California Transparency in Supply Chains Act Disclosure

On January 1, 2012, the California Transparency in Supply Chains Act of 2010 (SB 657), codified at California Civil Code Section 1714.43, takes effect in the State of California. The law was designed to increase the amount of information made available by manufacturers and retailers regarding their efforts (if any) to address the issues of slavery and human trafficking in their direct supply chains.

As an independent petroleum refiner and marketer, Valero’s main supply chain involves acquiring crude petroleum oil and other petroleum feedstocks for processing into finished petroleum products (as well as acquiring materials like catalyst necessary for the operations of its refineries). Valero believes this type of supply chain is not inherently susceptible to violations of slavery and human trafficking laws. Thus, while Valero has not undertaken action with the intent of specifically addressing California Civil Code Sections 1714.43(c)(1) – (c)(5), Valero recognizes and respects all labor and employment laws, including those addressing slavery and human trafficking, wherever Valero operates.

Obeying all applicable laws, in letter and in spirit, is the foundation on which Valero’s business ethics standards are built. Valero’s Code of Business Conduct and Ethics requires all Valero employees to obey all local, regional and federal laws of the locations where Valero operates, including laws regarding slavery and human trafficking. Valero trains employees on its Code so that each employee understands the substance of the Code and how to abide by its contents. Further, Valero takes seriously all potential legal or Code of Business Conduct and Ethics violations, and encourages all persons subject to its Code to preserve Valero’s highest standards for business ethics and integrity by reporting suspected violations to their supervisors, human resources representatives, or through Valero’s 24/7 business abuse hotline.