

California Transparency in Supply Chains Act Disclosure

(California Civil Code §1714.43 – SB 657)

Last Updated: May 15, 2026

Introduction

HF Sinclair Corporation and its direct and indirect subsidiaries and affiliates (collectively, “HF Sinclair”, “we” or “our”) are committed to conducting business in compliance with applicable laws and regulations and in accordance with the highest standards of business ethics and integrity. We recognize the importance of respecting human rights and are committed to preventing and mitigating the risks of human trafficking and modern slavery in all aspects of our business, including within our supply chains.

HF Sinclair operates seven complex refineries across the United States and maintains production facilities in Canada and the Netherlands. The company conducts operations through five reporting segments – Refining, Lubricants and Specialties, Marketing, Renewables and Midstream – with activities principally located in the United States, Canada, and the Netherlands. HF Sinclair markets products in the United States, including California, and in certain other countries. This disclosure is made pursuant to the California Transparency in Supply Chains Act (SB 657) and describes the measures we take—or do not take—to address risks of human trafficking and modern slavery associated with the production, transportation, storage and commercialization of refined petroleum products and petroleum-based derivatives, including gasoline, jet fuel, lubricants and other specialty products.

HF Sinclair sources materials and services from a diverse range of suppliers, including maintenance contractors, equipment manufacturers, IT software providers, distributors, and raw material suppliers. Sourced products include, but are not limited to, raw materials, chemicals, machinery components, steel, office supplies, and IT software. Products are procured from various countries based on cost and availability. Raw materials, including crude oil and feed stocks, account for more than seventy percent (70%) of HF Sinclair’s total procurement spend.

1. Supply Chain Verification

HF Sinclair has implemented risk-based due diligence procedures to review the background, business capabilities, and reputation of its prospective business partners in order to mitigate risks of modern slavery. In evaluating supply chain risk, HF Sinclair assesses the various categories of suppliers in its supply chain; the level of spend in each category; whether the sourcing is direct or indirect; and whether the sourcing involves products or countries with a higher risk of unethical labor practices. Our approach to mitigating risk involves certain compliance activities applicable to all

suppliers and enhanced efforts for suppliers who present higher risk, primarily based on geography and spend. Suppliers who present a higher risk are required to undergo a detailed assessment. This includes completing an annual questionnaire and certification regarding their practices with respect to mitigating modern slavery risk. As appropriate, HF Sinclair reviews these certifications and questionnaires with and addresses any gaps in compliance directly with the supplier.

Our risk-based due diligence procedures are conducted internally by HF Sinclair personnel, with support from third-party information sources where appropriate.

We believe that the nature of our business, products, and suppliers presents minimal risk of slavery and human trafficking in our supply chain. We do not implement any formal third-party human trafficking certification program.

2. Supplier Audits

We may conduct audits or assessments of certain suppliers as part of safety, security, environmental, and operational reviews, or in the execution of contractual compliance and performance management processes.

We do not currently conduct routine, independent, or unannounced audits specifically focused on human trafficking or forced labor across our supply base.

3. Supplier Certifications

We use supplier contracts and purchase agreements to set expectations regarding lawful and ethical conduct. We also have a Supplier Code of Business Conduct and Ethics, and we require all our suppliers to follow it.

Our suppliers are required, contractually or through our Supplier Code of Business Conduct and Ethics, to comply with all applicable laws, including labor and employment laws in the jurisdictions in which they operate.

We currently require our top direct suppliers by volume to provide a separate certification specifically attesting to compliance with laws concerning modern slavery, including child labor, forced labor, human trafficking, debt bondage and involuntary servitude.

4. Internal Accountability Standards

We maintain internal policies and procedures designed to promote ethical conduct across our operations and supply chain relationships.

HF Sinclair employees are required to comply with our Code of Business Conduct and Ethics and other applicable policies addressing legal compliance and ethical behavior.

Violations of HF Sinclair policies by employees may result in disciplinary action, up to and including termination.

Supplier non-compliance with legal requirements, contractual obligations or ethical expectations may result in corrective action, suspension, or termination of the business relationship, depending on severity.

5. Training

We provide training to employees in areas relevant to their job responsibilities.

All employees receive annual training and must certify their understanding of our Code of Business Conduct and Ethics.

We do not currently provide standalone training programs dedicated exclusively to identifying or mitigating human trafficking and forced labor risks within the supply chain.

6. Scope and Limitations

This disclosure applies to HF Sinclair's direct supply chains for tangible goods and does not extend to indirect suppliers beyond first-tier service providers that are not engaged in the manufacturing or delivery of tangible products, nor does it apply to joint ventures or other entities not controlled by HF Sinclair.

7. Continuous Improvement

We recognize that approaches to supply chain transparency and the promotion of human rights continue to evolve. Accordingly, we regularly review our policies, procedures, and disclosures with a view to identifying opportunities for improvement and remaining aligned with evolving regulatory requirements and relevant industry practices.

8. Contact Information

Questions regarding this disclosure may be directed to:

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