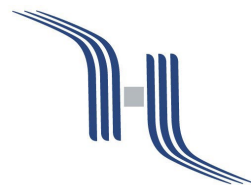


# SUPPLIER CODE OF BUSINESS CONDUCT AND ETHICS



**HOLLY ENERGY PARTNERS®**

## CEO MESSAGE



**TIM GO, CHIEF EXECUTIVE OFFICER OF HF SINCLAIR CORPORATION**

Our stakeholders expect our organization and our entire network of business partners to operate in an honest, ethical manner, in accordance with applicable laws and regulations, and guided by shared values.

We expect our Suppliers to adhere to the same standards of conduct and behavior that we expect from our own employees while Suppliers are on our property or doing business on our behalf. Our Supplier Code of Business Conduct and Ethics is based on those principles.

This Supplier Code of Business Conduct and Ethics (the “**Code**”) outlines our ethical expectations concerning labor practices and human rights, health and safety, environmental protection, and business management. As a Supplier, you are responsible for knowing and adhering to all applicable regulations and performing due diligence on your sub-contractors to ensure their compliance with those regulations and with this Code. You also have an obligation to report any actual or suspected violations of the Code directly to our organization’s Legal and Compliance department.

Thank you for your support,

A handwritten signature in black ink, appearing to read 'Tim Go', with a stylized flourish at the end.

Tim Go

This Supplier Code of Business Conduct and Ethics (this “**Code**”) reflects the commitment of HF Sinclair Corporation, Holly Energy Partners, L.P., and their respective segments, divisions, subsidiaries and affiliates (including affiliates of our Lubricants and Specialties division such as Petro-Canada Lubricants Inc., Sonneborn Refined Products B.V., Sonneborn, LLC, and HollyFrontier LSP Europe B.V.) worldwide (collectively, “HF **Sinclair**”) to conduct business with unquestionable integrity and in compliance with all applicable laws, rules, and regulations and to partner with businesses that share HF Sinclair’s commitment. This Code applies to anyone – including Suppliers, vendors, contractors, licensees, and agents (collectively, “**Suppliers**”) that supply products and/or services to HF Sinclair. This Code defines our minimum expectations. HF Sinclair Suppliers must, directly or indirectly, through its subcontractors, comply with all international, national, country, state and local laws and ordinances and all lawful orders, rules, regulations, codes, standards and treaties. Non-compliance, directly or indirectly, with any directive, rule, or regulation stated in this Code will result in immediate termination of the business relationship, and HF Sinclair will seek any available remedies at law or in equity for such violation.

## **Legal Compliance**

Suppliers must comply with all applicable laws and regulations in their country of operation. In addition, Suppliers must not directly or indirectly give or receive improper business advantage by giving or receiving anything of value in exchange for preferential treatment. Suppliers are expected to maintain strict compliance with all applicable laws, including, but not limited to, laws regarding:

- Anti-corruption and anti-bribery, including in all cases the United States *Foreign Corrupt Practices Act*, Canada’s *Corruption of Foreign Public Officials Act*, the U.K. *Bribery Act 2010*, and the Organization for Economic Cooperation and Development Convention on Combating Bribery of Foreign Public Officials in International Business Transactions;
- Political contributions and payments;
- Data protection;
- Import and export controls, including U.S. anti-boycott laws; and
- Trade and anti-trust

## **Trade Laws**

Suppliers are required to comply with all international, national, country, state, local laws and ordinances as well as all lawful orders, rules, regulations, codes, and treaties governing the import, export, re-export and transportation of goods and materials.

## **Fair Competition**

HF Sinclair believes in free and open competition and complies with the antitrust and competition laws in every country where we do business. Suppliers shall not misrepresent the characteristics of HF Sinclair products or services, act dishonestly, or engage in any other unfair or anticompetitive practices. Suppliers should avoid creating even the appearance of improper conduct.

Suppliers are required to comply with all applicable antitrust and competition laws and regulations. Robust and fair competition practices include, but are not limited to:

- Bidding independently from competitors;
- Not discussing bidding practices with competitors;
- Not entering into agreements, coordinated practices, or understandings that could restrict competition;
- Not exchanging sensitive information with competitors (including pricing, costs, production data, market data, sales territories, Supplier or distribution channels, customer lists, or other non-public business information); and
- Only gathering information about competitors using means that are ethical and legal.

## **Fraud**

HF Sinclair will not tolerate any act that involves theft, fraud, falsification, embezzlement or misappropriation of any HF Sinclair or customer asset. These dishonest acts are incompatible with HF Sinclair's values and culture. Distributors shall not engage in any such misconduct including, but not limited to:

- The theft of funds or property;
- Misusing resources for private purposes;
- Making or submitting false claims;
- Forging invoices or creating fraudulent reports or documentation;
- Misrepresenting the nature of transactions; and
- Intentionally filing false financial records or statements.

## **Giving or Receiving Gifts, Travel, or Entertainment**



Providing gifts, travel, or entertainment can be appropriate under certain circumstances (i.e., gift baskets at holiday time), but it can also create the appearance of impropriety and/or violate the law. Suppliers must never offer, give, request, or receive anything of value in exchange for an improper business benefit or to improperly influence an act or decision.

Gifts, travel, and entertainment that give the appearance of impropriety or which are illegal, lavish, frequent, vulgar, and/or in exchange for an improper business advantage are strictly prohibited.

Suppliers shall ensure that any gifts, travel, and entertainment are permitted by this Code and all applicable local or other laws, regulations or policies and that they are always modest and infrequent, reasonable, properly recorded, and for a legitimate purpose.

## **Insider Trading**

Suppliers should ensure that non-public information obtained in the course of its business relationship with HF Sinclair or publicly traded third parties is not used for any improper purpose. Suppliers should ensure their employees and related parties never trade shares in any company based on inside information, never disclose inside information or encourage anyone to make a decision on trading shares based on inside information.

## **Data Privacy / Proprietary Information / Intellectual Property**

Privacy, data and information security is of the utmost importance to HF Sinclair. Suppliers shall keep personal information of HF Sinclair customers and employees confidential and secure. Additionally, Suppliers shall be compliant with applicable laws and regulations on the collection, transfer, processing, and retention of personal information. Access to personal information should be restricted to those employees of the Supplier designated as having a need to know that information for legitimate business or legal reasons.

HF Sinclair proprietary data and information is disclosed in confidence and shall be and remain HF Sinclair's sole property, and such items or any copies, articles or parts therefrom will not be furnished to others without HF Sinclair's written consent. Supplier agrees that:

- No rights or licenses are granted to Suppliers for any communicated HF Sinclair proprietary data or information;

- Supplier will protect the confidentiality of HF Sinclair’s proprietary data and information in the same manner that it protects the confidentiality of its own similar confidential information, but in no event using less than a reasonable standard of care; and
- Supplier will abide by the non-disclosure provisions in any agreement with HF Sinclair to protect the integrity and proprietary nature of all HF Sinclair confidential information.

## Health and Safety

Suppliers must provide a safe and healthy working environment for all employees that includes appropriate controls, safety procedures, preventative maintenance, and protective equipment. All business practices must comply with all relevant local and national laws, codes and regulations. HF Sinclair expects its Suppliers to continually look for ways to minimize waste, emissions and discharge in their operations, products and services and to establish and maintain a management system or program that encourages continual improvement in environmental, health and safety performance.

Suppliers must make sure that all workers are adequately qualified, equipped and trained to perform their work functions safely. Suppliers must have clear procedures in place for tracking, reporting and addressing health and safety incidents. Suppliers shall provide workers with appropriate, effective personal protective equipment (PPE) and instructions on its proper use.

Suppliers must have procedures and plans in place for handling emergencies such as fires, spills and natural disasters.

## Environmental Protection

Suppliers shall develop and administer environmentally responsible business practices, including conserving natural resources and energy, reducing waste and the use of hazardous substances, and minimizing adverse environmental impacts.

*Environmental laws* - Suppliers must comply with applicable environmental laws and requirements and obtain and keep current all required permits.

*Pollution* - Suppliers shall responsibly dispose of or recycle hazardous substances. They shall effectively control harmful air emissions from their operations, including volatile chemicals, corrosives, particulates, ozone-depleting chemicals, and combustion by-products. Suppliers shall prevent contamination of storm water runoff. Suppliers shall limit noise generation.

*Sustainability* - To the extent possible, Suppliers shall implement reuse and recycling programs. They will work with their own sub-contractors to assess and handle relevant

environmental and sustainability issues within their supply chains, including conserving natural resources, and ensuring product safety and animal welfare.

## **Labor / Human Rights / Modern Slavery**

All employees in Supplier organizations deserve to work in a productive environment where they are treated fairly and respectfully.

**Child Labor:** Suppliers must only employ workers who meet the applicable minimum legal age requirement. Suppliers are also expected to comply with all other applicable child labor laws. HF Sinclair is committed to the elimination of the “worst forms of child labor,” as defined by International Labor Organization (ILO) Convention 138 & 182, from its supply chain. We expect our Suppliers to support and participate in industry efforts aimed at the elimination of such practices wherever they exist in the supply chain.

**Forced Labor:** Suppliers must not utilize or benefit in any way from forced or compulsory labor, nor utilize factories or subcontractors that force unpaid labor. Suppliers must support and respect the protection of internationally proclaimed human rights and not willingly or knowingly assist in any violation of human rights, nor benefit from human rights abuses committed by another party, nor remain silent when human rights violations are being committed.

**Wages and Hours:** Suppliers should provide wages at least equal to the applicable legal minimum wage and any associated statutory benefits. If there is no legal minimum wage, Suppliers must ensure that wages are at least comparable to those at similar companies in the local area or to prevailing industry norms. Working hours should reflect applicable legal norms and overtime hours should be paid at the legally mandated rate or at least at the same rate as regular hours worked if there is no mandated rate.

**Discrimination:** Hiring and employment decisions, including those relating to compensation, benefits, promotion, training and development, discipline, and termination, should be made solely on the basis of the skill, ability, and the performance of workers. Discrimination is not permitted on the basis of race, color, gender, sexual orientation, age, religion, gender identity, political opinion or membership, national extraction, social origin, veteran status, disability, or maternity.

**Harassment:** Suppliers shall provide a workplace free from harassment and abuse, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse.

**Freedom of Association:** Suppliers should respect their employees' right to freedom of association including the right to collectively bargain, consistent with local laws and ensure that all employee relationships are of a voluntary nature.

**Human Trafficking and Slavery:** HF Sinclair is opposed to slavery and human trafficking and is committed to complying with applicable laws prohibiting such exploitation. Suppliers are expected to fully comply with all laws, rules and regulations in support of HF Sinclair's efforts.

## **Conflict Minerals**

In adherence to Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act and its aim to end human rights abuses in the Democratic Republic of Congo ("DRC") and its adjoining countries, Suppliers are expected to adhere to HF Sinclair's Conflict Minerals Policy, which can be found at <https://www.hfsinclair.com/Suppliers/conflict-minerals-policy/default.aspx>.

## **Conflict of Interest / Ethics**

Suppliers must avoid actual or apparent conflicts of interest and should make sound business decisions in the best interests of HF Sinclair, undistorted by personal interests. A conflict of interest may exist whenever a Suppliers' private interests or personal activities or relationships interfere or appear to interfere with the duties performed at, or owed to, HF Sinclair. If you discover that a personal activity, investment, interest or association could compromise – or even appear to compromise – your objectivity or ability to make impartial business decisions, disclose it immediately to your designated HF Sinclair procurement representative, who will contact the Chief Compliance Officer to obtain approval, if appropriate.

The HF Sinclair Corporation Code of Business Conduct and Ethics and the Holly Energy Partners, L.P. Code of Business Conduct and Ethics each set forth the ethical and legal standards of business conduct expected from all HF Sinclair directors, officers, and full-time, part-time or temporary employees, as well as anyone else acting on behalf of HF Sinclair. As a Supplier to HF Sinclair, it is essential that your employees are made aware of the contents of this Code. Additionally, Suppliers should have adequate monitoring and record keeping systems to ensure compliance with this Code, and HF Sinclair reserves the right to audit such systems to verify Supplier's compliance.

## **Speak and Be Heard: Our Ethics Reporting Line**



Any Supplier who believes that a HF Sinclair employee, or anyone acting on behalf of HF Sinclair, has engaged in illegal or otherwise improper or unethical behavior, such as requesting anything of value from a Supplier, is asked to notify HF Sinclair by filing a report on the HF Sinclair Speak and Be Heard reporting line.

To access the HF Sinclair Speak and Be Heard reporting line (formerly known as the Ethics and Compliance Hotline), please visit [www.speakandbeheard.ethicspoint.com](http://www.speakandbeheard.ethicspoint.com) or call the U.S. Toll Free at: +1 (844) 893-1072 (for those calling toll-free outside the United States, the access code for your specific country can be found on the website at the aforementioned address). A Supplier's relationship with HF Sinclair will not be affected by an honest report of potential misconduct.

## **Supplier's Certification of Compliance**

By its acceptance of any purchase order from HF Sinclair or the provision of any goods or services pursuant to a contract with HF Sinclair, Supplier acknowledges acceptance of this Code and its agreement to comply with all requirements of this Code. This Code supplements, but does not supersede, any and all rights maintained by HF Sinclair under any contract with Supplier. If you have additional questions about this Code, please contact your designated HF Sinclair procurement representative or email the HF Sinclair Legal & Compliance department at [compliance@hfsinclair.com](mailto:compliance@hfsinclair.com).