## SUNDCO LP

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# 2021

Corporate Responsibility Report

### **Table of Contents**

Introduction	2
About This Report	2
A Message From Our CEO	3
About Sunoco	4
Business Overview: Wholesale Distribution	6
Business Overview: Midstream Services	10
Financial Performance Summary	12
Our Primary Mission	13
Reliability	14
Health, Environmental	
& Safety Management	15
HES Policies, Procedures & Systems	17
Comprehensive HES Training	20
HES Performance Bonus Program	22
HES Incident Rates	23
Social Responsibility	24
Charitable Giving & Employee Volunteerism	25
Community Impact	30
Stakeholder Relations	30
Disciplined Corporate Governance	32
The SUN Team	33
Employee Training & Development	34
Cybersecurity	36
Board of Directors	37
Ethical Governance Practices	37



1

# **About This Report**

Welcome to Sunoco's 2021 Corporate Responsibility Report. We are excited to build upon our inaugural report in 2020 and provide an overview of our operational excellence as a leading fuel distributor and progress as a strategically growing midstream company. The scope of this report reflects our corporate responsibility efforts from January 1, 2021 to December 31, 2021.

### Sunoco: A Dependable Brand with a Focus on the Future

At Sunoco, we fuel the people who keep our world moving. As the nation's largest independent fuel distributor, we continue to leverage our expertise and grow our distribution platform. We do this by focusing on three core areas which are highlighted throughout our Corporate Responsibility Report:

- 1. safety and environmental stewardship,
- 2. commitment to social responsibility and
- 3. ethical corporate governance.

### **A Dependable Brand**

Sunoco's lineage traces back over a century to Pennsylvania in 1886. Since then, the company has evolved, developing a strong network of independent distributors, operators and commercial customers in more than 30 states, through which Sunoco distributed approximately 8 billion gallons of fuel in 2021. The heart of our company is our 2,225 employees across the country. Our family-friendly culture is one of the driving forces in our company's success. I especially appreciate our dedicated employees who worked tirelessly throughout the global COVID-19 pandemic to provide the essential fuel that consumers needed.

### **Future Focused**

We continually seek ways to grow, innovate and support the needs of the public. 2021 was another successful year, as we continued to strategically grow and diversify our business. One of our main points of focus was to significantly expand our midstream business. Our geographically diverse and reliable distribution network creates the necessary platform to provide the fuel that powers our economy, including both traditional



and low carbon/nontraditional fuels. With our strategic assets and thoughtful innovation, we believe Sunoco is well positioned to adapt to meet our nation's ever-evolving needs now and into the future. We're proud of the last 130 years and we're even more excited about our future. We hope our second annual Corporate Responsibility Report will provide further insight into Sunoco. We look forward to continuing to provide a reliable service to our customers and the public, serving the needs of the communities in which we live and operate.

Joe Kim

Joe Kim President and Chief Executive Officer

# About Sunoco

### The Nation's Largest Independent Fuel Distributor with a Growing Energy Infrastructure Platform

Our business is centered around the safe delivery and storage of fuel and petroleum products across the nation – essential products necessary for modern life. As the largest independent fuel distributor in the United States, combined with our growing midstream infrastructure, our 2,225 employees offer unparalleled expertise in the fuel delivery space. Sunoco distributed approximately 8 billion gallons of fuel in 2021. Our core operations include the distribution of motor fuel to approximately 10,000 convenience stores, independent dealers, commercial customers and distributors across nearly 40 states, as well as a quickly growing midstream business which includes 25 refined products terminals. In 2021, we strategically invested \$39 million in maintenance capital to ensure the safe operations of our assets.

Below is an overview of our two core pillars of business: Fuel Distribution & Midstream Services



### **Business Overview:** Wholesale Distribution

### **Reliable Delivery of Quality Fuel**

Sunoco opened its first gas station in Ardmore, Pennsylvania, in 1920. Today, over 100 years later, we are the largest independent fuel distributor in the country. In 2021, we distributed approximately 8 billion gallons of fuel across approximately 40 states and 3.5 billion gallons were transported via our expansive company fleet.

We offer more than a dozen high-quality fuel options for our customers. Beyond just the motoring public, we also provide fuel, lubricants and specialty services to industrial, transportation, agricultural and energy customers across the nation. We purchase motor fuel primarily from independent refiners and major oil companies and efficiently distribute it throughout the East Coast, Midwest, South Central and Southeast regions of the United States, as well as Hawaii. In 2021, we distributed fuel to more than 7,300 dealer, distributor and commission agent customers and over 2,500 commercial customers.

Starting in 2020, we began a multiyear investment to fully upgrade our tractor fleet. The new tractors include upgraded safety features and improved fuel efficiency. On average the new tractors have a 2.5 percent miles per gallon improvement. In 2021 alone, we invested approximately \$6 million in the fleet upgrade and \$200,000 in state-of-the-art technology upgrades, including collision-avoidance systems. These additional investments demonstrate our commitment to safely delivering fuel throughout the country.



### **Motorsports Racing Fuel**

Our dedication to high-quality fuel has made us leaders in the motorsports industry. Since 1966, we have provided fuel for motorsports racing and have sponsored and supported the industry in a variety of ways. Today, Sunoco is the world's largest manufacturer of racing fuel. In 2021, we supplied fuel for 135 total racing events and 39 different track venues.



In 2004, we became the official fuel provider for NASCAR, a relationship we are proud of and continue today. We dispensed over 8.5 million gallons of Sunoco Racing Fuel over the 18-year span of our relationship with NASCAR, which has included over 2,100 events. In 2021, we supplied fuel to 93 NASCAR Top 3 Series events.

### **Quality Fuel**

For more than 100 years, Sunoco has been committed to providing high-quality fuel. Fuel quality is just one of the reasons why people continue to choose Sunoco. Sunoco is relentless in its commitment to supplying high quality fuel, whether the fuel is dispensed from the four fuel grades at its fuel stations, or whether it's the race fuel that powers the fastest racing machines in the world.

We continuously adapt to meet consumer demand by introducing new and improved fuel options. To demonstrate our commitment to innovation, highlighted below are just a few fuels unique to Sunoco.



#### Sunoco Green E15

In 2021, we concluded our 18th season as the Official Fuel of NASCAR. Sunoco Green E15, made exclusively for NASCAR racing vehicles, is a blend using 15 percent ethanol. Ethanol is a renewable fuel that, when blended with gasoline, helps lower greenhouse gas emissions. In 2021, Sunoco produced close to 400,000 gallons of E15 exclusively for NASCAR.



### Sunoco E85-R

Another ethanol fuel with growing interest is E85-R, a racing fuel containing 85 percent ethanol. In the last two years, production volume has more than doubled. Sunoco has provided ethanol-blended fuels since the mid-1990s, and we are proud of how our ethanol blending business has evolved over time.



#### Sunoco Ultra 94

Our commitment to innovation continues with the reintroduction of our new and improved Sunoco Ultra 94. Ultra 94 meets both the demands of high-performance drivers and the specifications of the Top Tier Detergent Gasoline Program. Its enhanced gasoline detergency helps keep engines clean so they can meet today's strict vehicle emissions requirements. Ultra 94 has the same detergent level as our NASCAR fuel and helps cars run cleaner, longer and more efficiently. It is the highest octane premium fuel blend available on the market, and it can only be found at Sunoco.



### Sunoco Optima

Sunoco Optima was developed as a highly stable fuel to meet the demands of first responders. It is an unleaded fuel blended from highly-refined hydrocarbon blendstocks. It does not contain ethanol or MTBE and is oxygenate-free. Optima has excellent storage characteristics, making it ideal for storing vehicles and gasolinepowered equipment, especially those requiring an exceptionally stable unleaded fuel.



### **Retail Services**

For more than a century, we have taken great pride in our commitment to supporting our customers, many of whom are independent operators in the retail fuel space. Because we also operate and have operated retail outlets for many decades, we truly understand and appreciate the needs of independent retail business operators. In 2021, we operated 78 retail convenience store locations in markets in Hawaii and along the New Jersey Turnpike. Our non-fuel products and services are designed with the success of our customers in mind, and we are constantly innovating to provide updated food and fuel retail services and help drive customer profits and consumer loyalty.

### **Weis Markets**

At Sunoco, we strive to be the partner of choice for our customers. In 2021, we were excited to become the official preferred fuel redemption partner of Weis Markets. With over



200 locations in Delaware, Maryland, New Jersey, New York, Pennsylvania, Virginia and West Virginia, Weis Market customers can earn points by shopping and then redeem points for discounts on fuel at participating Sunoco locations. For every 100 points, consumers save

10 cents per gallon. Our sites enrolled in the Weis program are seeing great success, with some experiencing more than 10,000 incremental gallons per month flowing through the program.

### **Sunoco Go Rewards**

In 2021, we rolled out Sunoco Go Rewards, our new loyalty program. First introduced in late 2020, the program offers consumers a way to save at the pump. Fuel savings are a key differentiator and a magnet for attracting new customers, as well as an incentive for existing customers to visit more often and spend more.



The Sunoco Go Rewards program is a mobile-based loyalty program that rewards members when they purchase fuel at participating Sunoco locations. Consumers who download the Sunoco App are automatically enrolled into Go Rewards and save money when they use their app to pay for fuel. When consumers download and register for the first time, they receive three cents per gallon savings each time they fuel through the end of the next month. If members want to continue saving, they only need to fill up twice every calendar month.

### **New Centennial Image**

In celebration of Sunoco's 100th anniversary as a trusted fuel company, we invested in modernizing and upgrading our iconic brand. Throughout 2021, we continued to roll out our new and improved image across our service areas. Part of keeping the Sunoco brand growing is ensuring it stays relevant to our consumers. Our new Sunoco image builds on our powerful brand identity and incorporates well-lit LED



lighting strips around the perimeter of the canopy. Lighting plays an important part in the design's overall impact, as well as creating a safe environment for customers. Still distinctly Sunoco, the blue canopy fascia, Sunoco logo and yellow arrows provide a more contemporary design and better showcase our advanced fuel quality. Throughout the rollout, our teams worked closely to coordinate maintenance activities to minimize site impact and maximize efficient capital expenditures.



#### **Aloha Petroleum**

Aloha Petroleum, a subsidiary of Sunoco, is one of the largest gasoline marketers and convenience store operators in Hawaii.



Aloha employs more than 600 Hawaii residents and markets approximately 100 Aloha, Mahalo, and Shell branded fueling stations and 56 Aloha Island Marts, four Menehune Food Marts, three

Subways and five Dunkin' Donuts restaurants throughout Hawaii. Aloha's largest customer is Costco. In the years ahead, we expect to reach a major milestone of reliably serving one billion gallons of fuel to Costco. Aloha Petroleum was recognized as a finalist in Hawaii's Best, Honolulu Star Advertiser

### FINALIST



2021 Hawaii's Best Gas Station

## Business Overview: Midstream Services



### A Milestone Year with Strategic Growth from our Integrated Midstream Platform

Terminals are a vital component of our nation's supply chain and provide critical logistics needed to transfer bulk liquids, including crude oil, petrochemicals, and food-grade products, from one mode of transportation to another, whether from ship to truck, from ship to barge or from pipeline to rail. They are a critical part of the fuel distribution value chain.

In 2021, we announced the acquisition of nine refined products terminals - eight refined products terminals from NuStar Energy and one refined products terminal from Cato Incorporated - for a combined price of \$255.5 million. The nine refined products terminals have a total storage capacity of 15.5 million barrels. These acquisitions significantly expanded our midstream business and enhanced our fuel distribution platform. All of our acquisitions are considered through an energy transition lens, with a focus on solidifying our longterm sustainability.

In addition to growth from our acquisitions, we completed the construction of the Brownsville refined products terminal in Brownsville, Texas. This greenfield construction project offers 560,000 barrels of storage, provides flexibility to our existing fuel distribution business in South Texas and strategically positions Sunoco to sell into the growing fuels export market in Mexico. The total investment for the Brownsville Terminal was approximately \$55 million.



Refined Products Terminal, Brownsville

For Sunoco, owning these types of midstream assets positions us to better supply our customers across a wide geographic range of markets. Meanwhile, the fuel distribution business helps keep fuel flowing through our terminals, providing a platform for growth. Together, these synergistic assets prepare Sunoco to support energy transition and meet growing domestic and international demand.

By the end of 2021, we owned and operated a total of 25 product terminals and 2 transmix facilities with approximately 18 million barrels of storage capacity – an 800 percent increase in total storage since 2018. Sunoco's growing midstream business employs close to 300 people.

We invested \$3.2 million on midstream maintenance in 2021, which includes several efficiency upgrades. For example, at our Jacksonville Terminal, we installed a new, faster-rate premium pump which improves efficiency. We also prioritized the installation of LED lighting across our operations. We're proud of our growth, and we're excited to continue to expand this important pillar of our business.



### Transmix

When multiple fuel products are distributed through a common pipeline, transportation mixing occurs, resulting in the creation of transmix. Transmix is an unusable mixture of gasoline, diesel and/or jet fuel. It no longer conforms to the required specifications for any single fuel product and is therefore considered waste. Our two transmix facilities reprocess the fuel in an environmentally responsible manner. In 2021 alone, these highly regulated facilities processed approximately 110 million gallons of transmix, up 13 percent since 2020. In addition, we also reclaim petroleum contact water. In 2021, we processed approximately 5.4 million gallons of petroleum contact water and 135,000 gallons of petroleum sludge.



Transmix Facility

### Financial Performance Summary

### **Disciplined & Diversified Growth Strategy**

Sunoco LP (NYSE: SUN) is structured as a master limited partnership (MLP). MLPs have two types of partners: general partners, who manage the MLP and oversee its operations, and limited partners (or common unitholders), who are investors in the MLP. Sunoco's general partner is solely owned by Energy Transfer LP (NYSE: ET).

The durability of our business and history of delivering results helped to support a stable and secure distribution for our unitholders. In 2021, we delivered record EBITDA and distributable cash flow (DCF). We recorded adjusted EBITDA of \$754 million, up 2 percent from 2020. Our DCF, as adjusted, was \$542 million, up 5 percent from 2020. We improved our already strong distribution coverage ratio to 1.6 times, up from 1.5 times in 2020 and 1.3 times in 2019, further demonstrating our commitment to a stable future.

In April 2017, Sunoco announced a new strategic direction focusing on fuel distribution and logistics. Since then, we have outperformed the S&P 500 by over 64 percent while delivering an annualized total unitholder return of 24 percent, becoming a top performing energy MLP. We believe Sunoco's discipline, strategic growth, solid financial foundation, and focus on sustainability will continue to grow value for unitholders.



### **Our Primary Mission**

### Who We Are

Our goal is to not only always be the partner of choice for our customers, but to do so without compromising our commitment to sound and responsible corporate conduct. To ensure that our team members remain committed to our culture and adhere to our principles, we use many tools, including:

- Frequent employee training on a variety of critical topics, including appropriate workplace behavior, anti-corruption practices, HES policies and procedures, and our Code of Business Conduct and Ethics policy.
- Use of an anonymous hotline and internet system for reporting compliance or other concerns, with independent investigatory oversight and enforcement through a dedicated, fully staffed and trained compliance office.
- Use of robust financial reporting controls, independent auditors, and senior management compliance review programs.
- Our Board of Directors and senior leadership team leading by example and setting standards of conduct and expectations throughout every aspect of our business.
   For example, the Board utilizes committees, such as our fully independent Audit Committee or Compensation Committee, as appropriate.



### Reliability



### **Preparing for the Future**

Our mission is to fuel the people who fuel our world. Services provided by Sunoco – from midstream to distribution – play a critical role in our country's supply chain, manufacturing, and domestic security. The products Sunoco is responsible for delivering help supply the fuel Americans demand in a safe and efficient manner, while also supporting domestic energy security.

According to the Fuels Institute, a non-advocacy research organization dedicated to studying transportation energy, the market for electric vehicles continues to grow at an accelerating pace, yet there remains great uncertainty regarding how fast these vehicles will gain significant market share, how many chargers we will need, when and where we

Fuel demand will remain steady through **2050**  will need them, and what kind of chargers will be required in different locations.

Electrification does not come without limitations. And while complex challenges are addressed, global fuel demand continues to increase every year. The

Energy Information Administration forecasts that, even with widespread electric vehicle adoption and fuel efficiency improvements, U.S. liquid transportation fuel demand will remain steady through 2050. We believe that demand for traditional internal combustion vehicles will continue for decades to come. We strive to provide reliable, affordable transportation fuels that improve the standard of living in the communities we serve. And as regulations and consumer demands change, we will continue to adapt – just as we have throughout our long history of innovation.

As stewards of a trusted American brand with a more than 130-year history, we believe we remain well positioned for the future. We see the energy transition as an extraordinary opportunity for us to leverage our



technical expertise, midstream logistics, and distribution capabilities to enable the transportation sector to continue to evolve and for us to demonstrate our long-term sustainability.

# Health, Environmental & Safety Management

## Prioritizing What Matters Most

Our commitment to sound and responsible corporate conduct begins with operating our facilities in a manner that protects our employees, the public and the communities in which we live and operate. This operating principle drives our health, environmental and safety (HES) initiatives.

Safety is at the heart of everything we do – it starts at the top and is woven into every aspect of our operations. Our safety culture, combined with robust safety policies and consistent and effective training methods, contributes to our operational success. We strive to consistently meet or exceed our safety goals, which helps us continually improve our performance. Moreover, we are not satisfied simply by improving our year-to-year performance – we benchmark our performance against our peers and establish goals that represent first quartile performance among our industry.

At Sunoco, we also work to reduce our emissions and minimize our environmental impact. We employ capable environmental professionals to ensure that we adhere to all applicable federal, state and local environmental regulations and integrate sound environmental practices into our daily operations.

Sunoco's HES employees actively participate in a range of industry trade associations, including the American Society of Safety Professionals, as well as community-specific safety and environmental initiatives. This provides our employees the opportunity to share information, participate in legislative and regulatory advocacy, and promote industry research and technology advancements.



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# HES Policies, Procedures & Systems

### The Foundation and Guiding Principles of Our Operations

Supplying energy safely and securely is a top priority. Our comprehensive programs, policies and systems continually drive us toward best-in-class HES compliance and performance. We believe safe and responsible operations start with effective HES policies. Our safety culture supports continuous improvement, and we continually review and update our standards.

One advancement in 2021 was the utilization of Benchmark ESG, a digital software solution for managing operational risk and compliance, sustainability, product stewardship and responsible sourcing. In 2021, eight locations utilized the software, and we look forward to further application in the years ahead.

Our transportation facilities and retail locations maintain operation manuals with comprehensive procedures to ensure our employees conduct activities in a safe and environmentally





responsible manner. The manuals cover a wide range of topics from safe lifting techniques to responding and reporting of releases or spills.

Our midstream operations are complex, highly regulated and require robust HES policies that address a range of topics and regulatory requirements by federal, state and local jurisdictions. Government regulations cover construction of, storage at, and transportation to and from facilities, as well as environmental performance, facility safety, worker safety, facility security and emergency preparedness and response. Sunoco complies with all applicable regulations and collaborates with industry leaders and trade associations, including the International Liquid Terminal Association, to learn about industry-leading standards, guidelines and best practices.

All terminals are subject to regulation by the U.S. Environmental Protection Agency (EPA). The EPA regulates air and water quality around facilities under the Clean Air and Clean Water Acts and the proper handling and disposal of waste. Some of these programs are delegated to and enforced at the state level.

Storage facilities are also subject to Process Safety Management (PSM), a regulation put into motion by the federal Occupational Safety and Health Administration (OSHA), which is designed as a tool to properly manage hazardous chemicals. The goal is to prevent or minimize the consequences of the release of such chemicals. PSM is an additional layer of protection and risk assessment and provides several tools that help ensure safe operations. Sunoco maintains a comprehensive and disciplined PSM system at multiple facility locations. Our practices follow all 14 elements required by OSHA.



In 2021, four Sunoco facilities participated in the Occupational Safety and Health Administration's (OSHA) Voluntary Protection Program (VPP). The VPP recognizes companies who have implemented effective safety and health management systems and maintain injury and illness rates below national Bureau of Labor Statistics averages for their respective industries. Working cooperatively with OSHA, we strive to proactively prevent fatalities, injuries and illnesses through a system focused on hazard prevention and control, worksite analysis, training, management commitment, and worker involvement.

Sunoco operates close to 30 miles of intrastate and interstate pipelines and works closely with Energy Transfer, a premier pipeline company and our General Partner, on our Pipeline Safety Management System. We are committed to continuously improving pipeline safety by implementing bestin- class management practices for how we design, construct, operate and care for our pipeline assets in a way that ensures safety and reliability.

As a responsible operator, in some cases Sunoco goes above and beyond what is legally required at our facilities. For example, our water permits and spill prevention plans, which are regulated by the government, require us to complete quarterly and monthly inspections of our facilities for potential issues (such as leaks, spills or releases). However, several Sunoco facilities conduct daily inspections, or even "inspections each shift," going above and beyond the applicable legal obligation. Another example of Sunoco going above and beyond is our process for installing new underground fuel storage tanks. Each project incorporates enhanced standards including:

- Enhanced vapor recovery components
- Double wall underground storage tanks
- Double wall spill buckets
- Double wall product lines
- Product line leak detection
- Low permeation hoses (when required)
- Drip-less nozzles (when required)
- Containment sumps at dispensers

- Overfill prevention
- · Observation/monitoring wells installed at underground storage tank field
- Fully integrated tank monitoring systems Automatic Tank Gauges
  - Alarms are automatically sent to corporate offices
  - Inventory monitoring and reconciliation control
  - Double wall (annular) underground storage tank monitoring
  - All containment sumps are continuously monitored



### **Racing Safety**

We're proud of our relationship with motorsport racing, which dates back to the early 1960s, and even more proud of our automotive events crew who work tirelessly to ensure the safe delivery of fuel at events throughout the year.

#### **Commitment to Event Safety:**

- We utilize an entirely "closed-loop" fueling system which eliminates vapors being released into the atmosphere.
- The Mobile Fueling Facility is fully contained to eliminate potential product releases to the ground.

- All events operate under Automotive Events Safety and Operational Policies and Procedures.
- We maintain and update Spill Prevention Control and Countermeasures Plans and Emergency Action Plans for each track venue.
- We have daily "at-track" product integrity and quality control checks of our Sunoco Racing Fuel.
- Annual Safety and Operational Procedures Training are mandatory requirements for all Fuel Crew employees.

### Comprehensive HES Training

#### The Pursuit of HES Excellence

Our commitment to safety is at the forefront of everything we do and is evident in our comprehensive HES training methods. There are 14 dedicated Health, Environment and Safety professionals that support Sunoco's operations, as well as numerous others with shared responsibilities.

Our midstream operations require frequent training based on the scope of one's responsibilities and location. We administer 14 mandatory individual training modules that employees complete monthly. Presentations cover a range of topics, including injury and incident reporting, required personal protective equipment, working safely around chemicals and flammable and combustible liquids, and emergency action plans. Additionally, facility-specific trainings are required for operational personnel. Our transportation and retail teams are also trained on HES topics annually.

Training modules are supplemented with safety refresher discussions – often referred to as safety meetings or tailgates – led by managers and supervisors that take place weekly and monthly. These serve as an opportunity to maintain





safety awareness, as well as a venue to openly discuss HES performance metrics and any incidents or "good catches" that may have occurred at our (or a peers') facilities. These meetings help maintain communication and collaboration amongst various departments.

Our transportation division uses a mentorship program for drivers to observe safe operations and discuss areas of risk, such as measuring speed control or identifying instances where vehicles are stopping too quickly. The program includes announced and unannounced ride-along driver observation events, and in 2021 the team performed approximately 1600 observation events. This proactive approach helps prevent incidents and maintain safe conditions in the communities in which we distribute products.

In 2021, our midstream operations team launched a similar initiative called the HES Observation Program. It serves as an opportunity for midstream employees to learn best practices and receive feedback from one another in a positive manner. In 2021, the total number of HES Observations completed by supervisors, managers and HES professionals was 134, further solidifying our commitment to continual improvement. Sunoco conducts an in-house Emergency Response School, now in its 25th year, based in Stroudsburg, Pennsylvania. Students – ranging from managers, supervisors and drivers – attend a three-day course consisting of classroom learning, hands-on training, and simulated emergency scenarios. The biennial safety program helps train company employees, as well as our carriers, on all aspects of emergency response. Our goal is to prevent incidents from ever occurring, but our teams remain vigilant and prepared to respond to a wide array of emergency events. Regardless of the size, severity or cause of an event, each facility has access to trained responders and resources.

## Sunoco strives to partner with community leaders and first responders throughout our areas of operation. A few examples include:

- Our team at the Caddo Mills Terminal partners with the Caddo Mills Fire Department and conducts training drills to remain vigilant in coordinated emergency response procedures.
- In Hawaii, our team members regularly participate with the Kapolei Local Emergency Action Network, an organization focused on preparedness, coordination, and response actions.
- For our Jacksonville Terminal in Florida, Sunoco is represented in the Jacksonville Spillage Control, northeast Florida's first member-owned oil spill prevention, education, and response cooperative, as well as the Northeast Florida Safety Council.

Sunoco regularly participates in Local Emergency Planning Committees (LEPC), when applicable. The purpose of these meetings is to coordinate emergency response plans and strengthen community preparedness.

The four main responsibilities of the LEPC include:

- Preparing emergency plans to protect the public from chemical accidents
- Establishing warning and evacuation procedures for the public
- Collecting information used in the preparation of annual reports about the release of toxic chemicals
- Providing local governments and the public with information about hazardous chemicals and accidental releases in their communities

### HES Performance Bonus Program

### **Incentivizing Safe Performance**

To demonstrate our commitment to safety, Sunoco incentivizes HES performance using a Bonus Program. We're proud that in 2021, close to 97 percent of employees qualified for the program.

### Retail Manager & Midstream Operations Bonus Program

Sunoco recognizes employees who demonstrate a commitment to safety each quarter. Employees must demonstrate the following to qualify:

- Zero preventable equipment or motor vehicle accidents
- Zero preventable environmental releases
- Attendance at quarterly safety meetings
- Completion of quarterly safety training
- Zero significant violations of safety rules, policies or procedures

### **Transportation Bonus Program**

Our more than 700 transportation fleet drivers understand their responsibility to safely deliver fuel across the country. And we recognize our fleet drivers are one of our most valuable resources and the foundation of our wholesale distribution business. For that reason, we reward our drivers in the transportation fleet with HES performance bonuses based on their driving record.

### Drivers must maintain the following to receive bonus rewards:

- A clear record with no preventable vehicle accidents
- No reported incidents of damage to property
- No fuel release or cross drop of product

#### We also track:

- Hard braking or sudden stops
- Fuel economy
- Observance of speed limits
- Time management
- Safety meeting attendance
- Observation findings or situational awareness

In addition to performance incentives, we also reward annual bonuses for service milestones on five-year increments (5-10-15-20-25-30-35 years) of safe driving. We are proud that close to 200 people have been with the company for more than ten years.

Finally, Sunoco recognizes entire fleets when they obtain one million miles accident-free. In 2021, two fleets were recognized for reaching one million miles – Abilene and Odessa/Big Springs. Notably, our Lubbock fleet reached three million miles accident-free.



### **HES Incident Rates**

#### **Focused on Continuous Improvement**

Sunoco's goal is operational excellence, which means an injury- and incident-free workplace. To achieve this, we strive to hire and maintain the most qualified and dedicated workforce in the industry and make safety accountability part of our daily operations. The management team sets internal safety incident rate goals, setting the stage for continuous improvement year over year.

### **Total Recordable Incident Rate**

A key metric in examining a company's safety performance is the Total Recordable Incident Rate (TRIR). The TRIR provides a tangible measurement to quantify our safety performance for the year by calculating the number of recordable incidents per 200,000 hours worked. In 2021, our TRIR was 1.01 – a 45 percent reduction from 2017. This is an impressive rate and below our internal targets. The rate was bolstered by our Automotive Events Department and Fuel Crew Operations teams. Since Sunoco became the official fuel of NASCAR 18 years ago, our teams have recorded zero product defects, zero OSHA reportable incidents and zero loss of primary containment. Additionally, five of our Sunoco Transportation Teams had zero reportable incidents in 2021. Our teams in Altoona, Kingston, Mechanicsburg, New Haven and Northumberland were all incident-free in 2021.

## Sunoco's Safety Record vs. Other Industries

Sunoco's TRIR is well below other industries, primarily due to our strong safety culture and our approach to safety training, environmental compliance and continuous improvement.



### Preventable Vehicle Incident Rate

A metric for measuring vehicle safety is the Preventable Vehicle Incident Rate (PVIR). In 2021, Sunoco's PVIR was 0.41, well below our safety target for the year and a 61 percent reduction since 2017.

### **Good Catches**

A "good catch" – also referred to as a "near miss" – is when an employee recognizes a hazard or unsafe condition and addresses it before it results in an adverse safety or health outcome. Sunoco employees are highly encouraged to report such incidents. It helps us assess potential hazards and take the appropriate steps to prevent safety and environmental incidents. Information on good catches is collected and shared with employees to discuss lessons learned and encourage employees to be on the lookout for similar situations. In 2021, there were 129 good catches reported internally.

### **Reportable Spills**

Protecting the environment and the communities near our facilities is our top priority, not only because it is the right thing to do, but because it is a prudent business practice. One way we do this is by implementing best practices in areas of spill prevention and response. We're proud to report that several Sunoco assets recorded no reportable spills in 2021, including two transmix sites, 10 terminals, and four PSMcovered sites.

# Social Responsibility

### **Building for the Future**

Sunoco is committed to being a good neighbor, business partner and valued member of the communities in which our employees live and work. From our corporate offices to our retail stations and terminals, we work closely with the communities where we operate to identify and invest in initiatives that help support their needs. Our approach to social responsibility not only advances our business and mission to be a trusted fuel provider, but it also helps build positive relationships throughout areas we serve.



### Charitable Giving & Employee Volunteerism

Supporting the communities in which we operate is fundamental to who we are as a company. We do this by strategically investing in programs that make a difference in the lives of others by utilizing our robust charitable giving and employee volunteer programs. Sunoco employees are supported and encouraged to volunteer their time and talents to assist others in need and build relationships in their communities. When we all work together to build a more sustainable future, we can create lasting impacts.

In 2021, Sunoco supported close to 50 nonprofit organizations and donated over \$2 million dollars – a 34 percent increase from 2020. Our corporate giving efforts support nonprofit, 501(c)(3) organizations that focus on homelessness and hunger, disaster relief and emergency response, youth services, education, and veteran services. In many instances, we provide support to organizations identified by our customers across our distribution network. They know the unique needs of their communities, and we want to partner with them to help make a difference. Big or small, national or local, every charitable organization that we support has an important role to play in the communities where our employees and customers live or work.

Supported close to

nonprofits







#### Aga Khan Foundation

Sunoco donated \$125,000 to the Aga Khan Foundation in 2021, an organization that for over 50 years has partnered with communities in some of the most remote, hardto-reach parts of Asia and Africa to build better futures. Sunoco has supported the organization for many years and since 2014 has given more than \$800,000 to support their efforts. The donation helps fund the construction of schools and hospitals and other economic stimulus programs to educate and provide for those most in need.



#### Valero Benefit for Children Golf Tournament

Since 2014, Sunoco has been a proud supporter and participant in Valero's annual Texas Open golf tournament and has donated more than \$114,000. In 2021, Sunoco contributed \$32,000 and together helped generate more than \$16 million in net proceeds for children's charities across the United States.

### **Auto Dealers CARing for Kids Foundation**



Sunoco proudly sponsored the Philadelphia Auto Show's Black Tie Tailgate, an event benefiting the Children's Hospital of Philadelphia. The Auto Dealers CARing or Kids Foundation is the philanthropic arm of the Auto Dealers Association of Greater Philadelphia. Since 1986, the Black Tie Tailgate has raised money for the Children's Hospital. In 2021, funds raised directly benefited the Hospital's COVID-19 Relief Fund to support patient and family services.



#### **Bolla Markets Charity Foundation**

Sunoco donated \$25,000 to the Bolla Market Charity Foundation. Based in New York, the organization supports various community needs, including high school scholarships and STEM programming with the Girl Scouts. In the last five years, Sunoco has donated \$115,000 to the Bolla Foundation.



### **Dallas Children's Advocacy Center**

Sunoco donated \$15,000 to the Dallas Children's Advocacy Center, an organization that coordinates the investigation, prosecution, and healing services for the most severe cases of child abuse in Dallas County. The Center serves over 8,000 children who were sexually abused, severely physically abused, or who had witnessed a violent crime.

### Aloha Petroleum

Through our subsidiary Aloha Petroleum, we donated close to \$100,000 to organizations all across Hawaii. Corporate donations, as well as canister collections at Aloha Island Mart convenience stores, helped to support several organizations including the Salvation Army, Ronald McDonald House, and the American Red Cross. A few highlights include:



### Kapiolani Medical Center for Women and Children

Aloha Petroleum donated close to \$18,000 to the Kapiolani Medical Center for Women and Children's Neonatal Intensive Care Unit. As a not-for-profit medical center, Kapiolani relies on the community to fulfill its mission of creating a healthier Hawaii. The funds were raised through sales of the World's Finest Chocolate at Aloha Island Mart locations.



#### AccesSurf

Aloha Petroleum donated over \$7,000 to AccesSurf, an organization dedicated to providing adaptive water sports, ocean recreation, and therapeutic instruction for people with disabilities. The funds were raised through canister collection donations at participating Aloha Island Mart convenience stores.



### Parents And Children Together

Aloha Petroleum donated over \$9,000 to Parents And Children Together, an organization that serves over 17,000 of Hawaii's most vulnerable residents every rear by providing social and educational programs. Funds were raised by our naugural Giving Pump campaign. During the two-month-long campaign, one cent ber gallon was donated to the organization.



### **Fueling Education**

In 2021, Aloha Petroleum launched Fueling Education, a new month-long fundraising program. Participating locations donated three cents per gallon of any fuel to support a local high school. In 2021, \$5,000 was donated to Castle High School.



#### **Wreaths Across America**

In December, Sunoco employees from across the country volunteered with Wreaths Across America. The annual event pays tribute to our fallen veterans, honors those who serve, and teaches children the value of freedom by laying Christmas wreaths at cemeteries across the United States.

### **Energy Transfer / Sunoco Foundation**

A powerful advantage to our charitable giving efforts is our partnership with Energy Transfer through the Energy Transfer and Sunoco Foundation. The joint effort demonstrates our shared values of corporate stewardship and our belief in the importance of giving back to the communities in which we live and work. In 2021, the Foundation supported 10 organizations by donating \$1,750,000. Highlights include:

# \$500,000





#### **MD Anderson Children's Cancer Hospital**

We were proud to support the MD Anderson Children's Cancer Hospital and help fund critical research to advance pediatric cancer treatments. In 2021, the Foundation donated \$500,000 to MD Anderson Children's Cancer Hospital. It is also our largest ever employee-driven campaign. With the generosity of employees from Sunoco and Energy Transfer, more than \$10 million has been donated to MD Anderson since 2014. Every dollar donated goes directly toward the innovative and lifesaving cancer research and patient care initiatives at MD Anderson Children's Cancer Hospital.

### Philabundance

For more than a dozen years, the Energy Transfer/Sunoco Foundation has provided financial support to fuel the fleet of trucks, vans and cars that make it possible to deliver the food to their 350 agency partners across the Philadelphia area. In 2021 alone, the Foundation donated \$250,000 towards this initiative.



PHILABUNDANCE

#### **Mercy Street**

We donated \$150,000 to Mercy Street Sports, the sports ministry of Mercy Street, a Christian nonprofit with the mission to cultivate mutually transforming relationships with inner-city youth through sports, Christian mentoring, and leadership development. Since 2013, the foundation, along with support from company executives, has provided more than \$950,000 to Mercy Street.



### **Rajah Caruth**

Sunoco is a proud sponsor of Rajah Caruth in both the NASCAR and eNASCAR national series. As a fulltime driver, Rajah is quickly moving up into the top-levels of NASCAR.

### **Drive for Diversity**

Sunoco was one of the first companies to support Drive for Diversity, NASCAR's program designed to provide training and opportunities



for women and minorities within the racing industry. Through our annual marketing sponsorships with NASCAR, we have proudly given more than \$2 million since the program launched in 2004. Sunoco contributes up to \$120,000 annually to fund these and other programs that help bring the sport of racing to underrepresented communities in America.

#### since program launch in 2004 we have given

\$2+ million

annually we contribute up to

\$120,000

### Highlights from 2021

- Supported minority drivers with personal service agreements representing Sunoco in social media and at the track
- Provided free fuel to Rev Racing, the competition arm of NASCAR's Drive for Diversity Program

Supported the Drive For Diversity Combine, a race dedicated to identifying talented minorities to begin their journey as professional race car drivers

Supported young, minority drivers in eRacing as they work their way up into the professional eNASCAR ranks

### Community Impact

Our operations are directly linked to the communities we serve. In addition to the volunteer hours our employees contribute to their local communities and the millions of dollars Sunoco donates to charitable organizations annually, Sunoco provides quality employment opportunities in the communities where we operate with disciplines ranging from operations, engineering, environmental management, and safety. We contribute millions in local, state and federal taxes which help support local economies, first responders, teachers and other public employees and services.







### Stakeholder Relations

### **Building Strong Relationships**

We believe our social impact is unique given the variety of stakeholders we are privileged to work with. Every relationship is developed based on our core values and maintained with open and honest communication, promoting collaboration and mutual success. As a result, our business is anchored by lasting relationships and a large network of customers and consumers. We strive to become the partner of choice, and we're continuously strengthening and growing our partnerships because we know the thousands of independent operators and customers we partner with are what make our company successful.



### **Customer Service**

Sunoco has a team of over 20 people fully dedicated to responding to customer service inquiries. We strive to be responsive and dependable in all that we do. In 2021, our customer service team resolved 85 percent of customer requests on the first contact, an average of about 1.5 business days, which helped drive customer satisfaction into the top quintile. Additionally, almost 90 percent of all customer support requests were fully resolved within 24 hours by our customer service team. Our maintenance dispatch team is responsible for coordinating local technicians or contractors when a site has a problem that needs to be addressed. This team is staffed around the clock and every day of the year. Each year they successfully facilitate over 30,000 support requests.

### **30,000** successful support requests per year

90% of customer support requests resolved in 24 hours





Sunoco provides jet fuel terminal services for the U.S. Military. In 2021, three terminals reliably served nearly three million barrels of jet fuel to Andrews Air Force Base, Air Force One and Oceana Naval Air Station.



Most of our customers are independent small business operators, with the majority coming from diverse backgrounds and cultures. According to the Fiscal Policy Institute, immigrants make up 61 percent of all gas station owners.

# Disciplined Corporate Governance

### Building a Business Environment Conducive for Long-Term Growth

Sunoco is committed to operating our business in a safe, responsible and ethical manner through sound corporate governance that promotes transparency, accountability and respectful engagement with our stakeholders. We believe sound corporate governance principles are the bedrock of our company. They will help us achieve operational excellence and are fundamental to generating longterm value for our stakeholders and society.

### The SUN Team

### **A Dedicated Work Family**

At Sunoco, we take great pride in what we do and wholeheartedly believe our team members drive the success of our company. In 2021, the "SUN Team" included 2,225 employees from across the country. The bonds that tie our family-friendly culture were strengthened during the COVID-19 pandemic. Our employees' relentless dedication to delivering essential fuel products remained steadfast during the global pandemic.

We go to great lengths to recruit and invest in our employees who share our core values and who bring their own unique backgrounds, experiences and perspectives to share in our vision of excellence and growth. We value a stable, diverse, inclusive and respectful workplace. In fact, in 2021, 56 percent of our employees self-identified as being part of a minority population. We deeply value the military service members who

### **Fun Facts About the SUN Team:**

- Over half of our employees are from minority populations
- Over 120 veterans and active-duty service members
- 290 employees represented by unions
- Nearly 40 women in operations and engineering
- Close to 200 people have been with the company more than 10 years

serve our nation, and we're proud of the 120 veterans and activeduty service members that are part of the SUN Team. Also, we strive to encourage, support and empower women within our organization. Our engineering and operations departments include close to 40 women.

### 2021

30% women employees

women in management 54% employees from minority populations



\*Minority is defined as non-white or employees who selected more than one race

We strive to offer competitive wages, provide learning and advancement opportunities, and foster an atmosphere where health, safety, and wellness are significant factors in how we operate our business.

#### Our benefits include:

- 401(k) with an employer match
- Choice of multiple levels of medical, dental, vision
  and prescription plans
- · Paid vacation, sick time and holidays
- Short-term and long-term disability plans
- Industry-leading total compensation packages

A unique factor that differentiates Sunoco is our focus on developing staff and promoting from within and we're proud that in 2021 close to 200 people had been with the company for over 10 years. Employees are treated like family and when someone is in need, we have their back. When Carmen Burgen, Supervisor of Wholesale Accounting, received the devastating news that her four-year-old son was diagnosed with leukemia in 2017, she was supported by the SUN Team.

"The leadership at Sunoco supported me during my son's cancer treatments. From thoughtful gift baskets at the hospital, an accommodating work schedule, and amazing family medical insurance coverage, my job at Sunoco really became a lifeline to me and my family."

- Carmen Burgen

Carmen, who has been with the

company since 2010, received accolades for her hard work, receiving two promotions within the five years her son battled cancer. Today, Carmen's son is cancer-free and Carmen remains a valued member of the SUN Team.



In 2021, Casie Bui, Senior Manager – Sales Operations and Marketing, was recognized as one of Hawaii's top 40 under 40 business professionals by the Pacific Business News.



# Employee Training & Development

We believe a company is only as good as its people. That's why our people are our most valued resource. Sunoco invests in the growth of our employees through training and development opportunities to ensure that our employees across the country are prepared and empowered to lead. Employees are also encouraged to invest in themselves – and leadership is driven to inspire employees – to maintain a unified focus on operating excellence. Excellent training and development, combined with a culture of honesty, trust and respect, helps establish the strong foundation of our company.

In 2021, we rolled out a new, comprehensive training dashboard that allows company management to actively monitor training activities. Companywide, there are 16 compliance trainings that are actively managed and updated, in addition to numerous targeted trainings. As a result of the new dashboard, employee trainings are prioritized, and completion rates have improved. In 2021, 96 percent of employees completed the Code of Business Conduct and Ethics training.

Required compliance trainings for all employees include:

- Code of Business Conduct and Ethics
- FCPA/Anti-Corruption
- FERC Standards of Conduct
- Conflicts of Interest, Gifts, Insider Trading
- Sexual Harassment

The Compliance Training department keeps open lines of communication with the Office of Ethics and Compliance (OEC), Legal, Human Resources and other various departments in determining and adjusting the training materials. The OEC reviews gifts, conflicts of interest, due diligence and ethics helpline activity, and provides feedback to the Compliance Training department on necessary changes based on compliance incidents. Each training course provides the participant with the contact information of applicable departments if they need guidance or have any questions or concerns. Employees have access to webinars that expand their knowledge of our business and provide training on interpersonal development and the ongoing refinement of business skills. Sunoco also offers a series of leadership development opportunities, including for emerging leaders, designed to educate supervisors on how to lead and motivate employees, along with how to effectively engage in performance and development conversations with direct reports.



### SMU Executive Leadership Development Program

Sunoco's Executive Leadership Development Program, developed in partnership with SMU's Cox School of Business, is designed to provide an advanced, high-quality learning experience to develop the following areas of leadership:

- Leveraging Trust & Influence for Results
- Leading Effectively & Understanding
  Organizational Change
- The Impact of Culture
- Strategic Thinking for the Entrepreneurial Mindset



#### Sunoco Fleet University

The United States faces a truck driver shortage. According to the American Trucking Association, in 2021, trucking companies recorded a record deficit of 80,000 drivers. Furthermore, the average age of a commercial trucker is 55 years old, meaning most will retire in the next 5 to 10 years.

In 2021, Sunoco successfully launched a new training program designed to attract the next generation of truck drivers. The Sunoco Fleet University recruits those with zero experience in commercial trucking. We partner with external local truck driving schools to train candidates for their Commercial Driver's License. Then trainees attend Sunoco Fleet University, a two-week program led by Sunoco's safety department, which focuses on both company and regulatory policies. Finally, trainees complete a 6 to 10 week training in their region. Upon satisfying all training requirements, the driver officially becomes a Sunoco Transportation Driver.

### **Cybersecurity**

**Maintaining Robust Cybersecurity Protections** 

Protecting the nation's energy infrastructure from the real and ever-changing threats from cybercriminals and foreign states is a critical focus for Sunoco. We strive to proactively protect our assets, customers, consumers and employees through a robust cybersecurity program.

Our information technology departments and sales managers work closely with our retail customers to ensure we meet and often exceed required protections as it relates to cyber technology.

Our retail network is fully Payment Card Industry Data Security Standard (PCI DSS) compliant. To maintain this standard, we submit to a full third-party PCI assessment on an annual basis which ensures we meet or exceed all areas of PCI DSS. Part of this audit also includes evidence of daily, weekly, monthly and quarterly internal assessments to ensure we remain compliant between audits.

The Sunoco retail network leverages full segmentation between point of sale, back-office solutions, individual stores, as well as all data center activities. We maintain this segmentation with continuous vulnerability scanning, ongoing patch management, host intrusion prevention detection, and both logical and physical network isolation.

Beginning in 2020, we began the deployment of Europay, Mastercard, and Visa (EMV) protections at a variety of our locations for both indoor and outdoor transactions. We're proud that 100 percent of company-owned locations use EMV protections. We also partner closely with our dealer and



distributor locations to convert to EMV, helping to safeguard their assets as well.

Sunoco participates in state-level skimmer monitoring and intelligence sharing networks. We use security seals on all fuel pumps and payment acceptance devices and conduct visual inspections of all payment acceptance equipment. We participate in both the National Petroleum Energy Credit Association and Conexxus communities to be able to share and learn best practices across the industry.

In 2021, we began a new, multi-year security initiative to bolster payment security utilizing end-to-end encryption. Encryption brings best-in-class security and will help provide cardholder data protection.

Employees are trained annually on corporate cybersecurity protections. In 2021, 97 percent of employees successfully completed the training. In addition, when accessing our systems remotely, we require all employees, vendors and service providers to use multi-factor authentication.

With the help of our business partners, our dedicated staff, and customers in the industry, we continue to combat everchanging cybersecurity threats to protect our valued consumers and stakeholders.

### Board of Directors

#### **Strategic Oversight and Accountability**

Sunoco's business is managed under the direction of our General Partner, solely owned by Energy Transfer, and Board of Directors. Our Board provides strategic guidance and independent oversight, and our diverse management team focuses on operating our business. Together, leadership works closely to monitor risks and opportunities, including those related to sustainability and corporate responsibility.



The Sunoco Board has seven members, including four independent directors, and comprises two committees:

### **Audit Committee**

Its primary purpose is to assist the Board in its oversight of the integrity of financial statements, compliance with legal and regulatory requirements and the Code of Business Conduct and Ethics, the independent auditor's qualifications and independence, and performance of the internal audit function and independent auditors.

### **Compensation Committee**

Its primary responsibility is to evaluate and recommend to the Board the director and executive officer compensation plans, policies and programs.

### Ethical Governance Practices

### **Code of Business Conduct and Ethics**

Our Code of Business Conduct and Ethics (Code) reflects our commitment to adhering to the highest ethical standards. It helps foster a culture of honesty, accountability and integrity and helps maintain the confidence of our investors, employees, customers, suppliers and others with whom we do business. Sunoco requires that all business of the company be conducted in a lawful and ethical manner. Sunoco's Code can be found on our website and covers a range of policies, including:

- Compliance with laws, rules and regulations
- Conflict of interest
- Acceptance of gifts and favors or other gratuities
- Payments and gifts to government officials
- Compliance with international trade laws
- Antitrust
- Protection and proper use of assets and proprietary information
- Work environment

- Ethical behavior
- Financial recordkeeping
- Full, fair, accurate and timely disclosure for SEC filing
- Prevention of insider trading
- Tax evasions
- Political contributions
- Concealment of information from auditors
- Reporting suspected violations of the Code
- Prohibited trading transactions

### **Equal Opportunity and Anti-Discrimination**

Sunoco has a steadfast, unwavering commitment to equal employment and non-discrimination. Our Equal Employment Opportunity and Anti-Discrimination, Anti-Harassment, Non-Retaliation and Disability Accommodation Policies are set forth in our employee handbook as our Governing Principles of Employment (EEO Policies). The EEO Policies prohibit any discrimination, harassment and/or retaliation based on race, color, religion, sex, national origin, age, disability, pregnancy, veteran status, citizenship status, or any other characteristic protected by law. Employees are provided with multiple avenues to report any violations of the policies, including a confidential helpline. Sunoco promotes equal employment and equal opportunity through leadership and developmental trainings, including our Inclusive Leadership training (required for all managers and above), and our affirmative action programs.

### **Union Relations**

Sunoco respects the right of employees to choose whether to be represented by a union. In 2021, approximately 290 Sunoco employees in the United States were represented by unions. We strive to build and strengthen our relationship with labor leadership through open and honest communication that promotes a greater understanding of the needs of all parties and fosters opportunities for growth for both.

#### **Risk Management**

At Sunoco we take pride in long-term strategic planning, which includes risk management. We recognize that actively managing risks is a core component of sustainability. Business and operational risks are regularly reviewed as part of our Enterprise Risk Management program. Our risk management procedures are monitored and reviewed for effectiveness through an audit assessment, the results of which are reported to executive management.

#### **Confidential Helpline**

Sunoco's Confidential Helpline is a simple and confidential way to seek assistance and report potential violations regarding financial statement disclosures, accounting, auditing matters, or any issue arising under Sunoco's Code of Ethics, Corporate Governance Guidelines or existing laws, regulations, professional standards or reporting requirements. Any person - an employee, former employee, whistleblower, or concerned citizen - can report instances of possible noncompliance. The helpline is administered by an independent third-party and is available 24-hours a day, 7 days a week. There is an established process for appropriately handling reports. All reports are escalated to the Chief Compliance Officer, the Office of Ethics and Compliance, Human Resources and the Internal Audit Group and then investigated and promptly resolved. Calls are anonymous unless you choose to provide your name and contact information. Sunoco does not allow any form of retaliation based upon the use of the helpline.



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