

**LIVING OUR VALUES:
THE HF SINCLAIR CORPORATION
CODE OF BUSINESS CONDUCT AND ETHICS**



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LIVING OUR VALUES: A MESSAGE FROM TIM GO



Tim Go

Chief Executive Officer and President of HF Sinclair Corporation

We expect our employees to act according to our core values – safety, integrity, teamwork, ownership, inclusion – every day. Acting with integrity means doing the right thing, even when no one is looking. Our Code of Business Conduct and Ethics (the “Code”) guides our decisions, strategy and everyday interactions and provides guidance for what acting with integrity means. Each of us has the responsibility to follow this Code when dealing with internal and external stakeholders. It is important that you read it, understand it, follow it. If you are ever in doubt about what it means, you should ask. If you become aware of anything that is against the law, our policies or our Code, you must report it. Our reputation, our culture and our integrity depend on you taking action.

Thank you for upholding our company’s values.

Sincerely,

A handwritten signature in black ink that reads "Tim Go". The signature is fluid and cursive, with the first and last names clearly legible.

Tim Go

INTRODUCTION

Living Our Values

At HF Sinclair, we are united by our five core values.



Safety. Our goal is to make sure everyone returns home safely each day. It is an essential component of our successful operations and our commitment to protect the well-being of our workforce, communities and the environment.



Ownership. We hold ourselves accountable for our operations and efforts. We empower employees to take ownership and initiative to bring about positive results.



Integrity. Sustaining a culture of ethics and compliance enables us to operate with integrity across the world.



Inclusion. We strive to provide a work environment in which employees feel valued and included in decisions, opportunities and challenges.



Teamwork. We know that the strength of our teams lies in our combined expertise and experiences, diversity of skills and our ability to trust each other.

Our Code and our values reflect who we are and what's important to us.

The Code reflects the commitment of HF Sinclair Corporation, and its segments, divisions, subsidiaries, and affiliates worldwide (collectively, the “Company”) to conduct business with unquestionable integrity and in compliance with all applicable laws, rules, and regulations.

The Code is a resource for, and applies to, all Company representatives – directors, officers, full-time, part-time, temporary, or contract employees and consultants of the Company regardless of location, seniority level, business unit, function, or region.

While it contains the Company's core standards, it is not a complete manual that describes all of the Company's policies and procedures governing every situation. It's important to use good judgment in everything you do and to ask for help if you're ever unsure about the right course of action.

Failure to comply with the Code, Company policies and procedures, and applicable laws and regulations may result in disciplinary action including, but not limited to, termination of employment. If you have any questions, do not hesitate to contact your manager or supervisor, the Human Resources (“HR”) Department or the Legal & Compliance Department.

If you have any concerns about possible violations of this Code, any Company policies or procedures, or any applicable laws and regulations, please report them promptly to your manager or supervisor, the HR Department, or the Legal & Compliance Department. You may also report through our Speak and Be Heard reporting line (formerly known as EthicsPoint). Go to “Where to Go for Help” for additional information.

WHAT IS EXPECTED OF ME?

We all have a responsibility to uphold our values in our work and in the business decisions we make.

Your actions should be consistent with our values and our commitment to conduct business with unquestionable integrity.

You are expected to:

- Know and fully comply with the laws, regulations and Company policies and procedures that apply to your job.
- Be alert to any situations or actions that may violate the Code, Company policies and procedures, applicable laws and regulations, and report them promptly.
- Seek guidance from your manager or supervisor and/or the Legal & Compliance Department any time you are unsure of the requirements that may apply to you.
- Serve as a role model for our ethical standards and work to create and sustain a culture of compliance.
- Create a work environment that is collaborative and inclusive, recognizes effort, appreciates teamwork, encourages continuous learning, and values mutual respect and open communication.

ADDITIONAL EXPECTATIONS FOR MANAGERS AND SUPERVISORS

If you manage or supervise others, you play an important role in shaping our culture, therefore you must lead by example.

- Be a resource for employees who have questions about what is expected of them.
- Strive to create a positive work environment in which employees feel comfortable with, and responsible for, raising questions and concerns about possible violations of the Code, Company policies and procedures or applicable laws and regulations.
- Respond promptly. When an employee raises a concern with you, it is important that you listen and take appropriate action, which may include contacting the Chief Compliance Officer or your HR Business partner.

- Foster an environment in which employees can speak up without fear of retaliation. Speaking up is so important to the success of our company, whether it is raising ethical or business concerns. Retaliation can include both overt forms (such as a demotion, poor performance reviews or public attacks on the employee who raises a concern) and more subtle forms (such as excluding the employee for social events, withholding important job-related information or ignoring the employee's suggestions).

CONSEQUENCES OF VIOLATIONS OF THE CODE

Individuals who fail to comply with the Code will be subject to disciplinary action, which may include termination of employment. In some circumstances, legal authorities may impose fines and criminal penalties on individual employees. The Company may not be able to reimburse employees against these fines/penalties.

RECOGNIZING THE RIGHT THING TO DO

At the Company's core is a commitment to doing the right thing for the right reason, even when no one is watching. When faced with an ethical decision, consider both the short-term and long-term consequences of your actions. Make sure you have all the information you need to make a good decision. Then, if you are ever unsure about what to do, ask yourself the following questions:



If the answer to any of these questions is “no,” or “not sure”, do not proceed. Always ask before acting. It is never okay to ignore the Code, Company policies or procedures, or applicable laws and regulations. If you encounter any situations in which the right choice is unclear or there is conflicting information, you are expected to seek guidance and do the right thing in that situation.

Talk to Someone Else

If you need to raise a question or concern, your immediate manager or supervisor is there to help.

Talk to another manager or supervisor

If you are not comfortable talking to your immediate manager or supervisor, you can discuss the issue with a higher-level manager in your reporting line. You can also contact the HR Department to report your concerns.

Report it in another way

You may also contact the Speak and Be Heard reporting line, the Legal & Compliance Department, or the Chief Compliance Officer. Contact information is available in the “Where to go for Help” section at the end of the Code.

The Speak and Be Heard reporting line is available globally 24 hours a day, seven days a week. It is staffed by an independent company and can take calls in multiple languages. When calling the Speak and Be Heard reporting line, you can report actual or suspected violations anonymously, where allowed by applicable law. Please keep in mind that it may be more difficult or even impossible to thoroughly investigate reports that are made anonymously. Preventing retaliation for people who make reports in good faith are a priority to the Company.



SPEAK UP WITHOUT FEAR



Steve Ledbetter

Executive Vice President, Commercial

"Employees are our company's experts on the ground. Nobody is better equipped to identify small issues before they escalate into serious problems. Each of us has an obligation to report misconduct and everyone has a right to do so without fear of retaliation. Retaliation erodes our culture and is simply unacceptable. See something, say something. We all own our business and are responsible for protecting our license to operate."

We don't tolerate retaliation.

As a Company we know it takes courage to come forward and share your concerns. We won't retaliate or permit retaliation against anyone who raises questions or concerns, anyone who promptly reports an alleged violation, or anyone who participates or cooperates honestly and completely in the investigation of a report.

Regardless of the type of misconduct reported or the method of reporting, you can be confident that you're doing the right thing and that your concern will be handled promptly and appropriately. We investigate all reports thoroughly, disclosing information only to those who need to know. Anyone involved in any form of retaliation may face disciplinary actions up to and including termination of employment.



WE PROMOTE AN ETHICAL WORKPLACE

Promoting respect in our workplace.

The Company is committed to providing a fair, safe, secure, productive, respectful and inclusive work environment for all of our employees. To that end, the Company has implemented policies that address non-discrimination, along with a number of environmental, health, and safety, issues, all of which may be found in the Company's Employee Manual. In an era when political conversations can generate contention and division, as employees, all of us need to have a clear understanding of what constitutes acceptable and unacceptable behavior in this area. Overall, political activity and conversations should not interfere with work, cause disruptions or ill will among co-workers or infringe on achieving our business objectives, and organizational resources should be reserved for organizational business only.

If you have any questions about these policies, please ask your manager or supervisor, HR representative, or the Legal & Compliance Department.



Dale Kunneman
Senior Vice President and Chief Human Resources Officer

"Living our cultural values includes creating a work environment where everyone feels a sense of inclusion, and belonging. We all want and deserve to work in a place where we feel respected, valued, heard and acknowledged. Each of us has a responsibility to create this environment everyday."

Living Our Values

- Treat others the way you'd like to be treated.
- Celebrate our diversity. Listen and be receptive to different points of view.
- Speak up if you see or suspect discrimination or harassment based on someone's race, color, gender, national origin, age, religion, citizenship status, disability, medical condition, sexual orientation, gender identity, veteran status, marital status or any other characteristic protected by law.
- Be civil, considerate and tolerant when engaging in political dialogue.
- Promote a work environment free of harassment, bullying and abusive conduct – whether physical or verbal. You can share your concerns with the assurance of knowing that the Company does not tolerate retaliation against anyone who reports in good faith.

WORKPLACE HEALTH, SAFETY AND SECURITY

We are committed to the safety of our employees and our communities. Every employee is empowered to stop unsafe situations, regardless of role, title or responsibility. Providing a safe and secure work environment for all of our employees is central to the success and reputation of our Company.

Health, safety, and security regulations vary in each of the locations where we operate. You are expected to know and follow all applicable health, safety, and security regulations, policies, and practices that apply to your position, cooperate with officials who enforce these regulations, policies, and practices, attend required training, and promptly report accidents, injuries, and unsafe practices and conditions.

We do not tolerate acts or threats of violence. Be alert to what is going on around you, observe good security practices, and speak up about any threats of potential violence. In order to enhance workplace security, you should be familiar with and follow any work safety information and training provided to you.

Any violations of health, safety and security regulations, policies or practices, or potential hazards should be promptly reported to your manager or supervisor, or your local safety committee, HR Department, or union representative. Failing to report violations can lead to significant harm to fellow employees and to the Company.



Eric Kaysen
Vice President, EH&S

"Safety is always on my mind and the safety of our employees is paramount. What everyone should recognize is that the same principles that support a culture of safety also support an ethical culture. You can't have one without the other. Valuing our employees, operating with integrity, speaking up when you have concerns and a commitment to excellence are all needed. That's a big part of what we mean when we talk about 'living our values' – not just as a company but also as individuals. Our workplace can't be "safe" or ethical without the active participation of every employee."



WE UNDERSTAND OUR RESPONSIBILITY TO OTHERS

The Company is committed to being a good corporate citizen.

- We do the right thing for the right reason, even when no one is looking.
- We treat all employees fairly, whether or not they choose to select collective bargaining representation, and will treat unions or works councils fairly.
- We strive to offer a workplace free from harassment or intimidation where all employees are treated with respect.
- We work hard so that our operations meet or exceed applicable local, state, and national environmental laws and regulations.
- We provide all required training so that our employees develop and improve their skills and knowledge and perform their jobs safely and in an environmentally sound manner.

HUMAN RIGHTS

We respect human rights.

We respect human rights in all aspects of our business. This commitment includes abiding by laws against human trafficking, forced labor, child labor, and other exploitive labor practices. We do not knowingly conduct business with any individual or company that participates in discrimination, the exploitation of children (including child labor), physical punishment, forced or prison labor or human trafficking. For more information, see our Modern Slavery Policy. Report any suspected human rights abuses in our operations or by any third-party conducting business on our behalf (e.g., business partners, distributors, and other company representatives) to your local HR Department representative or the Legal & Compliance Department. See “Where to go for Help” for additional options for making a report.

We are committed to fair employment practices everywhere we operate.

We comply with all equal employment laws and do not discriminate in our hiring or employment practices. We treat employees fairly whether or not they choose to select collective bargaining representation, and treat unions or works councils fairly. We abide by the labor laws in the countries where we operate. We strive to offer a workplace free from harassment or intimidation where all employees are treated with respect.

If you see or suspect labor law abuses or violations, please report them to your local HR Business partner or the Legal & Compliance Department.

ANTI-CORRUPTION AND ANTI-BRIBERY

A fundamental aspect of the Company's commitment to good corporate citizenship is to comply with all laws and regulations, including anti-corruption and anti-bribery laws.

The Company has a zero-tolerance policy towards bribery and corruption. The Company is committed to the highest ethical standards in all business transactions – conducting business throughout the world in accordance with all applicable anti-corruption and anti-bribery laws. Violations of these important laws carry significant consequences, including monetary penalties for both the Company and individuals involved, imprisonment, debarment, and reputational harm, among others. For more information, refer to the Company's Global Anti-Corruption Policy.

Living Our Values

- Know a bribe when you see one.
- Follow the laws and requirements of the countries where you work. Avoid even the appearance of something inappropriate.
- Set clear expectations and actively monitor the work of third parties doing business on our behalf.
- Be accurate and complete in recording payments and expenses.
- Speak up if you see or suspect a bribe.

GIFTS, MEALS AND ENTERTAINMENT

Giving or accepting reasonable gifts, meals and entertainment for legitimate business reasons is both customary and acceptable under our policies. However, it is not permissible to offer or accept such items if doing so improperly influences a business decision, creates a conflict of interest or creates a sense of obligation. You should also be mindful that accepting or giving these courtesies could create the appearance of a conflict. Additionally, you may not provide gifts, entertainment or meals to a government employee or official without first consulting the Chief Compliance Officer. For more information on these policies, see the Gifts, Meals and Entertainment Policy and the Global Anti-Corruption Policy.

FAIR COMPETITION AND ANTITRUST



Kerry Larkin
Director, Finished Lubricant Sales

"Good ethics are good business. Every employee at our company can and should aspire to be an ethical leader. At its heart, the message we share with and conduct in the marketplace must convey the basic values that we believe are important:

- *We treat our customers and colleagues with respect.*
- *We are always honest and compete fairly.*
- *Our products and services live up to our claims."*

The Company competes in a legal, prudent and ethical manner on the basis of the quality of our products and services. Fair competition laws are intended to prohibit practices that restrain trade or unduly limit free and fair competition. They often include provisions against conspiracies to fix prices as well as attempts to achieve or maintain monopoly power. We are committed to complying with fair competition and antitrust laws that apply in the markets in which we operate. Violation of antitrust laws can have serious consequences for the Company and the employees involved.

Living Our Values

- Do not discuss or agree on pricing or market allocation with competitors, whether explicitly or implicitly, including discounts, rebates or other components of price.
- Do not enter into any agreements with customers, suppliers, competitors, or others that are intended to unfairly limit competition. The Legal & Compliance Department must always be consulted well in advance before the Company agrees to participate in a consortium, joint venture, or any other cooperation agreement. Legal & Compliance Department review is also required before entering into joint purchasing agreements because there are situations where joint purchasing may be prohibited by antitrust laws.
- Never discredit competitors.
- Do not share information with a competitor about our customers and other third parties, pricing, or market strategies.
- Do not discuss any aspect of bidding with any of our competitors.
- Do not share current or future employee wage information with competitors.
- Do not enter into wage fixing or agreements not to poach employees of competitors.

Never discriminate unfairly in terms of price or services between similar customers. If you are unsure of appropriate practices, consult with the Legal & Compliance Department. For more information see our Antitrust and Competition Law Policy.

BID RIGGING

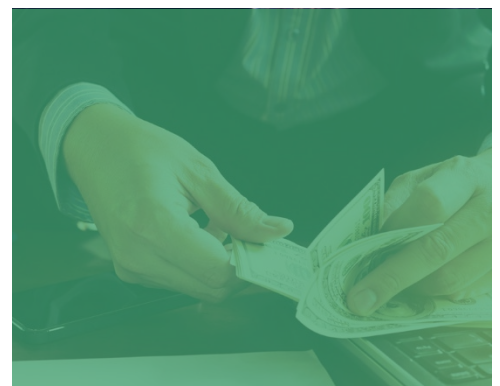
Bid rigging is coordination between competitors on prices or other terms in bids, allocation of bids, or coordination of behavior in bid procedures. Bid rigging is prohibited. You should know the laws, rules and regulations applicable to a particular bid before participating. You should not:

- Allocate bids with competitors.
- Agree that a potential bidder shall refrain from submitting a bid.
- Coordinate prices, calculations or terms in a bid procedure.
- Provide advantageous instructions to a particular bidder.

ANTI-MONEY LAUNDERING

Money laundering is the process of hiding illegal funds or making them look as though they are legitimate. It also covers the use of legitimate funds to support a crime. The Company is committed to combating money laundering and must avoid any activity that gives the appearance of serving as a conduit for money laundering. Never become involved in money laundering. Know who you are doing business with by following our Third Party Due Diligence Policy, and raise concerns where you see them.

Contact the Legal & Compliance Department for questions or more information about this area of the Code.



ACCURATE RECORDS

All of our organization's financial and other records must be accurate and complete. The Company's books and records must accurately reflect all Company funds, assets, and transactions, and be maintained and presented in accordance with both the laws and regulations of each applicable jurisdiction and with applicable accounting standards. By law, our management must attest to the accuracy of these documents and they must be audited regularly.

It is the responsibility of each employee to maintain, submit, approve, and authorize only clear, truthful, and accurate records. You must obtain approval from a person with the right level of approval authority for every transaction before carrying it out in accordance with our Corporate Delegation of Authority Policy.

Employees are expected to promptly report fraud and any improper or otherwise unethical accounting or auditing practices. If you have questions or concerns regarding the Company's books or records, contact your manager or supervisor, the Chief Financial Officer, or the Chief Compliance Officer. You may also submit your concerns using the Speak and Be Heard reporting line.

The Company's Records Management Policy sets forth specific document retention obligations that must be observed by all employees. Be sure to familiarize yourself with this Policy and how it applies to you. You must follow the document retention obligations that apply to you.



Indira Agarwal
Vice President, Controller and Chief Accounting Officer

"Our company's stakeholders—customers, suppliers and vendors, co-workers, management, investors and agencies who oversee our business—rely on the accuracy and timeliness of our records to make important decisions. Every one of us is responsible for truthfully and accurately recording information. Paperwork is not just routine. Accurate records are a critical part of our company's success."

EXTERNAL COMMUNICATIONS

External communications on behalf of the Company require a specialized understanding of legal, investor, and media issues. Only designated spokespersons are permitted to make public statements on behalf of the Company. Media requests should be referred to Corporate Communications and the Legal & Compliance Department. Analyst or investor inquiries should be referred to Investor Relations. Any presentations, papers, press release or other document presented outside the Company should be submitted to the Legal & Compliance Department for review and approval prior to distribution. For more information see our External Communications Policy.



Vaishali Bhatia
Executive Vice President and General Counsel

"Disclosing non-public material information, acting on such information, or recommending that others act based on the information is considered insider trading and may violate insider trading laws. The law governing insider trading is U.S.-based, however, the law applies to all employees of the company worldwide no matter where they reside or work. It also applies not only to information about our company, but also to information about other companies with whom we deal."

INSIDER INFORMATION AND TRADING

Insider trading is the practice of using material, non-public information to make or to recommend another person to make, trading decisions, as detailed in the Company's Insider Trading Policy. Material, non-public information ("insider information") is generally information that is not available to the general public and would reasonably be expected to have an effect on the value of a company's stock or that could influence someone to buy or sell stock.

Employees, executives, and directors, and their family members, members of their household, and any entities they control, are prohibited from the following:

- Trading, or recommending another person to trade, in Company securities (including, but not limited to, the buying or selling of HF Sinclair Corporation stock, Holly Energy Partners, L.P. units, and transactions in HF Sinclair Corporation stock in the HF Sinclair Corporation 401(k) Plan), based on material, non-public information;
- Engaging, or recommending another person to engage, in short-term, speculative trading in the Company securities;
- Hedging or pledging Company securities; or
- Sharing material non-public information with a third party (a practice generally referred to as "tipping").

If you have any questions about whether or not you have material, non-public information, or if the Company's pre-clearance requirements apply to you, you should consult the Legal & Compliance Department. For more information, see our Insider Trading Policy.

REMEMBER

- Insider trading allegations are routinely investigated and prosecuted in the United States by the U.S. Securities and Exchange Commission and in Canada by applicable provincial securities regulatory bodies.
- Regardless of where you live and work, you must comply with all laws prohibiting insider trading.



Matt Joyce

Senior Vice President, Lubricants and Specialties

“Our ethical culture encourages dialogue at all levels. Talk openly in your teams and with management about what you see happening and about how things could be better. Your questions, input and ideas are not only welcome, they are the key to our future success.”

GOVERNMENT AND TRADE CONTROLS

Work on Government or State-Owned Enterprise Contracts

Many countries place strict legal requirements on companies that do business with the government. When selling to, negotiating with or working with government customers, including state owned entities, it is critical that you abide by these requirements. These rules are often much stricter and more complex than those that govern Company sales to commercial customers.

If your work involves government contracts, you must know and follow the particular rules that apply to your work. Please refer to the Company’s Anti-Corruption Policy for additional requirements when working with government or state-owned enterprise customers.

Imports and Exports

The Company operates globally and, as a result, has to comply with special laws and regulations for the import and export of goods that support our business, products, technology and data.

Before engaging in any type of import or export, you must verify the eligibility of both the location of delivery and the recipient. You must also obtain all required licenses and permits, accurately complete all required documentation and pay all proper duties.

Boycotts and Restricted Countries

Many countries have adopted laws that impose restrictions on exports and doing business with certain countries, persons, or groups. These laws may include international treaties on export control as well as national and international economic and trade sanctions, anti-boycott and other laws. These laws are complex and change frequently.

In order for the Company to operate in full compliance with applicable local laws and international agreements, it is critical that employees familiarize themselves with — and adhere to — the Company’s Global Trade Compliance Policy. This is especially important for any employees involved with international sales (either directly or through a distributor or reseller), procurement and supply chain management, or the electronic transfer of data or technology.

Always seek advice from the Legal & Compliance Department if you have questions about an export transaction or if there is a risk that a transaction might involve a sanctioned country, person or group.

REMEMBER

There may be severe penalties, both criminal and civil, for failing to comply with import/export control regulations or sanctions rules. Individual employees may face fines and/or imprisonment. In addition to serious reputational harm, the Company may be subject to fines and may lose banking and import/export privileges.

USE OF COMPANY ASSETS

The Company's Technology and Electronic Communications

You must safeguard the Company's proprietary information and data, as well as the technology (such as computer systems and applications) this information is stored on, from damage, alteration, theft, fraud and unauthorized access. To achieve this goal, you must follow the specific security measures and internal controls in place for the systems to which you have access.

You must not use the Company's technology or systems (including computers, phones and other electronic devices that have access to the Internet) to download or transmit discriminatory, sexually explicit or other statements or materials that could be construed as threatening, defamatory, or harassing. In addition, you must not use these technologies or systems to access illegal material, send unauthorized business or charitable solicitations or conduct non-Company related commercial business.

Unless prohibited by any local laws, regulations or policies, the Company expects any personal use of Company equipment and communications to be occasional, incidental and limited. The Company **strongly** encourages that whenever possible you use personal devices, rather than Company assets, for personal matters. This will protect the Company's data, and your own, and will also help to make sure that the bandwidth that carries traffic between the Company and the internet is fully available for business use. For more information, refer to the Company's Acceptable Use of Technology Assets Policy. Also see the Company's Employee Manual for specific policies for your location regarding the personal use of Company equipment and communications.

The Company's Physical Property

The Company trusts us to respect and care for its physical property, to the best of our ability, at all times. Physical property includes Company funds (including credit cards), facilities, furniture, equipment and communication systems. We should work together to prevent theft, destruction or misappropriation of all Company physical assets.

You must never use Company property for your own personal gain or for the benefit of another person, except to the extent that it is approved in writing by the Legal & Compliance Department.



Joe Fronzaglio
Vice President and Chief Information Officer

"Information and data are the life blood of our company. If data is lost, misused or disclosed improperly, either on purpose or accidentally, the consequences can be wide ranging. The proper handling of company data and information is important. In some instances, individual privacy rights can be at stake, too. To achieve the necessary level of data privacy and security everyone has to do their part."

DATA PRIVACY AND CONFIDENTIAL INFORMATION

You must safeguard the Company's proprietary information and data, as well as the technology (such as computer systems and applications) this information is stored on, from damage, alteration, theft, fraud and unauthorized access. To achieve this goal, you must follow the specific security measures and internal controls in place for the systems to which you have access.

Information is a critical asset. Confidential information and intellectual property represent the outcome of significant Company investment and years of hard work. When you help protect the Company's trade secrets, patents, copyrights, trademarks, business plans, engineering ideas, databases and customer lists, you help protect our competitive advantage.

All employees, and anyone acting for or on behalf of the Company, must preserve the confidentiality of the Company's proprietary and confidential information and data, including intellectual property, and ensure that the information and data are kept confidential and secure, both during and after your employment.

External Party Information

We also have an obligation to safeguard the confidential information of those with whom we do business.

You must ensure we comply with the Company's confidentiality agreements with third parties, and you must never share a third party's confidential information with another company, or with a colleague who doesn't have a business need to know it. Equally, you must make

sure that external parties with whom we do business who need access to the Company's confidential information only receive it after signing a confidentiality agreement. If a government agency requests that you provide them with confidential information you received from a third party, contact the Legal & Compliance Department before providing any information.

Keep Private Information Private

We are committed to collecting and processing personal information in accordance with applicable global laws and regulations. We only collect, process and maintain personal information for specific and legitimate purposes and in a transparent manner. It is important that personal information be stored, processed, or transferred securely and that access to such information is limited to those who need such information for legitimate and necessary business purposes.

Equally, external parties with whom we do business who handle personal information for us must follow the Company's privacy policies, security standards and external party risk management processes.

If you are involved in the collection, storage, transfer or use of personal information, you must learn the legal and policy requirements that apply to your activities. Follow our policies and protect any personal information that is entrusted to you. Use it only in the way it's meant to be used and don't share it with anyone inside or outside of the Company in an unauthorized manner.

Cybersecurity is equally important. Make sure you follow the processes and practices we have in place to protect our networks, computers, programs and data from attack, damage or unauthorized access.

If you believe personal information of any individual has been disclosed or used inappropriately, you must promptly contact the Legal & Compliance Department or send us an email at dataprivacy@hfsinclair.com immediately.

Failure to do so could subject the Company to fines and/or regulatory action. For more information, refer to the Company's Global Privacy Policy.





Val Pompa
Executive Vice President, Operations

“Understanding how conflicts of interest at work may differ from your personal life is important. Referring or engaging a contractor in which you have a personal, professional or financial interest is a conflict of interest. Accepting a reward for the referral is a kickback. Many of us may have potential conflicts of interest, but the key to successfully managing these is transparency. Disclosing a concern, the relationship, or a potential conflict early is the best way to protect you, our company and our business.”

CONFLICTS OF INTEREST

We don’t let private interests or personal activities or relationships affect business decisions we make on behalf of the Company.

A conflict of interest exists when the prospect of personal interest or activity interferes or appears to interfere with the duties that you perform at, or owe to, the Company. A conflict of interest may unconsciously influence even the most ethical person and the mere appearance of a conflict may cause your acts or integrity to be questioned. It isn’t possible to list every situation that could present a conflict, but there are certain situations where conflicts typically arise – and being able to recognize a potential conflict can help you avoid one.

You should never use your position at the Company for inappropriate personal gain or advantage, either for yourself or a friend or family member. When making decisions related to the Company, you have a duty to act in the Company’s best business interests and avoid even the appearance of a conflict. Executive officers, directors, director nominees and their immediate family members are also required to comply with the Company’s Related Party Transaction Policy and should follow the procedures set forth therein prior to engaging in any transaction with the Company and its subsidiaries.



Living Our Values

- Know a potential conflict when you see one. A conflict can happen when:
 - You supervise or conduct business with someone with whom you have a personal relationship.
 - You invest in one of our suppliers, customers, business partners or competitors.
 - You own or do work for a company that competes, does business or wants to do business with our Company. Serving in an advisory role or on the board of directors for such a company can also pose a conflict.
- Remember, it's not possible to list every potential conflict of interest scenario; if you're not sure if a situation represents a conflict ask the Legal & Compliance Department.

Required Disclosure

If you become aware of a situation that could compromise – or even appear to compromise – your objectivity or your ability to make impartial business decisions, disclose it immediately to your manager or supervisor, the local HR Department representative or the Legal & Compliance Department. Many conflicts can be easily avoided or addressed if they are promptly disclosed and properly managed.

Political Activity

Our Company supports and encourages employees to actively participate in their communities. This includes participation in political activities outside of the workplace. Certain activities may need to be reviewed and approved through the Company's conflicts of interest process. Additionally, when engaging in such activities, employees are not permitted to use Company resources (including equipment, personnel, supplies or communication tools) in support of those activities and employees must make it clear that their views and actions are their personal ones, and not on behalf of the Company.

Serving in an elected or appointed government role can present specific ethical and legal challenges. Employees who are interested in serving in such a capacity must consult with their supervisor, the Government Affairs Department and the Chief Compliance Officer prior to accepting such roles.

The Company allows its employees to contribute personal funds and their personal time to support candidates and causes of their choice; however, employees are not allowed to make political contributions on behalf of the Company. Eligible employees, as well as our directors, may also contribute to the HF Sinclair Political Action Committee (“DINO PAC”). The DINO PAC is a political action committee registered with the Federal Election Commission and maintained by HF Sinclair Corporation. It makes political contributions to political parties and political candidates at the local, state, and federal level. The DINO PAC complies with all applicable laws concerning political contributions, including public disclosure laws. The Company does not fund the DINO PAC beyond administrative support as permitted under federal law. The DINO PAC is managed by the Director of Government Affairs.

Lobbying activities are highly regulated. All lobbying activities on behalf of the Company must be coordinated through the Government Affairs Department and done in compliance with applicable laws.

Political conversations in the workplace must take place in a civil, respectful and tolerant manner and must not interfere with productive work, infringe on the civil rights of others or harm our organization’s brand or reputation. We must always make it clear that we are sharing our personal views rather than those of the organization.

EXPANDING INTO NEW REGIONS OR INDUSTRIES

When considering an expansion into a new region or a new market that may expose the Company to new regulations, oversight, and/or tax implications (including, but not limited to, creating a branch office or subsidiary, hiring employees in a new country, or significantly increasing or altering the nature of our activity in a region), you must consult with the Legal & Compliance Department and the Tax Department at the beginning of the exploratory process and those departments must be properly represented on the team evaluating the new project.



ENGAGING THIRD PARTIES

The Company conducts due diligence on third parties to ensure that their reputations and backgrounds are appropriate and meet the Company's standards.

Conducting due diligence minimizes risk by helping us avoid relationships that may implicate the Company through misconduct of business partners.

No employees may contractually commit the Company to do business with a third party before due diligence has been performed. Requisite due diligence will be conducted where appropriate by the Legal & Compliance Department with the assistance of the business unit that requests to do business with a particular third party.

Business should not be conducted with a supplier, business partner, or other third party that may subject the Company to criminal or other liability or cause reputational harm.

A third party acting on the Company's behalf should not engage in conduct that the Company would not do itself.

Details regarding the due diligence process may be found in our Third Party Due Diligence Policy.





Atanas Atanasov
Executive Vice President and Chief Financial Officer

"Our culture—how we interact with each other—matters. Sometimes, we think that our individual actions won't make much of a difference. Our responsibilities aren't big enough to affect the whole company, or that it is up to management to drive our culture. Management does play an important role, but each of us is responsible for creating our culture"

COMPLIANCE

Reports of possible violations of this Code, laws, regulations, or other concerns that are reported to the Legal & Compliance Department shall be reviewed as confidentially as possible under the direction of the Chief Compliance Officer in an independent and unbiased manner. Significant investigations will be reported to the Chairperson of the Audit Committee of the applicable Company's Board of Directors (the "Board"). The Company's Corporate Compliance Program Charter governs the activities of the Company's Legal & Compliance Department with respect to such reports.

Any waiver of any of the provisions of this Code for any executive officer or director may be made only by the Board or the Audit Committee of the Board. Any such waiver must be promptly disclosed to shareholders in accordance with the applicable rules of any stock exchange on which the Company's securities are traded as well as in accordance with the rules and regulations of the United States Securities & Exchange Commission.

THIRD PARTY CONTACT

Please contact the Legal & Compliance Department immediately if you receive non-routine communication or visits from government authorities, public officials, investigators, insurance adjusters, members of the media, or lawyers who do not work for the Company. With the exception of the Board and its committees, only the Legal & Compliance Department is authorized to engage outside counsel for the Company.



WHERE TO GO FOR HELP

There are people ready to support you.

Have a question, problem or a concern? In most cases, your manager or supervisor should be your first point of contact. If you're uncomfortable speaking with your manager or supervisor, or if you have already shared a concern and feel it's not being addressed appropriately, reach out to the HR Department or another member of management. The Legal & Compliance Department and/or the Chief Compliance Officer are also available at any time and can be reached at 214-871-3555 or compliance@hfsinclair.com.

The Speak and Be Heard reporting line is another resource available to you. Operated by an independent reporting service, you may contact the Speak and Be Heard reporting line, via telephone or online, to speak up with questions or concerns of violations of the Company's Code, policies, procedures or the law. The Speak and Be Heard reporting line is available 24 hours a day, seven days a week. You may choose to remain anonymous.



speakandbeheard.ethicspoint.com



BY PHONE:

1-844-893-1072	(US)	0800-90-5372	(France)
0800-017-863	(Austria)	0800-182-1201	(Germany)
0800-7-9569	(Belgium)	800-681-6920	(Mexico)
0800-000-0362	(Brazil)	0800-023-2938	(Netherlands)
1-844-992-4850	(Canada)	1-800-1-322-0399	(Philippines)
400-120-0406	(China)	800-852-3313	(Singapore)
		0800-949-6908	(United Kingdom)



When you contact the Speak and Be Heard reporting line – whether by telephone or online – a web-based form will document the information you share, and it will be released to the Company to ensure that the individuals with appropriate expertise can effectively respond to the question or concern. Rest assured, the Company takes this process very seriously and will strive to maintain the confidential nature of your submission. After reporting your question or concern, you will receive a case number that will be your reference should you want to check back in and receive status updates regarding your submission.

Related Policies and Procedures:

Acceptable Use of Technology Assets
Antitrust and Competition Law Policy
Corporate Compliance Program Charter
Employee Manual
Gifts, Meals and Entertainment Policy
Global Anti-Corruption Policy
Global Privacy Policy
Global Trade Compliance Policy
Insider Trading Policy
Records Management Policy
Related Party Transactions Policy
Third Party Due Diligence Policy



HF Sinclair Corporation (NYSE: DINO)

HF Sinclair Corporation (“HF Sinclair”), headquartered in Dallas, Texas, is an independent energy company that produces and markets high value light products such as gasoline, diesel fuel, jet fuel, renewable diesel and other specialty products. HF Sinclair owns and operates refineries located in Kansas, Oklahoma, New Mexico, Wyoming, Washington and Utah and markets its refined products principally in the Southwest U.S. and the Rocky Mountains, extending into the Pacific Northwest and in other neighboring Plains states. HF Sinclair supplies high-quality fuels to more than 1,300 Sinclair branded stations and licenses the use of the Sinclair brand at more than 300 additional locations throughout the country. In addition, subsidiaries of HF Sinclair produce and market base oils and other specialized lubricants in the U.S., Canada and the Netherlands, and export products to more than 80 countries. Through its subsidiaries, HF Sinclair produces renewable diesel at two of its facilities in Wyoming. HF Sinclair also owns a 47% limited partner interest and a non-economic general partner interest in Holly Energy Partners, L.P. (“HEP”), a master limited partnership that provides petroleum product and crude oil transportation, terminalling, storage and throughput services to the petroleum industry, including HF Sinclair subsidiaries.

