

In the matter of
ConocoPhillips Company

ASSURANCE OF VOLUNTARY COMPLIANCE

BACKGROUND

WHEREAS, the undersigned Attorneys General believe that underage access to tobacco products constitutes a serious and continuing threat to public health based upon the following:

- more than 80% of regular adult smokers began smoking as children;
- every day in the United States about 2,000 children begin smoking cigarettes, and one third of those children will one day die from a tobacco-related disease;
- studies show that the younger a person begins smoking, the more likely it is that he or she will be unable to quit in later life and will suffer a disease attributable to tobacco use;
- studies indicate that youth demonstrate signs of addiction after smoking only a few cigarettes;
- according to the United States Food & Drug Administration (“FDA”), on average among all U.S. retailers, one in every four attempts by a person 15 to 17 years old to purchase cigarettes over the counter results in a sale;
- an estimated 690 million packs of cigarettes are sold illegally to children each year nationwide, and 47% of youth who report buying cigarettes identify retail outlets that sell gasoline as their primary point of purchase, and another 27% identify convenience stores;
- more than 400,000 Americans die each year from diseases caused by tobacco use;

WHEREAS, ConocoPhillips Company (hereafter referred to as “ConocoPhillips”) is proud of its tobacco marketing policies and programs, and believes them to be in full compliance with laws and regulations;

WHEREAS, ConocoPhillips nevertheless is committed to doing more to demonstrate its commitment to the health and welfare of our nation’s youth, and to step forward voluntarily to lead additional efforts against youth access to tobacco;

THEREFORE, ConocoPhillips agrees to enter into the following Assurance of Voluntary Compliance on the terms set forth below.

AGREEMENT

1. This Assurance of Voluntary Compliance (“Assurance”) is entered into by the Attorneys General of the States of Arizona, Arkansas, California, Colorado, Connecticut, Florida, Hawaii, Idaho, Illinois, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New York, Oklahoma, Oregon, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, Utah, Vermont, Virginia, Washington, West Virginia, Wisconsin and Wyoming (collectively “the