PROVIDING ENERGY. IMPROVING LIVES.

Code of Business Ethics and Conduct

Albuquerque International Balloon Fiesta ALBUQUERQUE, NM

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Our Company Values

The Phillips 66 values of safety, honor and commitment and our Code of Conduct help guide all of our business decisions and reflect our company's commitment to these values.

Lake Charles Manufacturing Complex WESTLAKE, LA

SAFETY.

We protect each other, our environment and our communities.

Habitat for Humanity volunteer event HOUSTON, TX

HONOR.

We stand behind our word, and you can count on us to do the right thing, always.

Wood River Refinery ROXANA, IL

COMMITMENT.

We are inspired to achieve the highest levels of performance in everything we do.

Putting our values into practice creates lasting benefits for all our fellow employees, customers, suppliers, other business partners and shareholders, as well as the communities where we live and work.

Message From Our President and CEO

Phillips 66 Team,

At Phillips 66, we take great pride in providing energy and improving lives, and we never compromise our integrity in the process. We strive to ensure that every decision we make is ethical and reflects our core values of safety, honor and commitment.

Our Code of Conduct describes the basic guidelines for how we operate and ties our company's values to the way we make decisions. Our values, however, are not only about the words written in the pages of our Code of Conduct. We demonstrate our values in the ways we live out these words in every task we do, every day.

It is inevitable that we all will face situations that challenge us. The Code of Conduct provides guidance when faced with those challenges. It is our responsibility to uphold our Code of Conduct — to set a high standard for ourselves and be seen by our peers, customers, business partners, investors and communities as a company that does the right thing, always.

I encourage you to speak up if you are ever in a situation where you feel our values are at risk. Doing so solves problems and mitigates risk. We do not tolerate retaliation in any form for reporting, in good faith, suspected violations of our Code of Conduct. It is about taking care of ourselves, each other and our company.

I am proud of our focus on maintaining the highest level of integrity in everything we do. As a leading energy company, ethical performance across our business is more critical than ever. Our sustained success and strong reputation require each of us to take personal responsibility for living the Code of Conduct. Together, we can continue to grow as a company and be proud to come to work every day.

Yours,

Mark Lashier
President and CEO

Getting to Know
Our Code of Conduct

Introduction

We are committed to upholding the highest ethical standards in all of our operations, wherever those are located. In doing so, we reinforce a culture of trust with our stakeholders. All officers, directors and employees are expected to conduct all Phillips 66 business with honesty and candor. Our core values of safety, honor and commitment and our Code of Business Ethics and Conduct provide a principled foundation for our reputation as a company that operates with integrity.

Upholding and living our Code of Conduct is critical to protecting the Phillips 66 business because our reputation is built upon an unwavering commitment to ethical behavior. As the foundation of our Global Compliance and Ethics Program, the Code of Conduct establishes high standards of ethical and legal behavior. It also incorporates many of our Company's policies and procedures, as well as many of the laws and regulations we must follow. Violations of our Code of Conduct may result in harm to the business, as well as disciplinary action, up to and including termination.

Our Code of Conduct applies to all of our officers, directors, and employees and all majority-owned and -controlled subsidiaries, as well as each of their officers, directors and employees. We observe the separate legal status and independence of subsidiary companies. To make the Code of Conduct easier to read, we use "Company" to refer to each one of these entities and "we" and "our" to refer to the respective officers, directors and employees who make the Company a leader in ethical stewardship.

Find our Company policies and related information on the Phillips 66 Supplemental Information site. (phillips66.com/sustainability/supplemental)

Chevron Phillips Chemical Company LLC (CPChem) SWEENY, TX

Our Commitment to Our Stakeholders

We are committed to the highest ethical standards. We want people to know they can count on us. This commitment flows naturally from our responsibilities to our shareholders, our customers, our families, our vendors, the communities where we live and work, and each other.

All of us should be familiar with our Code of Conduct and comply with it in our daily work.

In addition, we expect our suppliers, contractors and others who do business on our behalf to conduct Company-related business activities in compliance with the standards detailed in our Business Partner Principles of Conduct, as well as with all applicable laws and regulations.

Responsibilities of Employees

We are all responsible for reading, understanding and upholding the letter and the spirit of our Code of Conduct, policies and procedures, and applicable laws and regulations. But we cannot stop there. We must also conduct Company business in accordance with our core values of safety, honor and commitment. As a condition of employment (and subject to applicable law), every employee's personal responsibilities include:

- Complying with all applicable laws and regulations and Company policies
- Exhibiting appropriate ethical behavior and conducting Phillips 66 business in compliance with our core values of safety, honor and commitment and in accordance with this Code of Conduct
- Reporting any suspected misconduct, illegal activity, fraud, abuse of Company assets or other violations of ethical standards
- Cooperating fully in the Company's investigation of a report

Always exercise good judgment. If you are ever unsure of the proper business conduct, contact any of the resources listed in the "Seeking Advice and Reporting Concerns" section.

Gray Oak Pipeline WINK, TX

Responsibilities of Managers and Supervisors

As active leaders within our Company, managers and supervisors are expected to model ethical business conduct at all times and to communicate to employees the behaviors expected of them. Managers and supervisors have a responsibility to promote and ensure compliance with our Code of Conduct, policies and procedures, and applicable laws and regulations. Each manager and supervisor is responsible for promoting a positive work environment where employees feel comfortable asking questions and reporting concerns.

Managers and supervisors should be open and available to these conversations and prepared to respond to any issues that are raised. If you are unable to resolve an issue, refer the matter to the appropriate resource. If an ethical violation is raised, you should ensure that either you or the employee reports the violation to the Global Compliance and Ethics office. See the “Seeking Advice and Reporting Concerns” section.

Waiver

The Phillips 66 Board of Directors (the “Board”) has approved and supports this Code of Conduct. Any waiver of the provisions of this Code of Conduct for directors or executive officers may be made only by the Board or an authorized committee of the Board and will promptly be disclosed as required by any applicable laws, rules and regulations.

Non-retaliation

The Company strictly prohibits retaliation against any individual who makes a good faith report of alleged wrongdoing or who participates in an investigation. Suspected retaliation should be reported immediately to the Global Compliance and Ethics office.

Any form of retaliation and any employee who retaliates against someone who makes a report in good faith may be subject to disciplinary action, up to and including termination.

San Francisco Refinery RODEO, CA

Key Considerations

Any situation may present ethical choices, and the appropriate course of action may be difficult to identify. Before you act:

Make sure you have all the facts.
In order to reach the right solutions, we must be as fully informed as possible.

Consider what specifically you are being asked to do and whether it seems unethical or improper.
This will enable you to focus on the specific question you are faced with and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it may well be.

Clarify your responsibility and role.
In most situations, there is shared responsibility. Are your colleagues informed? It may help to get others involved and discuss the issue.

Discuss the issue with your supervisor.
In many cases, your supervisor will be more knowledgeable about the question and should be brought into the decision-making process. Remember that it is your supervisor's responsibility to help resolve issues.

Seek help from Company resources.
In the rare case where it may not be appropriate to discuss an issue with your supervisor or where you do not feel comfortable approaching your supervisor with your question, discuss it with any other manager or your local or corporate Human Resources representative. You may also contact any of the resources listed in the "Seeking Advice and Reporting Concerns" section.

You may report ethical violations in confidence and without fear of retaliation.
If your situation requires that your identity be kept secret, your anonymity will be protected except to the extent necessary to complete a thorough investigation. The Company does not permit retaliation of any kind against employees who make good faith reports of suspected ethical violations.

Always ask first, act later.
If you are unsure of what to do in any situation, seek guidance before you act. Discuss the situation with your supervisor or manager, your Human Resources representative, or a member of the Global Compliance and Ethics office.

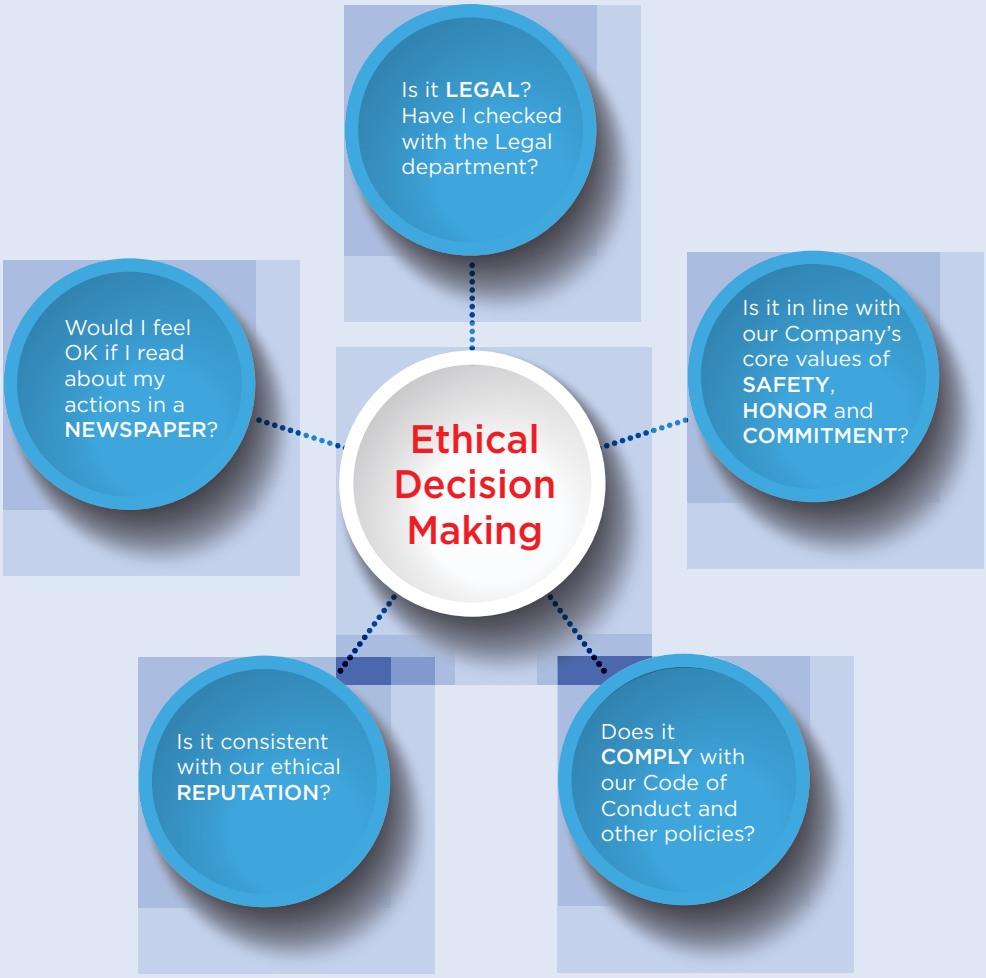
If you are not sure what to do, speak up and get the advice and guidance you need. If you are still in doubt, seek guidance by following the steps set forth in the "Seeking Advice and Reporting Concerns" section.

Phillips 66 Research Center BARTLESVILLE, OK

Doing It Right

Facing Ethical Dilemmas

Our business actions and decisions should always reflect positively on the Company. To maintain trust within and outside the Company, we should be alert to and promptly raise any questions or concerns about business conduct or ethical issues. While our Code of Conduct sets out in general terms the standards of business conduct we are to follow, no guidebook can address every situation we may encounter. **When you encounter a situation in which the right way to act is not immediately clear, ask yourself:**



Don't take action if you answered "No" to any of these questions.

When faced with an ethical dilemma, it's important to ensure you understand all aspects of the issue, including who is affected, why and the potential benefits and consequences of the decisions. Always take personal responsibility for doing the right thing.

Promoting a Positive Work Environment

Equal Employment Opportunity

We all want and deserve a workplace where we feel respected and appreciated. Our policies are designed to ensure that employees are treated fairly and with respect, by the Company and each other.

The Company is deeply committed to fair and nondiscriminatory treatment for employees. We provide equal opportunity for all qualified persons without regard to race, religious creed, color, national origin, ancestry, physical disability, mental condition, genetic information, marital status, sex, gender, gender identity, gender expression, age, sexual orientation, or military and veteran status or any legally protected status. This applies to, but is not limited to, recruitment, recruitment advertising, hiring, training, promotion, transfer, demotion, discipline, layoff, and termination, rate of pay, or other forms of compensation, and all other aspects of employment.

If you feel you are a victim of discrimination, you have a right to voice your concerns. See the "Seeking Advice and Reporting Concerns" section. Reprisals or retribution against an employee who files a report in good faith will not be tolerated.

For additional information, please refer to the Phillips 66 Global Equal Employment Opportunity Policy.

Harassment-Free/Discrimination-Free Workplace

The Company is committed to maintaining a work environment that is free of all forms of unlawful conduct, including sexual or other forms of unlawful harassment. This includes a prohibition of any actions by employees, supervisors or management that abuse individual dignity through slurs or jokes on the basis of race, color, religion, gender, sexual orientation, national origin, age, disability, veteran status, genetic information, or any legally protected status, or other objectionable conduct, including harassment, bullying or discriminating conduct that interferes with another employee's performance. Such conduct is unacceptable and will not be tolerated.

Unwelcome sexual advances or other inappropriate personal conduct creating an intimidating, hostile or offensive working environment are prohibited.

Sexual harassment may take many forms, including, but not limited to, overt advances, demeaning comments, language and gestures. The Company will not tolerate abusive language, physical violence or the threat of physical violence at the Company.

Employees are expected to cooperate fully in the Company's investigation of reports. Reprisals or retribution against an employee who files a complaint in good faith will not be tolerated.

For additional information, refer to the Phillips 66 Global Equal Employment Opportunity Policy.

Health, Safety and Environment

Safety is one of our core values. It is the foundation for how we operate and conduct business. To live this core value, we must plan and execute our business in a manner that protects the health and safety of our employees, contractors, vendors, and the communities in which we operate.

We are committed to the safety of everyone who works in our facilities, lives in the communities where we operate or uses one of our products. We will conduct our business with care for the environment, and we must understand and comply with all applicable laws, regulations, and Company policies relating to health and safety.

Stop Work Authority
All employees and contractors have the responsibility and authority to stop work any time an unsafe condition, practice or hazard exists.

We should immediately report all incidents, regardless of how minor, and any potential hazards to workplace health and safety. See the Health, Safety and Environment (HSE) site for more information, or refer to the "Seeking Advice and Reporting Concerns" section.

The protection of our employees, premises, assets, operations and reputation is fundamental to our core values and the success of the Company. Security is a shared responsibility, and it is incumbent upon every employee to do their part to help secure our operations, our workplaces, our reputation and, most importantly, our people. All forms of threats and acts of violence against employees, contractors, visitors or others in the workplace are prohibited. Threats of violence, even if made in a joking manner, will not be tolerated.

Firearms and other weapons are strictly prohibited on Company property or on the person of an employee while conducting Company business. Company property includes developed and undeveloped Company-owned or -controlled land, buildings, parking lots, vehicles, and recreation areas. Local management, with the concurrence of the manager of Global Security, is authorized to grant exceptions for special circumstances.

For additional information, refer to the Phillips 66 Firearms-Weapons Policy and Violence in the Workplace Policy.

We are committed to promoting environmental stewardship around the world. Employees must understand and comply with the environmental laws and regulations that affect our business activities, as well as related Company and operating unit policies and procedures. Contractors, suppliers and others who work with us also must follow the applicable laws and regulations.

In addition to complying with applicable environmental laws and regulations, the Company has various HSE policies, standards and procedures in place, which are available on the Phillips 66 intranet site.

For additional information, refer to the Phillips 66 Health, Safety and Environment policies, standards and procedures.

Oklahoma City Terminal OKLAHOMA CITY, OK

Human Rights

We recognize and respect the dignity of all human beings. Although governments have the primary responsibility for protecting human rights, we believe business has a role in promoting respect for human rights throughout the world, as do other representative groups in civil society. We embrace the right of all people to live their lives free from social, political or economic discrimination or abuse.

We will conduct our operations within our sphere of influence and business role, according to our Company values, ethics and policies. Specifically, we will not hold any person in slavery or servitude or use forced or indentured labor, nor engage in human trafficking, and we shall seek to ensure that our supply chains are free of such practices. Our key policies that reflect our intent regarding human rights include this Code of Conduct; our Human Rights Position; our Health, Safety and Environment policies; our Business Partner Principles of Conduct; and our position on inclusion and diversity. These address how we conduct our business with respect for all people and the environment, our accountability and responsibility to communities, ethical and trustworthy relationships, and dialogue with our stakeholders. Our position and actions with respect to human rights are set forth in the California Transparency in Supply Chain Act Disclosure, our Sustainability Report, our Modern Slavery Statement and our Human Rights Position.

Substance Abuse

At Phillips 66, our objective is to create and maintain an operating environment free of substance abuse. We believe that substance abuse increases the potential for accidents, absenteeism, substandard performance, and poor employee morale and health, as well as damage to the Company's reputation. The Company has zero tolerance for violations of the Substance Abuse Policy, and the employment of even first-time offenders will be terminated in accordance with such policy and subject to applicable law.

If you know of or suspect substance abuse-related issues, you should report the situation immediately to your manager, supervisor or another resource listed in the "Seeking Advice and Reporting Concerns" section.

For additional information, refer to the Phillips 66 Global Substance Abuse Policy.

Ponca City Refinery PONCA CITY, OK

Building and Maintaining Business Relationships

Avoiding Conflicts of Interest

The Company respects the rights of employees to manage their personal affairs and investments and does not wish to intrude upon their personal lives. At the same time, employees should avoid any situation that may involve a conflict between their personal interests and the interests of the Company. As in all other facets of their duties, employees' dealings with customers, suppliers, contractors, competitors or any person doing or seeking to do business with the Company must be in the best interest of the Company to the exclusion or consideration of personal preference or advantage.

A "conflict of interest" occurs when our private interests interfere in any way with the interests of the Company. It is equally important to avoid even the appearance of a conflict of interest — where a reasonable observer might assume there is a conflict and, therefore, a loss of objectivity in dealings on behalf of the Company.

For our purposes, a conflict of interest is any situation where your personal interests compete or interfere (or appear to compete or interfere) with your ability to objectively perform your job or with your obligation as a Phillips 66 employee to protect and further the interests of Phillips 66. Employees should avoid any situation that may involve a conflict between their personal interests and the interests of the Company.

Actions that might involve a conflict of interest, or the appearance of one, should be fully disclosed in writing to the employee's management for review and approval as soon as the conflict or potential conflict arises. Employees who knowingly fail to disclose a conflict of interest may be subject to disciplinary action, up to and including termination.

San Francisco Refinery RODEO, CA

Some situations require written disclosure and management approval. In some cases, employees' job duties at the Company may conflict with their outside interests. The following situations require written disclosure and management review to avoid actual or apparent conflicts of interest.

- Employees working for suppliers, contractors or customers
- Ownership by the employee or, to the employee's knowledge, by a member of the employee's immediate family (defined as spouse, child, parents, sibling or domestic partner) of a significant financial interest in any outside enterprise that does or seeks to do business with or is a competitor of the Company
- Ownership by the employee or, to the employee's knowledge, by a member of the employee's immediate family, of a significant financial interest in oil and natural gas leases, royalties, or mining interests that result in business dealings with the Company
- Serving as a director, officer, partner, consultant of, or in a managerial position with, or employment in a technical capacity by, any outside enterprise that does, or is seeking to do, business with or is a competitor of the Company
- Acting as a broker, finder, go-between or otherwise for the benefit of a third party in transactions involving or potentially involving the Company or its interests
- Any other arrangement or circumstance, including family or personal relationships, which might dissuade the employee from acting in the best interest of the Company

These situations may or may not present a conflict but must be carefully reviewed and appropriate mitigation steps implemented. For example, if the employee's job includes responsibilities over a Company customer, supplier or contractor in which they have a financial interest, it may be necessary to reassign job duties or take other steps to eliminate the potential for a conflict of interest.

Following management review, approval or disapproval of the situation, it should be documented in writing to the Global Compliance and Ethics office. The employee must note the conflict on each Annual Ethics Compliance Certification, as long as the conflict or potential conflict of interest continues. Other situations also require special consideration. For example, officers and directors of the Company should specifically inform, in writing, the general counsel prior to accepting appointment to the board of directors or the advisory board of any public or privately held company, so that any disclosure requirements and possible conflict of interest issues involved may be analyzed.

In addition, any related party transaction involving a director or executive officer requires review by the designated committee of the Board. Related party transactions are any transactions in which the Company or its affiliates are participants and in which any director or executive officer, or any member of their immediate family, has a direct or indirect material interest. There are special disclosure obligations pertaining to related party transactions. As a result, directors must bring to the attention of the general counsel and the chair of the Nominating and Governance Committee, and executive officers must bring to the attention of the general counsel and the chair of the Audit and Finance Committee, any transaction of which they are aware that may constitute a "related party transaction."

Resolving Conflicts of Interest

If a conflict of interest is considered to be unacceptable, management (in conjunction with the Global Compliance and Ethics office) shall work with the employee to promptly resolve the matter. In questions of conflict of interest, the term "family" should be interpreted broadly to include your, as well as your spouse's extended family.

The key to a review of potential conflicts is whether the employee's duties for the Company, or those of their subordinates, require making decisions that could be influenced by the interest reported. Other considerations include, but are not limited to, whether or not:

- The outside interest does business or competes with the employee's business, function or site
- The employee has an active, managerial or decision-making role in the outside interest
- The employee has access to Company information potentially useful to the outside interest
- Public disclosure of the facts will embarrass the Company

Significant Financial Interest

A "significant financial interest" is a direct or indirect aggregate interest of an employee and family members of more than:

- 1% of any class of the outstanding securities of a firm or a corporation
- 10% interest in a partnership or association
- 5% or more of the employee's total assets or 5% or more of the employee's gross income

In applying the criteria to determine whether a financial interest is "significant," (i) interests in publicly traded securities are excluded and (ii) total assets and gross income are to be evaluated separately.

For example, if an employee owns 1,000 shares of a competitor's stock, the employee would have a significant financial interest if the value of the shares exceeds 5% of the employee's total assets. The employee would have a significant financial interest also if dividends from the shares are more than 5% of the employee's gross income, even though the value of the shares is less than 5% of the employee's total assets.

However, ownership of shares in any firm whose stock is listed on a stock exchange or whose stock is actively traded need not be reported as a conflict, unless such ownership exceeds 1% of the outstanding capital stock of the firm.

Houston Headquarters HOUSTON, TX

Outside Work by Employees

Company employees may wish to take on additional part-time work with organizations that are not our competitors, customers or suppliers. Additionally, employees may wish to accept a voluntary, elected or appointed position with a charitable or political entity. Such work in itself does not constitute a conflict of interest. The second job or position, however, must be strictly separated from the employee's job at the Company.

- Outside work must not be done on Company time and must not involve the use of Company resources
- The employee should not attempt to sell products or services from the outside work to the Company
- Performance of the off-duty work must not interfere with or prevent the employee from devoting the time and effort needed to fulfill the employee's primary duties and obligations as a Company employee, which must remain primary

If you are uncertain whether outside work could represent a conflict of interest (or, if required by an employment contract), consult your manager and obtain approval from the Global Compliance and Ethics office before starting the outside work. Either you or your manager may obtain guidance from the resources identified in the "Seeking Advice and Reporting Concerns" section.

If you wish to run for elected office or you have been asked to serve in an appointed governmental position, you should review the Employees in Government Positions Guidelines and contact the Government Affairs department.

Fees and Honorariums

With management approval, employees are allowed to serve as a director of another company (as long as the company is not a customer, supplier, vendor or contractor of or for the Company), give lectures, conduct seminars, or publish articles and books. Any fees, honorariums or reimbursements arising from such activities performed in conjunction with an employee's job duties or at the direction of the Company must be transferred to the Company, unless written management approval is given to retain them. A copy of the management approval will be filed in the employee's personnel file.

Soliciting Suppliers, Vendors, Contractors or Local Merchants

Employees should not request donations from suppliers, contractors or local merchants to help support or pay for employee social functions or sporting events. The one exception where donations are allowed is for Companywide, sanctioned, charitable events. Solicitations of cash, merchandise and services are not allowed because they could be perceived to create obligations to keep, increase or obtain the Company business.

We want our vendors and suppliers to understand that their business relationship with the Company is based solely on their ability to competitively meet our business needs.

Gifts, Entertainment and Travel

The Company has established policies and procedures for review, approval in advance, and recording of gifts, entertainment and travel requests, whether received by a Company employee or proposed to be given to a third party, if in excess of specified thresholds.

For additional information, refer to the Phillips 66 Global Gift, Entertainment and Travel Policy (GET) and the resources available on the Global Compliance and Ethics intranet site.

If in doubt as to the integrity or impropriety of any gift, entertainment or travel proposed to be given to, or received from a third party on behalf of the Company, consult with the Global Compliance and Ethics office in advance of the commitment.

Receiving Gifts, Entertainment and Travel

Business gifts, entertainment and travel are customary courtesies designed to build goodwill among business partners. These courtesies include items of nominal value, such as meals and beverages, tickets to sporting or cultural events, and other similarly valued merchandise or services. In some cultures, business gifts play an important role in developing business relationships. However, a problem may arise when such courtesies compromise — or appear to compromise — our ability to make objective and fair business decisions.

Employees should neither seek nor accept for themselves or others any entertainment or gifts without a legitimate business purpose, nor seek or accept loans (other than conventional loans at market rates from lending institutions) from any person or business organization that does or seeks to do business with, or is a competitor of, the Company. In application of this policy:

- Employees may accept for themselves and members of their families common courtesies usually associated with customary business practices
- An especially strict standard is expected with respect to gifts, services, discounts, entertainment or considerations of any kind from suppliers. The Phillips 66 Procurement Policy requires communication with suppliers to go through Procurement during a bid event. Interactions with suppliers during the bid process may come under scrutiny, so any conduct that may have the appearance of being inappropriate, or showing favoritism, must be avoided
- It is never permissible to accept a gift in cash or cash equivalents (e.g., stocks or other forms of marketable securities) of any amount

In certain situations, refusal of offers of entertainment or gifts with a value substantially in excess of customary business practices can result in awkward business situations. The propriety of employees keeping such valuable gifts for personal use versus turning them over to the Company, donating them to a charity or other disposition should be discussed in each case with the employee's manager. Disposition of such a gift should be documented, regardless of whether it is returned, given to charity or otherwise disposed.

Giving Gifts, Entertainment and Travel

Gifts, entertainment and travel may be given to others at Company expense only if they are:

1. Consistent with customary business practices
2. Not excessive in value and cannot be construed as a bribe or payoff
3. Not in violation of applicable law or ethical standard
4. Not embarrassing to the Company or employee if disclosed publicly

Accounting records and supporting documentation reflecting gifts, entertainment and travel given to others must be accurately stated, including appropriate, clear, and descriptive text and retained in accordance with the Company's Document Records Management policies.

Strict rules apply when we do business with governmental agencies and officials. Because of the sensitive nature of these relationships, talk with your supervisor and submit a GET request to ensure compliance before offering or giving any gifts, entertainment or travel to government employees.

Commissions, Rebates, Discounts, Credits and Allowances

Sales-related commissions, rebates, discounts, credits and allowances are customary business inducements, but careful attention is needed to avoid illegal or unethical payments and to ensure compliance with various currency exchange controls and tax regulations. Such business-inducement payments must be reasonable in value, competitively justified, properly documented, and made to the business entity to which the original sales agreement or invoice was made or issued.

They should not be made to individual officers, employees or agents of that entity or to a related business entity. They should be made only in the country of that entity's place of business.

Commissions, rebates, credits, discounts or allowances that are paid or granted by the Company in conformity with standard trade terms for the industry, catalog prices or other standard procedures are deemed to have been established in writing and need not be documented further.

Lake Charles Refinery WESTLAKE, LA

Obeying the Law

It is the Company's policy to comply with all laws and regulations, and compliance with all applicable laws and regulations is required of all employees. As our employees conduct business, they may encounter a variety of legal issues, particularly in the areas described below.

The Company holds information and training sessions to promote compliance with laws, rules and regulations. If you have questions on specific laws or regulations, contact the Phillips 66 Legal department or the Global Compliance and Ethics office.

Anti-Boycott Laws

U.S. anti-boycott laws encourage, and in some cases require, U.S. firms, their foreign subsidiaries and their worldwide employees to refuse to participate in international boycotts that the U.S. government does not support. These laws effectively prevent U.S. companies from being used to implement another country's foreign policy. The laws also require reporting to the U.S. government of specific requests to agree to an act that is prohibited under the anti-boycott laws (including lawful boycott-related requests), even if the Company does not agree to the request.

For additional information, refer to the Phillips 66 Anti-Boycott Policy and the additional resources available on the Global Compliance and Ethics intranet site.

If you become aware of transactions or activities that involve international boycotts, you must report them to your manager, the Global Compliance and Ethics office, or the Ethics Help Line immediately. See the "Seeking Advice and Reporting Concerns" section.

Anti-Corruption Laws

We oppose corruption in any form. Our Global Anti-Corruption Policy helps ensure our compliance with the anti-corruption laws of any country in which we conduct business. This policy prohibits employees, contractors, business agents or other third parties acting on the Company's behalf from paying or promising to pay anything of value to (or receiving or soliciting anything of value from) government officials or private individuals designed or intended to corruptly influence business decisions. "Anything of value" can include cash, gifts, entertainment, travel or other hospitality, regardless of the amount. Simply stated, do not pay, try to pay, receive, or try to receive bribes or other improper payments.

Foreign Corrupt Practices Act (FCPA)
This U.S. law prohibits making corrupt payments of anything of value to a non-U.S. government official in order to influence that individual in obtaining, retaining or directing business to a company or individual.

The FCPA has two main provisions. The first makes it illegal to bribe non-U.S. government officials. The second imposes strict internal controls and record-keeping requirements upon publicly traded U.S. companies like Phillips 66 to minimize the possibility of a company creating "slush funds" or other improper accounts that can be used for bribes. Phillips 66 subsidiaries are also subject to the FCPA's record-keeping requirements.

UK Bribery Act (UKBA)
This U.K. law applies to a company, including a U.S. company or its employees, when it conducts any part of its business in the U.K. Similar to the FCPA, the UKBA prohibits bribing government officials in order to obtain or retain business or to secure an improper business advantage. In addition, the UKBA prohibitions apply not only to government officials but also to private entities or persons.

Other countries in which we operate have also adopted laws criminalizing the bribery of government officials or have anti-corruption laws prohibiting acts of bribery.

Facilitating Payments and the FCPA
Facilitating Payments are small payments made to government officials to expedite or secure the performance of a routine, non-discretionary governmental activity that the government official is required to perform, such as granting a permit or license, processing visas or work orders, or loading or unloading cargo. Although these payments are not prohibited by the FCPA, they are prohibited by the UKBA and Company policy.

For additional information, refer to the Phillips 66 Global Anti-Corruption Policy and additional resources available on the Global Compliance and Ethics intranet site.

If you become aware of transactions, payments or activities that appear abnormal, unusual or excessive, you must report them at once to your manager, the Global Compliance and Ethics office or the Ethics Help Line. See the "Seeking Advice and Reporting Concerns" section.

Anti-Money Laundering/Financial Crime/Terrorist Financing

We are committed to the prevention of financial crime and terrorist financing. Money laundering is a process whereby the proceeds of crime are "washed" through the global banking system and ultimately integrated into the legitimate economy. Terrorist financing uses legitimate money to fund the activities of terrorist organizations.

Tax evasion is the illegal practice whereby taxes are intentionally understated or underpaid. In some countries in which the Company operates, the criminal facilitation by a person (e.g., an employee or an agent) or tax evasion by a third party is itself a financial crime.

We conduct business with thousands of counterparties worldwide, some of which are located in jurisdictions where the risk of financial crimes is high. Therefore, we screen our counterparties in order to identify, among other things, their directors and ultimate beneficial owners, to help prevent the possibility of entering into an agreement or transaction with an organization or individual involved in, or alleged to be involved in, a financial crime like money laundering or terrorist financing. We also check counterparties against sanctioned or blocked lists, including the U.S. Office of Foreign Assets Control Specialty Designated Nationals List and the U.K. HM Treasury Financial Sanction lists.

Always be alert to red flags, such as:

- Transactions or activities that do not make commercial sense (such as buying or selling at a loss)
- Business propositions that sound too good to be true
- "Inadvertent" overpayments made by a counterparty, and the surplus is requested to be paid to a third party
- Requests to pay third parties (other than the counterparty) or receive funds from a third party (other than the counterparty)

- Last-minute changes to payment instructions
- Unusual or last-minute requests to amend or misrepresent documentation (e.g., invoices or import/export records)
- Reluctance to cooperate in verifying the identity of the counterparty
- Reluctance or evasion in explaining the rationale for a requested course of action

For additional information, refer to the Global 3rd Party Due Diligence Policy.

If you become aware of transactions, payments or activities that appear abnormal, unusual or excessive, you must report them at once to your manager, the Global Compliance and Ethics office or the Ethics Help Line. See the "Seeking Advice and Reporting Concerns" section.

Antitrust Laws

Antitrust laws, also known as competition laws outside of the United States, are designed to ensure a fair and competitive free-market system. While the Company will compete vigorously in the marketplace, we will comply with the applicable antitrust and competition laws wherever we do business. This means that we will compete on the merits of our products and services, the prices we charge, and the customer loyalty we earn.

Some of the most serious antitrust offenses occur between competitors, such as agreements to fix prices, restrict output, rig bids or to divide customers, territories or markets. It is therefore important to avoid discussions with competitors regarding pricing, terms and conditions, costs, marketing or production plans, customers, and any other proprietary or confidential information. Antitrust laws also may apply in other (less obvious) circumstances, like benchmarking efforts, trade association meetings or strategic alliances, or joint ventures involving competitors. Unlawful agreements need not be written or even consist of express commitments.

Agreements can be inferred based on "loose talk," informal discussions or the mere exchange of certain information. If you believe a conversation with a competitor enters an inappropriate area, end the conversation at once.

Be accurate and truthful with customers, and take particular care when describing the quality, features or availability of our products and services. Be similarly careful if you describe a competitor's products or services. It is unwise to criticize a competitor to a customer, and it is inappropriate to interfere with any contract between a competitor and a customer of the competitor.

For additional information, refer to the Phillips 66 Antitrust and Competition Law Policy, the Antitrust Supply and Trading Guidelines, and the additional resources available on the Global Compliance and Ethics intranet site.

If you become aware of actual or potential antitrust violations, you must report them at once to your manager, the Global Compliance and Ethics office, or the Ethics Help Line. See the "Seeking Advice and Reporting Concerns" section.

Commodity Trading

The Company engages in commodity trading activities principally related to crude oil and natural gas and their associated refined products. These physical and financial transactions are governed by laws, regulations, and rules of regulators and commodity exchanges in the jurisdictions in which we trade commodities. Antitrust, securities, money laundering, terrorist financing and trade sanctions laws can also apply to these transactions. Employees who trade on behalf of the Company must adhere to all applicable laws, rules and Company policies and procedures.

For additional information about Phillips 66 trading-related policies and procedures, refer to the Commercial Compliance intranet site.

If you become aware of transactions, payments or activities that appear abnormal, unusual or excessive, you must report them at once to your manager, the Global Compliance and Ethics office or the Ethics Help Line. See the "Seeking Advice and Reporting Concerns" section.

Data Privacy and Personal Information

Phillips 66 is committed to respecting the privacy and data security of individuals and users of systems and services owned and operated by Phillips 66. To efficiently conduct and carry out its business operations and market its products and services, Phillips 66 collects and processes personal information of active and prospective employees, customers, consumers, vendors and businesses. Personal data will only be used for legitimate business purposes. We strive to protect the security and confidentiality of the information we collect; as with any transmission over the internet, however, there is always some element of risk involved in sending personal information, and no data transmission can be guaranteed to be 100% secure. The Company has established policies and procedures to safeguard the personal information of our employees, customers and other third parties.

Employment Data

In fulfilling our job responsibilities, we may have access to sensitive personal information, including, but not limited to, personally identifiable information, such as salary and benefits data, financial and banking information, or medical information.

Any employee authorized to access personally identifiable information is obligated to safeguard that information from unauthorized access.

Confidentiality should not be assumed when using Company communication systems. Subject to applicable law, the Company reserves the right to access, monitor and disclose information contained in electronic communication systems as necessary for legitimate business purposes. Use good judgment and do not view, send or store any information in electronic communication systems that you would not want to be seen or heard by other individuals.

If you become aware of an actual or potential data breach, you must report it at once to your manager, the Global Compliance and Ethics office or the Ethics Help Line. See the "Seeking Advice and Reporting Concerns" section.

For additional information, refer to the Phillips 66 Employee Information Privacy Policy, Privacy Statement and Information Security and Protection Policy.

Economic Sanctions

We will not, on our own or through any third party acting on our behalf, do business in, conduct any activity with, or provide any goods, services, software or technology to or for the benefit of any country, individuals, group, entity or vessel that is sanctioned by the government of any country where we do business, unless we are authorized by law or the appropriate government license to do so.

For additional information, refer to the Phillips 66 Global Sanctioned Countries Policy and the additional resources available on the Global Compliance and Ethics intranet site.

If you become aware of actual or potential sanctions violations, you must report them at once to your manager, the Global Compliance and Ethics office or the Ethics Help Line. See the “Seeking Advice and Reporting Concerns” section.

Export Control Laws

We are committed to conducting all business activities in compliance with all export control laws and regulations. Among other things, these laws are designed to promote foreign policy objectives and prevent certain military or “dual-use” (e.g., civilian and military use) items from being used in or by certain countries. Export compliance laws may require prior approval or a license from a designated branch of the U.S. government before an item can be exported.

Exports are not limited to physical shipments of products from one country to another. Examples include:

- Sending or sharing of restricted software or technical data through email or posting it on the internet
- Releasing technology to individuals who are not citizens of the country in which the release takes place

If you become aware of improper, unusual or missing transactions or records related to Company exports, you must report them at once to your manager, the Global Compliance and Ethics office or the Ethics Help Line. See the “Seeking Advice and Reporting Concerns” section.

For additional information, refer to the Phillips 66 Export Compliance Policy. Additional resources are available on the Commercial Compliance intranet site.

Ponca City Refinery PONCA CITY, OK

Financial Reporting Integrity

The Company's financial reporting must comply with generally accepted accounting principles and be accurate, complete, fair, timely and understandable.

To ensure the Company's financial reports are accurate, we rely upon every employee to properly record information impacting or relating to finances, such as information collected and recorded when preparing time sheets or expense statements, approving invoices, signing for or receiving purchased materials, or preparing inventory reports. All employees must properly verify that any financial information for which they are responsible is accurate, complete and timely.

While many of us may not be familiar with accounting procedures, we do our part by ensuring that every business record is accurate, complete and reliable. This standard also applies to all operating reports or records prepared for internal or external purposes, such as environmental data, product test results, quality control reports or sales projections.

Truthful and accurate record keeping is also important because many of these records are critical to the management of our business. Unrecorded or "off-the-books" funds or assets should not be maintained for any purpose. False, misleading or incomplete information undermines our ability to make good business, operational or strategic decisions and, in some cases, violates the law.

The Company has established accounting standards and procedures to ensure that assets are protected and properly used and that financial records and reports are accurate and reliable. Employees share the responsibility for maintaining and complying with required internal controls.

If you become aware of transactions, payments or activities that could impact our financial reporting integrity, you must report them at once to your manager, the Global Compliance and Ethics office or the Ethics Help Line. See the "Seeking Advice and Reporting Concerns" section.

For additional information, refer to the Accounting, Internal Controls and External Reporting policies and procedures available on the Finance intranet site.

Government Contracting

In pursuing business with governments of various countries, the standards of conduct and prohibited practices may be different from those in commercial business. In the U.S. and in many countries throughout the world, the giving or offering of business courtesies to government officials is severely limited, and the rules governing such activity change often. Before giving or offering any gift, entertainment or travel to a government official, refer to the Gift, Entertainment and Travel Policy.

When Phillips 66 accepts U.S. government contracts or subcontracts, we have an obligation to the public to ensure that we administer those contracts and deliver our products and services in a manner that fully complies with federal procurement laws and regulations, as well as our own high standards. This applies equally to direct contracts with the government and to subcontracts in which the Company is providing products and services that are procured and used by others under contract with the federal government.

If you become aware of improper or unapproved activities related to government contracts or government officials, you must

report them at once to your manager, the Global Compliance and Ethics office or the Ethics Help Line. See the "Seeking Advice and Reporting Concerns" section.

For additional information about government contracting, refer to the resources available on the Legal department intranet site.

Import Control Laws

The Company's policy is to comply with all applicable import laws and regulations of all countries where we engage in import operations. Each country has its own requirements regarding the importation of merchandise into its territory, and a license or other registration may be required before an entity may act as an "importer of record." Failure to comply with applicable import laws can result in monetary fines, delay of import shipments, seizure of import shipments, and in extreme cases, loss of import rights and criminal penalties.

If you become aware of improper, unusual or missing transactions or records related to Company imports, you must report them at once to your manager, the Global Compliance and Ethics office or the Ethics Help Line. See the "Seeking Advice and Reporting Concerns" section.

For additional information, refer to the Phillips 66 Import Compliance Policy. Additional resources are available on the Commercial Compliance intranet site.

Insider Trading Laws

Using material, nonpublic information for trading or advising others to trade in securities is both unethical and illegal. Material, nonpublic inside information is any information about a company (the Company, our suppliers or customers) that has not reached the general marketplace and is likely to be considered important by investors when deciding whether to trade. Additionally, if you share material, nonpublic information with others, including family members, and they trade based on that information that is considered "tipping," and both of you may be guilty of violating the law. The term "trade" includes all securities transactions in the open market and includes transactions in Company plans, such as employee savings and stock option plans.

Examples of material information include:

- Information about the acquisition or loss of a significant contract
- Financial forecasts or earnings (for a company as a whole or for a major subsidiary or division)
- Major management changes
- A new product, discovery or invention
- Proposed significant acquisitions or mergers
- The purchase or sale of significant assets
- Developments in significant proceedings or litigation
- Developments in labor negotiations
- Restructurings and reorganizations
- Stock splits
- Dividend changes

Insider trading laws apply to officers, directors, employees and agents of the Company, as well as suppliers and consultants who have access to such information. Employees who are involved in insider trading (either by personally engaging in trading or by disclosing information to others who trade on that information) may be subject to disciplinary action, up to and including termination.

Because of the extremely sensitive nature of and severe penalties associated with insider

trading, you should consult the Legal department before you buy or sell public securities if you have any concerns.

If you become aware of improper use or dissemination of material, nonpublic information, you must report it at once to your manager, the Global Compliance and Ethics office or the Ethics Help Line. See the "Seeking Advice and Reporting Concerns" section.

For additional information, refer to the Phillips 66 Insider Trading Policy, the Insider Trading Blackout Period Calendar and the resources available on the Legal department intranet site.

Protecting Company Assets

Competitive Intelligence and Customer/Supplier Information

Competitive information is a valuable tool that allows us to understand and manage our markets, products and services, so we can better meet our customers' needs. However, employees are expected to gather and use such information in an ethical manner and in compliance with the law.

Theft, illegal entry, black market purchases, blackmail, electronic eavesdropping and threats are other improper methods of collection and use of market intelligence. Employees of competitors or suppliers should not be asked to reveal proprietary information. Our employees should likewise never divulge proprietary information about their former employers, and we will not ask them to.

Similarly, the records we maintain on our customers should only be used for Company business purposes. This information should not be released publicly or provided to others without proper authorization and for legitimate business reasons.

Any proprietary or nonpublic information about our competitors or suppliers should not be used if you suspect it has been obtained improperly or misdirected to you in error (such as misdirected emails, faxes or bid information).

Any employee working with outside consultants or contractors is obligated to make such third parties aware of these guidelines. Contractors and other third parties working on behalf of the Company are required to comply with these obligations.

Excel Paralubes laboratory WESTLAKE, LA

Intellectual Property

Our creativity and innovations make significant contributions to the Company's success in the marketplace. We must protect and leverage our intellectual property, which includes inventions, discoveries, improvements, ideas, computer programs and related documentation, marketing strategies, trademarks, patents, copyrights, Company processes and procedures, and other confidential, sensitive and proprietary information.

In many situations, to legally protect the Company's rights in the intellectual property, we must not disclose it to others outside of the Company without the proper safeguards or approval from management. Examples of intellectual property and confidential or proprietary information include, but are not limited to:

- Written business or market plans
- Research data
- Customer lists and contact information
- Objectives and strategies
- Unpublished financial or pricing information
- Proposed asset acquisitions or dispositions
- Processes and formulas
- Marketing proposals, strategies and campaigns
- Prospective (new) brands or trademarks
- Copyrighted works (written, hard copies or digital files)

Intellectual Property of Third Parties

The Company respects the intellectual property rights of others by not intentionally or knowingly using the intellectual property of other parties without the proper permissions.

Phillips 66 employees are obligated to protect the confidentiality and intellectual property of third parties with which the Company does business.

For additional information, refer to the Phillips 66 Copyright Policy.

Nondisclosure

We are obligated to protect the confidentiality and intellectual property of Phillips 66 and the parties with whom we do business. Employees authorized to access proprietary and confidential information, intellectual property, or sensitive personal information are obliged to safeguard it from unauthorized access and:

- Not disclose this information to persons outside the Company, unless legally authorized or approved by management
- Exercise caution when posting communications and sharing information on social media or when discussing Company business in public places
- Not use this information for personal benefit or for the benefit of persons outside the Company

Electronic Communications Systems

Our internal electronic communications systems are to be used primarily for Company business and never for personal gain or any improper advantage. Except to the extent specifically prohibited under local policy, employees are generally allowed to use Company internet access, email, electronic scanning, fax and telephone systems for occasional and reasonable personal use, as long as there is no significant added cost to the Company, it does not interfere with work duties, and it is not related to an illegal activity or to any outside business. If you have a question about whether it is permissible to use any Company assets for purposes other than business, ask your manager for approval.

- Don't access, send or download any information that could be insulting or offensive to another person, such as sexually explicit messages, cartoons, jokes, slurs or any other message or images that could be viewed as harassment
- Remember that "flooding" our systems with junk email hampers the ability of our systems to handle legitimate Company business
- Personal privacy is not always protected on communication systems. Subject to applicable law, the Company reserves the right to access and disclose any information or communication as necessary for legitimate business purposes. Use good judgment, and do not access, send a message or store any information that you would not want to be seen or heard by other individuals

For additional information, refer to the Phillips 66 Electronic Communications Systems Usage Policy.

Protection and Use of Company Assets

Proper protection and use of Company assets, including proprietary information, is the responsibility of each employee. Our equipment, vehicles, tools and supplies have been acquired solely for the purpose of conducting Company business. They may not be used for your personal benefit, sold, loaned, given away or disposed of without proper authorization.

Taking Company property from our facilities without permission is regarded as theft, and any employee found to have done so may be subject to disciplinary action, up to and including termination. Company credit cards, cash, checks or money orders should never be used for personal use. Vouchers, time sheets, invoices, benefit claims and travel and expense reimbursement reports are used to obtain Company funds and property. Inaccurate or incomplete documents can result in improper and potentially fraudulent, disposition or acquisition of Company assets.

If you become aware of the theft or misuse of Company assets, you must report it at once to your manager, the Global Compliance and Ethics office or the Ethics Help Line. See the "Seeking Advice and Reporting Concerns" section.

Corporate Opportunities

Employees are prohibited from personally taking for themselves opportunities that are discovered through the use of Company property, information or position, without the consent of the Board.

No employee may use Company property, information or position for improper personal gain, and no employee may compete with the Company directly or indirectly. Employees and directors owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises.

Protection of Information Resources

Phillips 66 computer and network hardware, software and communication equipment (our information resources) are key components of our business. They are intended for Company business use, and all information processed, transmitted or stored within these assets belongs to the Company and can be monitored at any time, subject to applicable law. Some occasional and reasonable personal use is permitted. However, all use, business or personal, must be consistent with the Company's corporate values.

We are each responsible for protecting these resources from damage, destruction, malware, alteration, theft, fraudulent manipulation and unauthorized access, disclosure or use.

We can follow several simple guidelines to ensure our Company systems are adequately protected.

- Use complex passwords, and do not share them with others, change them periodically, and do not store them where others might see them
- Protect all equipment and data from theft, including when unattended, after hours or away from the office
- Log off if you will be away from your computer while at work or when accessing resources from home for an extended length of time
- Regularly ensure that desktops and laptops are available (connected) to the Company network to allow antivirus and software updates to be applied
- Never circumvent or disable security software, systems or protections

Always have backup plans and procedures that preserve important data and that allow critical work to continue in the event of loss, theft or damage to a computer system.

Use only software that has been properly licensed and authorized by the Company on your computer. Never make unauthorized copies of software. You may use Company-licensed software on home computers only if specified within the license agreements.

For additional information, refer to the Phillips 66 Protection of Company Information Policy.

Records Management

Knowing what documents and information to keep — and for how long — can be confusing. Many times our retention requirements are based on specific statutory and regulatory requirements that are unique to a particular business operation or location. These retention requirements apply to all Company documents, including email and other electronic records, which are as permanent as printed documents and subject to the same records management standards.

If you are notified that documents in your possession may be relevant to litigation, an investigation or an audit, you are required to maintain such records and follow the instructions set forth in the notice or legal hold order. Failing to comply with Company policy and these laws and regulations, even innocently, can have serious tax or legal repercussions. Talk to your supervisor or records management unit head, if you have questions.

For additional information, refer to the Phillips 66 Records Management Policy and Records Management Compliance Standard.

Social Media

Social and digital media is transforming the way we communicate to our employees, stakeholders and customers. Today, social media tools, such as blogs, videos, networking sites and forums are used to share information, express opinions and strengthen relationships in a modern way. We believe the conversations that take place on these social and digital platforms can shape the way the general public views Company products, services, employees, partners, vendors, customers and competitors.

While we respect our employees' and contractors' rights to participate in social media platforms, it is important that the integrity of the Company and our vision, values and policies are maintained and complied. Do not share or post confidential or nonpublic information externally. The Company's policy is not intended to restrict communications or actions legally protected under applicable laws.

When engaging in social media conversations pertaining to the Company, employees should:

- Be respectful
- Be transparent
- Protect confidential information, trade secrets and proprietary and security-related information
- Abide by all Company communications policies
- Respect the rights of others

Use of social media during working time or on Company electronic communication systems is limited to conducting Company business and occasional and reasonable personal use (such personal use, however, must not interfere with work duties, safety or productivity).

For additional information, refer to the Phillips 66 Social Media Policy.

Beaumont Terminal NEDERLAND, TX

Engaging in Political and Lobbying Activities

The Company respects and supports the rights of all employees to participate in political activities in their individual capacity, including making personal political contributions or running for office. Employees will not be reimbursed by the Company for any personal political contributions, and use of corporate resources to campaign for an elected position is strictly prohibited. Employees interested in serving in an elected or appointed governmental position should advise the Government Affairs department to ensure their understanding of corporate policies and possible legal ramifications.

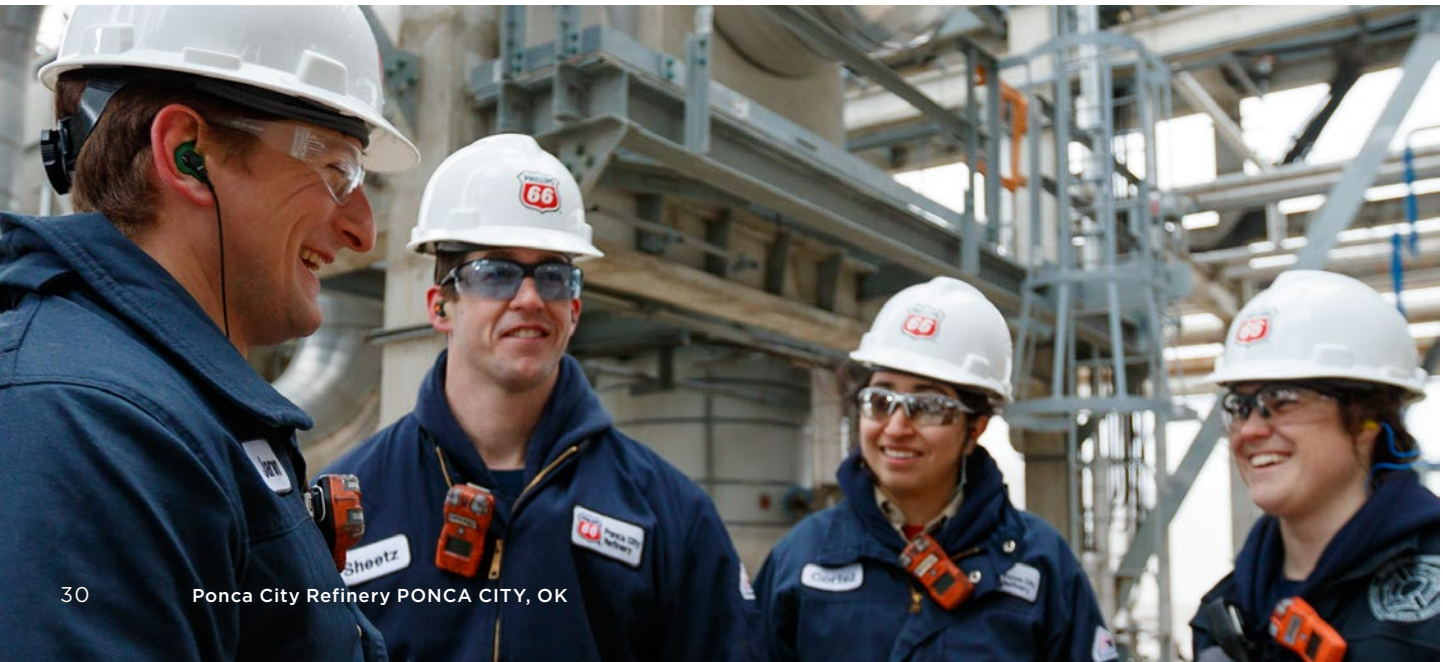
Employees may not make any contribution of Company funds, property or services to any political party or committee, or to any candidate for, or holder of, any office of any government without the expressed prior approval of the Government Affairs department. These restrictions include the use of Company assets, such as employee time, telephones, computers or supplies. Any use of Company assets in political activities requires close scrutiny, as they may be illegal or considered a reportable in-kind contribution by the Company.

The Company may make contributions to candidates and selected political parties or groups in jurisdictions where it is legal to do so, consistent with strict Company guidelines and procedures.

Where appropriate and lawful, we have established U.S. federal and state political action committees (PACs). Participation in an employee PAC is voluntary. No direct or indirect pressure in any form is to be placed on employees to participate in any employee PAC, make any personal political contribution, or participate in the support of any political party or the political candidacy of any individual.

The Company may sometimes express its view on local and national issues that affect its operations publicly and with elected officials. Meetings, letters, emails and other communications between employees and government officials may constitute lobbying, thus requiring special reporting by the Company of salary and other costs that may be considered nondeductible business expenses. Government Affairs will provide appropriate guidelines for such reporting.

For additional information, refer to the Political Activity policies and guidelines.



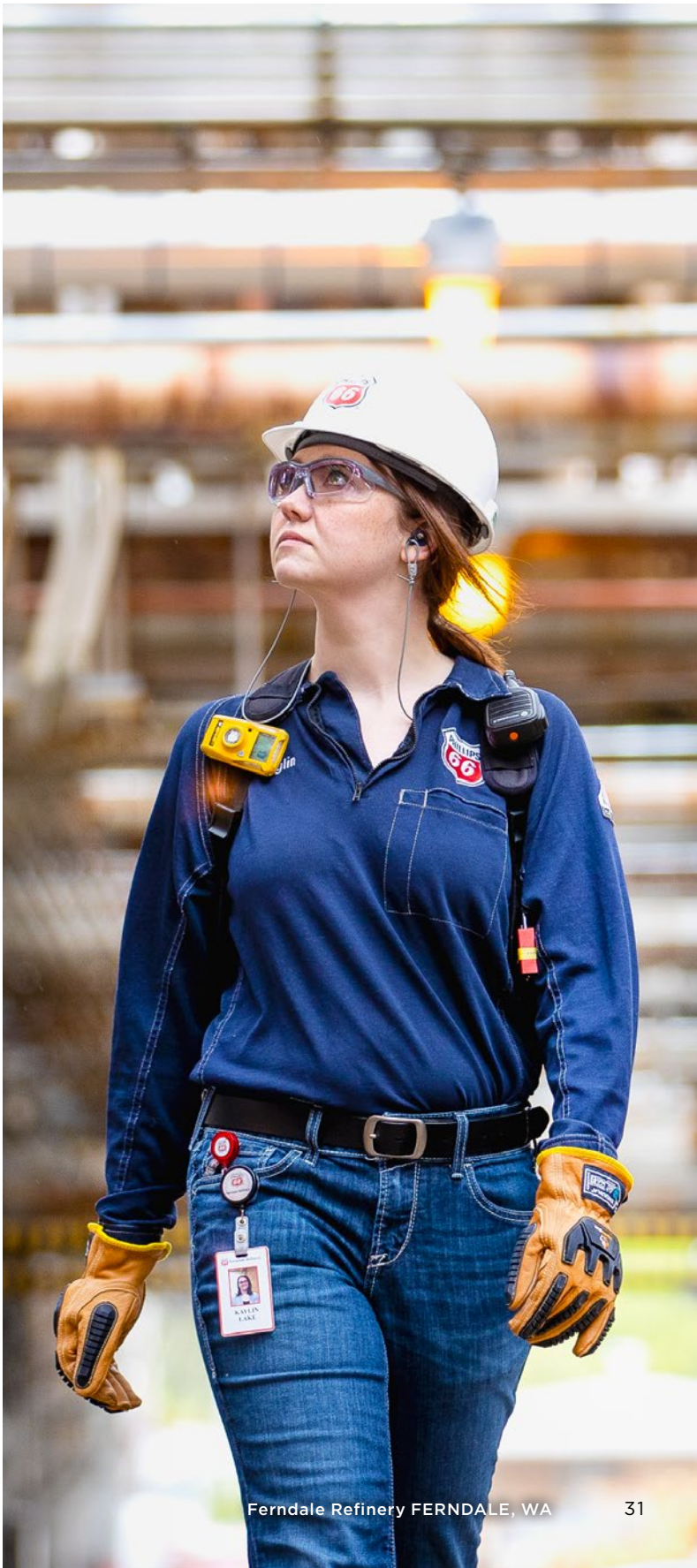
Ponca City Refinery PONCA CITY, OK

Seeking Advice and Reporting Concerns

We value each employee's voice. To create an honest and trusting workplace, the Company welcomes open communication. If something seems "off," regardless of whether it's a big or small issue, let your manager know or make the issue known to one or more of the resources outlined below. Each of us has a responsibility to strive to make the Company a positive place to work, and we all have a right to do so without fearing retaliation. In part, this means creating an environment where everyone feels comfortable raising questions or concerns. By raising an issue, we help ensure an ethical workplace and a culture of integrity.

If you suspect or know of possible business misconduct, you should report your concerns. If after reporting a concern you do not feel that it has been adequately addressed, escalate your concern to any of these resources:

- Your manager
- Your HR representative
- The Legal department
- Email: ethics@p66.com
- Mail: Phillips 66 Global Compliance and Ethics office
  2331 CityWest Blvd.
  Houston, TX 77042, USA
- Phillips 66 Ethics Help Line:
  - 1-855-318-5390 (within the U.S. or Canada)
  - File a report online: phillips66.ethicspoint.com



Ferndale Refinery FERNDALE, WA

Help Line Reporting Process and Confidentiality

All issues brought to the attention of the Global Compliance and Ethics office are handled according to our reporting process. Appropriate action should be taken based on the investigation findings. Issues involving a violation of regulation, law or the Code of Conduct are reported to the Audit & Finance Committee of the Board of Directors.

The Compliance and Ethics Help Line is operated by a third party and is available 24 hours a day, seven days a week. You can call the help line toll-free at 1-855-318-5390 (within North America) or dial your country access number, then 855-318-5390 (outside North America) or you can file a report online.

Representatives fluent in many languages are available. Translation services are also available. Although you are encouraged to identify yourself to assist our Company in effectively addressing your concern, you may choose to remain anonymous. The Company will respect your choice.

The help line is not equipped with caller ID or other devices that can trace the number from which you are calling. If you choose to remain anonymous and would like an update or wish to follow up with the Global Compliance and Ethics office, you can request a follow-up identification code.

The Global Compliance and Ethics office can then ask questions or provide updates through the help line using this number. However, remember that it will be difficult to solve problems or conduct investigations, unless you provide sufficient, detailed information.

We will take care to maintain the confidentiality of your report, consistent with resolving the issue and in accordance with applicable law. Most calls are completely confidential. However, in some circumstances, it may not be possible to guarantee absolute confidentiality due to the Company's need to thoroughly investigate a report or fulfill a legal requirement.

Disciplinary Action

The Company may subject anyone who violates the Code of Conduct or any Company policy, or who knowingly permits another to do so, to disciplinary action, up to and including termination.

Phillips 66 branded fueling station ST. LOUIS, MO

Global Compliance and Ethics
DOING THE RIGHT THING. ALWAYS.

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