

Commitment to Integrity



Code of Business Conduct

Marathon Petroleum Corporation



**Marathon
Petroleum Company LP**



Speedway LLC



**Marathon
Pipe Line LLC**



Language in our Code

Our *Code of Business Conduct* applies to all employees, officers and directors of Marathon Petroleum Corporation and all majority-owned and controlled subsidiaries. We observe the separate legal status and independence of subsidiary companies. However, to make the *Code* easier to read, we use “Company” to refer to each one of these companies, and “we” and “our” as shorthand for our employees, officers and directors who make the Company a leader in integrity.

References to the Company’s Board of Directors or Audit Committee are references to the Marathon Petroleum Corporation Board of Directors or Audit Committee.

Letter from Our President and CEO

To all employees and stakeholders:

We have recently become a publicly traded company, but the concept of integrity is not new to us. Our commitment to do business honestly and fairly began long ago and continues today. In the years to come, many things will change but one responsibility will remain the same: to act with integrity.

Our *Code of Business Conduct* is important. It applies to every individual who works for the Company or represents our good name. A reputation for integrity is one of the most important assets any individual or company can possess. Our good reputation has been created over lifetimes — but it can be destroyed by a single unethical or thoughtless act. That's why it is vital that each and every one of us make a personal commitment to uphold our *Code*.

Our *Code of Business Conduct* will not resolve or answer every question that you have. When it does not, let your good judgment be guided by the principle of always doing the right thing for the right reason. And don't hesitate to bring up issues with your supervisor or manager or other appropriate personnel identified in our *Code*. Open and honest communication up front will prevent many problems later.

A reputation for integrity founded on our *Code of Business Conduct* will help us compete successfully in everything we do.



Gary R. Heminger
President and Chief Executive Officer
Marathon Petroleum Corporation

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Accountability and Responsibility

We will make accountability and responsibility for ethical conduct a strategic business commitment.

Our Commitment

The purpose of our *Code of Business Conduct* is to set forth our commitment to high ethical standards and to reinforce prompt and consistent actions in the maintenance of those standards. We must apply these standards in both letter and spirit. Where the letter of the *Code* is not specific, the spirit must prevail.

Questions? Concerns?
Talk to your management or call the Integrity Helpline at 855-857-5700



When in doubt about what to do, ask yourself this question:

Would I be proud to explain my actions to my family or fellow employees – or to millions of people around the world on tonight's news broadcast?

This is not a hypothetical question. The world is getting smaller and communications are almost instantaneous. What we do today is known immediately around the world. So always act in such a way that you would be proud of your actions. If the best course of action isn't clear, please talk to your supervisor or manager, call the Integrity Helpline at 855-857-5700, or contact the resources listed in the *Getting Help* section of this *Code*. When in doubt, do the right thing.

*The time is
always right to
do what is right.*

*~Martin Luther
King, Jr.*

Management Commitment and Responsibilities

The Company is committed to living up to high standards of ethical behavior. To oversee the Company's ethics and compliance efforts, the Company has designated a senior executive officer as the Chief Compliance Officer and has established the Business Integrity Advisory Committee, comprising senior officers and an outside member, to enhance the Company's business integrity efforts. The Company has also created Business Integrity and Compliance, which is responsible for implementing the *Code of Business Conduct* through training, communication and administration of the Integrity Helpline.

Managers and supervisors have a responsibility to create and sustain, in both actions and words, a work environment in which employees, consultants and contract workers know that ethical and legal behavior is required of them. Managers and supervisors must be diligent in looking for indications that unethical or illegal conduct has occurred, seek guidance from the Company provided resources, and take appropriate and consistent action to address any situations that are in conflict with the law or the *Code of Business Conduct*.

Accountability and Responsibility continued

We will make accountability and responsibility for ethical conduct a strategic business commitment.

Q: How are my obligations to meeting financial or business goals and my obligations to the *Code of Business Conduct* viewed by the Company?

A: The two are completely compatible...and in fact directly connected. Doing the right things for the right reasons is always good business. The Company's interests are never served by unlawful or unethical business practices.

Corporate Governance and Internal Controls

We believe that effective corporate governance begins with a strong Board of Directors, able to make independent decisions on behalf of all our stakeholders. We will take all appropriate steps to support such a Board. We have an independent outside auditor, as well as a system of internal controls and reporting mechanisms, to protect the assets and operations of the Company and to provide management and the Board with accurate, honest and timely information. Employees are required to live up to the letter and spirit of our system of internal controls, and to cooperate fully with any audit or investigation.

Accountability and Responsibility

We make many decisions every day at all levels of the organization. This is how we move forward and accomplish our business goals. We as individuals are accountable for making good decisions and for the outcomes those decisions produce. Our *Code of Business Conduct* provides guidance for our decisions.

Our fellow employees look to us for leadership and to see if we take responsibility for our own actions. Each of us must act as a leader by taking responsibility for everything we do.

"Honesty and integrity are very important in dealing with our customers. This was demonstrated by two store employees while waiting on customers. One employee suddenly noticed an envelope full of money on top of the counter. It was \$1,060! Management was notified and the money was immediately secured in a safe. Determined to find the owner, the video tape was reviewed to identify the customer who had left the money. After claiming his money the customer later showed his thanks to the two employees with gift certificates for dinner at a nice restaurant. It is this type of behavior that makes everyone proud to work at Speedway, and sets the example of elite customer service."

A Speedway Human Resources Representative

Each of us must abide by our *Code of Business Conduct*. Violators of the *Code* are subject to prompt and appropriate discipline, up to and including dismissal from the Company and prosecution under the law. Any waiver of the provisions of this *Code* requires the personal review and approval of the President of the Company. Any waiver of the provisions of this *Code* for the benefit of senior financial officers, executive officers or members of the Board of the Company requires the personal review and approval of the Audit Committee or Board of Directors and must be promptly disclosed to shareholders. Waivers may be granted only as permitted by law and in extraordinary circumstances.

A Responsibility to Ourselves

We believe honesty and integrity benefit the individual, as well as the Company.

Each of us wants to be known as a person of integrity. When we lose that reputation—with others or ourselves—it's painful. It can hurt our careers, our health, and our relationships. If we engage in unethical conduct, we may have personal, legal liability or responsibility for any resulting damages or violations of law.

Probably the worst thing to do is to cover up a problem. Attempts to conceal even a minor violation by altering or destroying Company records can result in civil and criminal penalties that are worse than the penalty for the original offense.

The goal of our Company is to reinforce a positive work environment where doing the right thing, thereby protecting yourself from the negative consequences of illegal behavior, is the easy thing to do.

Reporting Non-compliance

If you have any knowledge of a violation of our *Code of Business Conduct*, you have an obligation to report it to your supervisor or manager or to another appropriate person. The Company will not allow retaliation for reporting concerns in good faith. Retaliation for good faith reporting is itself a violation of this *Code*. Again, refer to the *Getting Help* section of this *Code* for more information on how you can report non-compliance situations.

Q: Sometimes it seems to me that safety takes a back seat to productivity. What should I do?

A: We are committed to putting safety and health first. Discuss your perceptions with your manager or your manager's manager or call the Integrity Helpline or contact any of the resources listed in the *Getting Help* section. We all share the responsibility for safety, and the responsibility to speak up without any fear of retaliation even when it's not popular.



Responsibility to One Another

We will treat all employees with dignity, respect and fairness.

Q: Sometimes I feel like my supervisor is making fun of me and it makes me feel bad. It isn't sexual or violent but it is very uncomfortable. What can I do?

A: Our values and treatment of employees go beyond legal issues and are based on respect and dignity of every employee. Discuss the matter with your supervisor or with his or her supervisor or manager, call the Integrity Helpline, or contact the resources listed in the *Getting Help* section for advice or guidance.

Dignity, Respect and Fairness

You and your ideas create value and success for the Company. We must value and respect the unique character and contribution of each employee. Treating each other with dignity, respect and fairness is the foundation of good business conduct. The Company respects the human, cultural and legal rights of individuals and communities and promotes, within its sphere of influence and legitimate business role, the goals and principles of the United Nations Universal Declaration of Human Rights.

Diversity

We promote diversity within our workforce. Diversity of people and ideas will provide the Company with a business advantage. We believe diverse companies compete more successfully in today's world economy.

Discrimination

Discriminating against any employee or person with whom we do business on the basis of age, race, color, religion, sex, disability, national origin, ethnic group, sexual orientation, covered veteran or other legally protected status is not permitted.

Workplace Harassment and Violence

Harassment and violence in the workplace are strictly prohibited and will not be tolerated. Conduct that creates an unwelcome or uncomfortable situation or hostile work environment, such as unwelcome advances or requests for sexual favors, inappropriate comments, jokes, intimidation, bullying, or physical contact, may be forms of workplace harassment. Employees should avoid any actions or words that might be interpreted by another as harassment or a threat of violence.

Safety and Health

We are committed to providing a safe and healthy workplace. Each of us is responsible for observing all of the safety and health rules that apply to our jobs. We are all responsible for taking precautions to protect ourselves and our fellow employees from an accident, injury or unsafe condition. Additionally, each of us must promptly report unsafe or unhealthy conditions and take steps to correct those conditions immediately.

Alcohol/Substance Abuse

We are committed to a workplace free of substance abuse. We jeopardize ourselves and each other if we report to work impaired by the influence of alcohol or drugs. The use, possession or distribution of unauthorized drugs or alcohol on Company time or on Company premises is prohibited. Employees are encouraged to seek treatment for alcohol and substance abuse problems.

Responsibility to the Public

We will take responsibility for our actions.

Customers

Each of us has important responsibilities to our customers. While some of us are closer to customers than others, we all should think in terms of how our customers might feel about how we conduct business and we should act accordingly.

Customers depend on us to be true to our word. Nothing undermines our reputation faster than misrepresenting ourselves, or engaging in manipulation, concealment, abuse of privileged information or any other unfair-dealing practice. Simply put, those who do business with us deserve honest, accurate and clear communication. They also deserve and need to know that we keep our promises. Equally, customers and suppliers need to be aware of our standards regarding ethics and business integrity and we should encourage them to help us uphold such standards.

Environment

Environmental protection is the right thing to do, and part of our business strategy. We will work to reduce and prevent waste, emissions and releases in all of our operations. We will safely use, handle, transport and dispose of all raw materials, products and wastes. And we'll help others understand their environmental responsibilities when using our products. We strive for continuous improvement of our environmental performance, in partnership with government agencies, contractors and communities. Our environmental commitment is a responsibility shared by everyone. No one can assume it is the job of someone else.

Communities

We are privileged to do business in many communities. As citizens of those communities, we must always act responsibly. This means conducting our operations safely, and being prepared for emergencies that may occur. We give back to our communities by actively supporting and participating in hundreds of civic and charitable causes.

External Communications

Communications to those outside our Company require a unique understanding of legal and media issues. To ensure professional handling, refer requests for information by the media or the public to Public Affairs and legal requests to the Law Organization.

Q: We had a small spill recently that we took care of quickly...but I'm pretty sure nobody notified management. No one wants the paperwork, the aggravation or the possible expense of a government fine. What's our stance on this?

A: We will obey the law. We are responsible for being good environmental citizens—and this means not only prompt, effective clean-up but also accurate and honest reporting of any problems. Any event that threatens the environment or our reputation must be reported to your management.

Responsibility to Shareholders

We will respect and protect the interests of those who invest in our future.



Protecting Company Assets

We are each entrusted with Company assets and honoring that trust is a basic responsibility to each other and to our Company. We must protect Company assets from loss, damage, misuse or theft. This includes our time when compensated by the Company. Use of our Company assets for purposes other than Company business requires prior authorization by appropriate levels of management.

Protecting Our Good Name

It takes each of us—one person at a time and one action at a time—to protect our name and our reputation. Part of protecting our name and reputation is living up to the standards found in this *Code of Business Conduct*. We must be careful to only use our name and logo for authorized Company business and never in connection with personal activities or personal communication.

Business Records and Communications

When we create or maintain reports, records and communications, we are also responsible for the integrity of those records. We must not make false or misleading entries in Company books or records. All financial reports, sales reports, expense reports, time sheets, production records and other similar documents must be accurate. If you are uncertain of the validity of an entry or report, raise your concern to the best source for correcting it. Never allow yourself to be part of a chain of incorrect information.

Whenever you write a memo, leave a voice mail or send an e-mail, you create a record. These records are not private. Communicate in a way that you would be comfortable if you read what you said or wrote later in a newspaper or court of law.

We will dispose of documents in accordance with our records retention policy. We will never destroy or alter any documents or records in response to any investigation, anticipated investigation or lawful request.

Confidential Information

Protecting confidential information, one of our most valuable assets, is part of our obligation to our Company. Confidential information includes proprietary technical information, business plans, status of operations and equipment, detailed financial data, and all other non-public business information that would be of use to competitors or harmful to the Company if made public. We must not disclose confidential information to anyone outside the Company in a manner that could benefit our competitors or harm the Company unless disclosure is authorized or legally mandated.

Q: Sometimes the message boards and social media sites on the Internet are full of misinformation about the Company. Isn't it my responsibility to correct it with my own post?

A: No. You should let someone in Public Affairs know about erroneous information circulating in public. No unauthorized employee may post Company information or a Company position on behalf of the Company on the Internet or social media sites such as Twitter and Facebook.

In many instances, we require written confidentiality agreements with the party to whom we will be disclosing such information. If you have questions about the confidentiality of information or the need for a confidentiality agreement, seek advice from the Law Organization. Avoid discussion of confidential information in public places and with individuals who have no need to have the information. We must protect our information by appropriate use of reasonable security measures.

Protecting the confidential information of our employees and customers is also of the greatest importance. Personal employee information should be limited to Company personnel who have appropriate authorization and a need to know such information. Anyone who handles such information must take great care to preserve such confidentiality. Our responsibility to preserve confidential information continues even after our employment with the Company ends. Additionally, we should never try to persuade others to violate obligations of confidentiality they might have to present or former employers.

Inside Information

Stocks and other securities are publicly traded and their market prices are based on public knowledge of our Company. Investors could gain an unfair advantage through material inside, non-public information that might affect their decisions to buy or sell securities. Trading on, or “tipping” others about material, non-public information about the Company or the companies we do business with, could result in serious civil and criminal penalties for individuals and the Company. Insider trading is unethical and illegal, and will be dealt with decisively. Always seek advice from the Law Organization if you are unsure about the legality of a transaction.

Conflicts of Interest and Corporate Opportunities

Business decisions and actions on behalf of our Company must never be influenced by personal considerations or personal relationships. We must never use Company property, information or our position to create personal or family benefit. A conflict of interest may exist when family members or close personal friends are involved in business relationships with us, either inside or outside the Company, or when we or a family member have a direct or indirect personal or financial interest in any business issue that is under consideration. A conflict may also exist when an outside interest interferes with our ability to do our jobs to the satisfaction of the Company. We should never attempt to become involved in a business that may compete with the Company nor attempt to acquire an interest in property or other assets in which our Company might reasonably be expected to have an interest, without first offering the opportunity to the Company.

Q: It seems that newspaper stories often contain more information about a plant upset or unit failure than we are provided in the Company. It's almost as if someone at the Company shared the information. If so, isn't that inappropriate?

A: Our ethics policy cautions employees to be sensitive to the danger of releasing proprietary information – and potentially damaging information – to the press. Because of the potential for damage or misrepresentation, the Company's Public Affairs component is explicitly charged with handling media contacts. Not only does this policy help protect our reputation, it also helps the Company's competitive position. Experience shows most “press leaks” are rarely intentional. Employees need to understand that casual and careless talk can lead to releasing sensitive information that can damage the Company and its reputation.

Responsibility to Shareholders continued

We will respect and protect the interests of those who invest in our future.

Q: I often know about the financial results of the Company before most other people inside the Company. If we beat forecasts, this seems like the perfect time to buy our stock. Right?

A: Wrong. If your information has not yet been shared with the public, and it is important enough that investors might change their perceptions of the Company, then you can't buy or sell. In a sensitive position such as yours, it's wise to check with the Law Organization to determine a safe window for investment actions.

Q: Suppose I am offered a gift that I feel I should not take, but it would be embarrassing to refuse...what should I do?

A: This is why the gift guidelines call for good judgment and disclosure – each situation can be so different. You should always feel free to decline a gift and return it with a thank you note. If it is an inappropriate gift, inform your supervisor and discuss the next steps.

You must promptly disclose all potential conflicts of interest, including those where even the appearance of a conflict of interest may exist, to your supervisor, or Business Integrity and Compliance, or contact the resources listed in the *Getting Help* section. The Company also periodically requires designated employees to certify, with any disclosures noted, that they are not involved in any potential conflict situations. Disclosure and discussion are the best ways to protect against and deal with conflicts of interest.

Gifts and Entertainment

The exchange of gifts, meals and entertainment is a common practice in business, and can help us build better relationships with customers, vendors and other business allies. Although local and industry customs about gifts and entertainment vary, one principle is clear and common: an employee should not accept any gift, favor or entertainment if doing so will obligate, appear to obligate or is intended to obligate or unduly influence the employee. Think about what other employees might think about your actions and what kind of example you would be setting.

The types of gifts and entertainment that are appropriate to give or receive as a Company employee depend on many factors. If the gift, meal or entertainment in question is lavish or frequent, or unusual for the receiver's job or community, it is probably not acceptable. If you're in the middle of negotiations or bid evaluations, extra care is merited. Never request or solicit personal gifts, favors, entertainment or services. Never offer or accept gifts of cash or securities. This section of the *Code* is not intended to conflict with Company compensation programs or Company authorized distributions to employees or third parties.

Further information can be found in the Company's Guidelines for Meals, Gifts and Entertainment. An electronic Gift and Entertainment Reporting System has been implemented for use when supervisory approval is required.

Travel

Business travel requires each of us to know and follow current travel and business expense reporting policies of the Company. Free transportation from vendors, suppliers, customers or those who wish to be vendors, suppliers or customers generally requires prior approval by an employee's supervisor.

Because of the many factors involved, every scenario cannot be itemized in this *Code of Business Conduct*. When in doubt, seek the guidance of your supervisor, call the Integrity Helpline, or contact any of the resources listed in the *Getting Help* section.

Responsibility to Our Business Partners

We see our business partners as equals in the quest for high business conduct standards.

External Business Practices

We will deal honestly with our suppliers and contractors. We believe in doing business with those who embrace and demonstrate high standards of business conduct. We will not look favorably on suppliers that have a history of violating the law, including environmental, employment and safety laws.

External business partners that knowingly seek to have Company employees violate our *Code of Business Conduct* will be subject to appropriate sanctions, including the possible cancellation of all current and future contracts.



“Our Terminal recently hosted representatives from the tank manufacturer, another oil company and an engineering services company to observe the operation of our new oil water separator. We have adopted the design of this particular oil water separator as the Company’s standard for future installations. The attendees were interested in the options which might make their own installations safer and more environmentally sound. All attendees learned a lot during the visit, including the design engineer of the tank manufacturer, who learned several ways to make their product better. Educating our suppliers and business partners, and even our competitors, regarding safety and environmental best practices is representative of how we have grown the culture of Responsible Care® within our organization.”

A Terminal Manager

*One falsehood
spoils a thousand
truths.*

~African Proverb

Internal Business Partners

Each of us acts as a business partner to every other person at our Company. We will honor that relationship through truthful and candid communication. We will communicate both good news and bad news in timely and candid ways. This includes communication up and down the organization.

We will respect the ideas of others and respect their courage to express those ideas. We will win as a team, but always understand the importance of each team member. We will only make realistic promises to each other and we will keep those promises.

Responsibility to Our Business Partners continued

We see our business partners as equals in the quest for high business conduct standards.



*A “No” uttered
from deepest
conviction is
better and greater
than a “Yes”
merely uttered
to please, or what
is worse, to avoid
trouble.*

~ Mahatma Gandhi

Marketing Practices

We will compete for business aggressively and honestly. We will not misrepresent our products, services or prices. We will not make false or misleading claims about our products or services, nor will we do so about the products and services of our competitors.

Purchasing Practices

Employees must base all purchasing decisions on the value realized by our Company and alignment with our business standards and goals. Important considerations in purchasing decisions include competitive bidding, partnering arrangements, incentive-based contracts, quality verification, confirming the legal and financial condition of the potential supplier, and avoiding personal conflicts of interest such as dealing with family members or friends. We must properly document any purchasing arrangement or agreement.

Responsibility to Governments and the Law

We will comply with legal and regulatory standards.

The Letter and Spirit

Legal standards of conduct act as our minimum acceptable level of conduct. Obviously we must obey the law, but we strive for a higher standard. The *spirit* of our *Code of Business Conduct* reaches out to all of us to act in special ways.

Knowing when something just doesn't feel right is often our only clue. Our Company cannot reproduce and distribute every law or rule that exists everywhere we do business. While this *Code of Business Conduct* is framed by our experience with U.S. law, the principle of doing the right thing and following applicable law applies to every community in which we do business. We must all grasp the intent and the *spirit* of our *Code of Business Conduct* and seek advice and counsel whenever we are uncertain about our choices of action.

Antitrust and Fair Competition

We will compete vigorously and comply with all applicable antitrust and fair competition laws. These laws generally prohibit agreements that tend to restrict competition (such as agreements between competitors as to their pricing, bidding, production, supply and customer practices), as well as a variety of forms of unfair conduct that may tend to create a monopoly. Because antitrust and fair competition laws are far-reaching and often complicated, you should seek legal advice before taking any action that might be questioned under such laws.

Anti-corruption Laws

We will comply with all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act or "FCPA," wherever we do business. These laws generally forbid bribes to government officials or their representatives. While the U.S., like nearly all nations, outlaws bribing its own government officials, the FCPA also makes it a crime to bribe "foreign governmental officials," a term that is broadly defined but may include promising, offering or delivering to any foreign or domestic government employee or official any gift, favor or other gratuity that would be illegal. In recent years, many countries have passed similar legislation. You must consult with the Law Organization as soon as possible if you are concerned that there is or might be a potential violation of applicable anti-corruption laws, including the FCPA. The FCPA also requires the Company to keep books, records and accounts which, in reasonable detail, accurately and fairly reflect its foreign and domestic transactions. You must consult with the Accounting Organization as soon as possible if you are concerned that the Company's books, records and accounts do not accurately reflect the Company's transactions.

The Company requires comprehensive FCPA and anti-corruption compliance training for all employees whose job responsibilities involve FCPA and anti-corruption compliance.



*It takes less time
to do a thing right,
than it does to
explain why you
did it wrong.*

*~Henry Wadsworth
Longfellow*

Responsibility to Governments and the Law continued

We will comply with legal and regulatory standards.



The reputation of a thousand years may be determined by the conduct of one hour.

~Japanese Proverb

Political Activities

Many governments have laws prohibiting or regulating corporate contributions to political parties, campaigns or candidates in the form of cash or the use of Company facilities, aircraft, automobiles, computers, mail services or personnel. Certain contributions may be prohibited by Company Policy, even if otherwise permitted by the applicable law. Any proposed corporate contribution should be arranged through Governmental Affairs.

Lobbying activity on behalf of the interests of our Company is permissible, but highly regulated by law. Employees who communicate with government officials and employees on issues that affect our Company should contact the Law Organization to ensure that such activities fully comply with the law and that our Company's lobbying efforts are coordinated.

We respect the right of each of our employees to participate in the political process and to engage in political activities of his or her choosing. While involved in their personal civic and political affairs, however, employees must at all times make clear that their views and actions are their own, and not those of the Company. Employees may not use Company resources to support their choice of political parties, causes or candidates.

Getting Help

We have a process that supports employees in their search for always doing the right things for the right reasons.

Questions

If you have questions about policies, practices or our *Code of Business Conduct*, talk to your immediate supervisor or manager. If for some reason you are uncomfortable speaking with your immediate supervisor, please talk to another member of management or other appropriate personnel discussed in this *Code of Business Conduct*. Don't put it off. Time may be of the essence in avoiding a bigger problem.

Other Resources

You may also seek advice and counsel from Business Integrity and Compliance, the Company's functional departments with responsibility for Human Resources, Safety, Security, Finance, Internal Auditing and Law, or call the numbers listed on the *Getting Help* card found at the end of this *Code of Business Conduct*.

If you are aware of any ethical issue or irregularity, don't attempt to handle an investigation on your own. Ask for help from the functional departments listed above. Who you talk to is not as important as you talking to someone. Be confident that we will stand behind our *Code of Business Conduct* and stand behind those who raise issues in good faith.

Integrity Helpline

The Integrity Helpline is an additional resource for anonymous advice or discussion on workplace behavior and ethics. You can reach it in many ways (see the *Getting Help* card found at the end of this *Code of Business Conduct* book). The Integrity Helpline phone number is:

855-857-5700 (Callers may call anonymously. Caller ID is disabled on this line.)

If requested by the employee source, the Company will treat the employee's identity and the alleged illegal or unethical conduct as confidential information, and will disclose the identity of such source only as necessary to comply with legal requirements and investigate the reported conduct. Those informed of the employee's identity shall be made aware of the need for confidentiality.

If you call anonymously, you will be provided a number to use in identifying your inquiry. The group of professionals who answer your call will work with you to get the information the Company needs to address your concern.

Q: How do I know my issue will be taken seriously?

A: Misconduct hurts all of us. The people at the reporting numbers want to prevent unethical or illegal conduct as much as you do. All issues received are carefully investigated. Naturally, the more information you can provide, the more effective any investigation will be.

Questions? Concerns?

**Talk to your
management or call
the Integrity Helpline
at 855-857-5700**

Getting Help continued

We have a process that supports employees in their search for always doing the right things for the right reasons.



No legacy is so rich as honesty.

~ William Shakespeare

Reporting Illegal or Unethical Conduct

The Integrity Helpline also enables employees, vendors and contractors to report unethical or illegal acts, or suspicions of unethical or illegal acts. The Company will not allow retaliation against any individual who reports in good faith concerns about compliance with the law, compliance with this *Code* or other ethical concerns. Business Integrity and Compliance coordinates the resolution of all calls. This may include the involvement of Internal Auditing, the Law Organization, Human Resources and departmental management as necessary. The Helpline number, mailing and email addresses currently in operation can be found on the *Getting Help* card at the end of this *Code of Business Conduct* book.

If an employee becomes aware of any issue concerning the financial integrity of the Company, including questionable accounting or auditing matters, he or she must bring it to the attention of management or Business Integrity and Compliance. If requested by the employee, Business Integrity and Compliance will arrange for the confidential, anonymous submission to the Audit Committee of concerns regarding questionable accounting or auditing matters, consistent with applicable law.

Policies and Guidelines

Our *Code of Business Conduct* provides an overview of many of the business conduct issues we face. Additional information about our policies and guidelines may be accessed through the Company's internal website.

Our Values

No single document can list and explain every question or business practice. Remember the words found throughout our *Code of Business Conduct* – *trust, respect, dignity* and *honesty*. These values form the foundation for good decisions.



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Getting Help

Reporting Unethical Conduct



Integrity Helpline



If you suspect an illegal or unethical act has been committed, report it to the Integrity Helpline. Such concerns may be reported confidentially and anonymously. The professionals who answer the Integrity Helpline will work with you to get the information the Company needs to investigate or address your concern. Every reasonable effort will be used to keep all such reports confidential and anonymous. The Company will not allow retaliation for reporting concerns in good faith.

If you have questions about policies, practices or our *Code of Business Conduct*, talk to your supervisor or manager, or contact Business Integrity and Compliance.

**Integrity Helpline: 855-857-5700 or
Integrity@MarathonPetroleum.com**

Write: Business Integrity and Compliance
539 S. Main St.
Findlay, OH 45840

or

Speedway
Director, Safety & Security
P.O. Box 2828
Springfield, OH 45501-2828