #2001, Code of Business Conduct](#)  
[Policy #2007, Anti-Retaliation for Reporting Illegal or Unethical Conduct](#)  
[Policy #10001, Equal Employment Opportunity](#)  
[Acknowledgment and Receipt MPC's EEO and Harassment Policies for California Employees](#)



**REVISION HISTORY**

Revision Number	Description of Change	Reviewed By	Review Date	Approved By	Approval Date	Effective Date	Next Review Date
0	Original Policy	MPC Management Executive Committee				06/30/2011	06/30/2016
1	To add ‘gender identity’ to the list of protected statuses	MPC Management Executive Committee	06/30/2016	MPC Management Executive Committee	06/30/2016	06/30/2016	06/30/2021
2	Administrative	MPC Vice President, Corporate Secretary and Chief Compliance Officer	11/01/2016	MPC Vice President, Corporate Secretary and Chief Compliance Officer	11/01/2016	11/01/2016	06/30/2021
3	Administrative revisions associated with MarkWest integration	MPC Vice President, Corporate Secretary and Chief Compliance Officer	12/19/2016	MPC Vice President, Corporate Secretary and Chief Compliance Officer	12/19/2016	01/01/2017	06/30/2021
4	To provide clarification that the policy applies to work related events occurring offsite, provide additional detail on actions that could constitute sexual harassment, clarify possible discipline, and include an anti-retaliation provision	MPC Chairman and Chief Executive Officer	03/16/2018	MPC Chairman and Chief Executive Officer	03/16/2018	03/16/2018	03/16/2023
5	Administrative revisions associated with Andeavor integration	MPC Chairman and Chief Executive Officer	11/20/2018	MPC Chairman and Chief Executive Officer	11/20/2018	10/1/2018	03/16/2023
6	Substantive revisions associated with state law and federal contractor status	MPC Management Executive Committee	04/01/2019	MPC Management Executive Committee	04/01/2019	04/01/2019	04/01/2024