

Code of Business Conduct and Ethics

It starts with you.



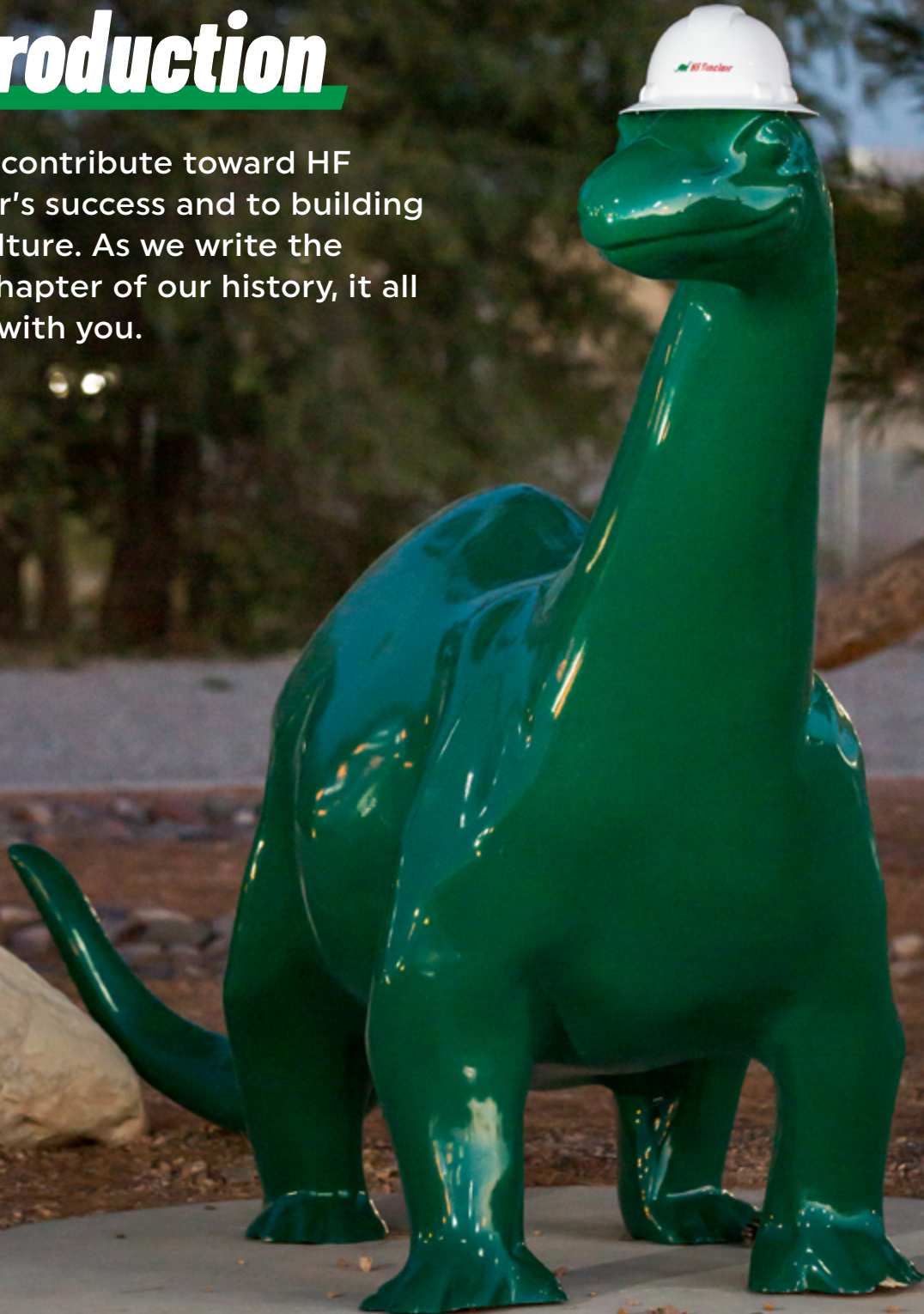
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HF SINCLAIR BRANDS

Introduction

We all contribute toward HF Sinclair's success and to building our culture. As we write the next chapter of our history, it all starts with you.





Message from Franklin Myers

Our behaviors can impact our colleagues, our external stakeholders and how we do business. Therefore, we all have a role to play in upholding the reputation and integrity of our business and fostering positive relationships by living our values. We hold an important role in our communities and for our customers, providing essentials for everyday life, and it's important that we achieve this the right way. What sets us apart is not only our business's diversity, but also our employees' dedication and integrity.

This Code of Business Conduct and Ethics sets forth our values and a roadmap for ethical principles that are to be applied each and every day.

We all contribute toward HF Sinclair's success and to building our culture. As we write the next chapter of our history, it all starts with you.

Thank you,

Essentials for modern and future life.

HF Sinclair is an evolving energy company with an enduring family of brands providing fuel and specialty products that are essential to modern and future life.

Based in Dallas, Texas, we operate seven complex refineries across the U.S. and production facilities in Canada and the Netherlands. With more than 5,000 employees, we export products to more than 80 countries.

Today, our brands provide traditional and renewable fuels and lubricants for planes, trains and automobiles, in addition to other products that power our way of life, such as asphalt, roofing tar, and components for medicines and cosmetics. Our products form the building blocks for plastics, polymers and polyesters.

We make the products that make life go.



Our values make our culture go.

Culture is the foundation of everything we do. Our culture starts with our values.

These values reflect the behaviors that have helped write HF Sinclair's rich history of growth and transformation. Every day, these values power us forward. From the earliest stages of our history, our culture has evolved organically. Together, we can continue our commitment to the core values that made our culture what it is today.

Our values guide how we work, how we interact with each other, the decisions we make and how we put them into action.

A person wearing a blue work shirt is holding a white hard hat. The background is a blurred outdoor setting with greenery and a bright light source, possibly the sun, creating a bokeh effect.

One HF Sinclair Code of Business Conduct and Ethics

We believe in a culture where all employees feel respected and included. For this culture to thrive, it is up to each employee to speak up when something does not feel right.

While HF Sinclair has a diverse family of brands, it has one culture and one Code. Our Code is an extension of our values. It provides a high-level overview of the laws, regulations and company policies that apply to all of our employees, executive officers and directors and to the work we do. Following our Code can help build trust with our customers, community and stakeholders, and honors our shared vision of who we are and how we work.

When you think about how to follow our Code, imagine the people you like the most, from loved ones you respect to public figures you admire. Think about what values they embody, what actions they take and what behaviors they exhibit. Chances are, those three characteristics will be entirely consistent with one another. Our Code provides a model for every employee to live HF Sinclair's values of safety, integrity, teamwork, ownership and inclusion.

Speak Up

The Code cannot address every situation you may encounter. If you have questions about the Code, or if you suspect or identify any violation of the law, the Code or any HF Sinclair policy, speak up. You may report your concern anonymously. The more detail you provide, the easier it will be for us to review the issue and develop a solution. HF Sinclair takes all concerns seriously and addresses them fairly and promptly.

There are several reporting channels available:



Your direct supervisor or manager



The Speak and Be Heard **online reporting** tool or reporting hotline (for U.S., call 844-893-1072; for other countries, consult the online reporting tool for alternate phone numbers)



The HR department



The Legal & Compliance department

Often, your supervisor or manager may be able to help you. Other times, you may have a question or need advice on a particular topic and want to speak with somebody else. We believe in a culture where all employees feel respected and included. For this culture to thrive, it is up to each employee to speak up when something does not feel right.

HF Sinclair will not tolerate any form of retaliation against an employee for reporting a violation or potential violation of our Code, policies or any applicable laws and regulations in good faith. We are one HF Sinclair team, working towards the same goals.

The HF Sinclair Board of Directors must approve any waiver or variance of our Code involving executive officers or directors and promptly disclose such decisions in accordance with applicable regulations.



How Reports are Managed at HF Sinclair

01

The Company receives a report from any of the multiple reporting channels, classifies it and - if warranted - assigns it for investigation

02

An impartial investigator determines facts through interviews and document review

03

The investigator documents the conclusions and, when necessary, makes a recommendation for corrective actions

04

The appropriate level of management makes a decision and implements corrective actions



Potential Consequences of Code Violations

HF Sinclair may take disciplinary action, up to and including termination, against any employee who violates our Code or applicable laws, regulations or policies. Failure to report misconduct or intentionally reporting misleading information violates our Code and may also result in disciplinary action.

Our Values



Safety

Safety is our number one priority. We strive for Goal Zero.

When we work together as a team, the opportunities and outcomes are even more rewarding. We are one team. We work collaboratively to reach our goals.



Teamwork

Sustainability

Fair Competition

Information Security

We respect and actively seek diverse points of view, realizing we can learn from each other. We respect human rights and respect each other.



Inclusion

Respect

Labor, Employment + Immigration Requirements

Each of us must make impartial, objective business decisions that are in the best interest of HF Sinclair.

Integrity



Conflicts of Interest

Corruption

Trade

Improper Gifts

Third Party Relationships

Financial Records

We encourage you to Step Up and Stand Out. Bring your ideas and your ambition, and watch how far they can take you.

Ownership



Communication

Asset Protection

Insider Trading



Safety

Safety is our number one priority. We strive for Goal Zero.

We maintain a culture of safety to protect our employees, communities and the environment. From the top down at HF Sinclair, safety is our number one priority and a culture in which everyone plays a part. We drive toward achieving Goal Zero, which embodies our belief that all safety events are preventable. This requires a multi-layered approach to setting and monitoring safety goals rooted in rigorous and regular safety training, which we support and commit to. Safety is our number one priority.

We strive for Goal Zero.

We have a vital interest in the health and welfare of our employees, and a goal of providing a safe, healthy, drug- and alcohol-free environment.

Using and being under the influence of alcohol, drugs or any unauthorized substance while at the workplace is strictly prohibited.



Integrity

Each of us must make impartial, objective business decisions that are in the best interest of HF Sinclair.



We commit to a culture of integrity and authenticity across the organization. We strive to create a safe environment where you are encouraged and supported to raise concerns, share and learn. Our long-standing commitment is to conduct business with integrity, authenticity and in an ethical manner. Your role is fundamental to our good name and our role as a good corporate citizen.

We speak up. We listen. We do the right thing.

Avoid and Disclose Conflicts of Interest

Each of us must make impartial, objective business decisions that are in the best interest of HF Sinclair. We want our employees to succeed both inside and outside of the company and respect the right of our employees to pursue activities outside of HF Sinclair. Those activities, however, must not negatively impact or conflict with HF Sinclair's business or our customers, or otherwise interfere with your duties as an employee.

A conflict of interest may exist when an opportunity for personal, financial, social or political gain could influence an employee's objective business decision-making. If you think an activity outside of HF Sinclair may appear to create a conflict, disclose it.



Examples of potential conflicts include:

01 Hiring or supervising someone with whom you have a close relationship.

02 Influencing supplier selection decisions involving a close friend or family member.

03 Working or consulting for an HF Sinclair competitor.

04 Owning or having decision-making authority in an HF Sinclair competitor or a vendor that does business (or seeks to do business) with HF Sinclair.

05 Receiving personal payment from a supplier.

06 Taking advantage of corporate opportunities that belong to or are presented to HF Sinclair.

07 Using confidential information for your personal benefit.

08 Holding an elected or appointed public office.

09 Exchanging gifts or hospitality with a third party that does or seeks to do business with HF Sinclair.

The Legal & Compliance department can help you resolve potential conflicts of interest provided you disclose them. If you think you may have a conflict of interest, seek guidance from the Legal & Compliance department, and we will solve the problem together. See related information¹.

Zero Tolerance for Corruption

We win business the right way. We never offer, promise, give or accept money or anything of value to or from third parties in exchange for an improper business advantage. We must comply with anti-corruption and anti-bribery laws wherever we do business.

We maintain accurate and transparent books and records to document all payments properly. We properly select third parties and have procedures and processes to carefully screen any third party or business partner that may interact with a foreign government official on HF Sinclair's behalf. We hold these third parties and business partners to the same standards that we hold ourselves and prohibit them from doing anything improper on our behalf or for our benefit. See related policy².

HF Sinclair funds or assets must not be used for political purposes without obtaining the required approval.

Respect Trade Controls

HF Sinclair is subject to U.S. and international laws and restrictions based on economic sanctions against certain individuals, entities and countries. We must follow HF Sinclair's procedures and controls to make sure we do not engage in business dealings with, and that our products are not delivered to, these individuals, entities and countries, either directly or indirectly. When we import or export products, we must always accurately classify, value, determine country of origin, and specify all facts reportable to customs authorities. See related policy³.

Do Not Exchange Improper Gifts or Entertainment

Providing and receiving gifts and entertainment can foster goodwill and strengthen business relationships, but we must never use gifts or entertainment to improperly influence a business decision or otherwise create a conflict of interest. Gifts and entertainment should always be reasonable under the circumstances and serve a legitimate business purpose. See related policy⁴.

Gifts and entertainment must meet the following criteria:

Modest in value

Not offered for any improper purpose

Not cash (or cash equivalent)

Does not violate any law or HF Sinclair policy

Foster Business Partner and Third-party Relationships

We select third parties objectively and treat them fairly. We expect our suppliers, vendors and other third parties who work with us to embrace our commitment to integrity and to behave in compliance with applicable laws and with the principles stated in our Code. We have controls and processes in place to identify third parties who may pose risks to our reputation, such as conducting illicit transactions or laundering funds. Our efforts to identify these risks and promote effective controls depend on each of us working to remain vigilant and understand the risks posed by third parties and business partners. See related policy⁵.

Maintain Accurate Financial Records

Accurate and transparent books and records are critical to managing our business. HF Sinclair maintains a system of internal controls to comply with applicable legal, tax and other regulatory requirements. Each of us is responsible for making sure our records are complete, accurate and timely. Never misrepresent or falsify any information in our books and records or assist or allow others to do so. If you become aware of or suspect a violation of our internal controls or record retention policies, report it. HF Sinclair expects employees to uphold the integrity of our financial reporting, forecasts and publicly disclosed business information.

If you are ever involved in an internal audit or investigation, cooperate fully and provide complete, accurate and timely responses to questions and document requests. If you are ever involved in an external audit or investigation, contact the Legal & Compliance department for guidance. If Legal & Compliance asks you to retain records, do so until they tell you retention is no longer necessary. See related policy⁶.

Each of us is responsible for making sure our records are complete, accurate and timely.





Teamwork

When we work together as a team, the opportunities and outcomes are even more rewarding. We are one team. We work collaboratively to reach our goals.

We encourage a working environment that supports collaboration and bold thinking. We encourage growth and exciting possibilities by championing a culture of teamwork and open communication. When we work together as a team, the opportunities and outcomes are even more rewarding. We are one team. We work collaboratively to reach our goals.

Collaborate in Support of Sustainability

We want to support affordable, accessible energy for generations to come – which means responsibly refining hydrocarbons while also producing clean, affordable renewables to meet growing demand. As part of this effort, HF Sinclair seeks to promote a shared-value approach to environmental, social and governance issues. We are committed to operating in a sustainable way to better serve our stakeholders for the long term.



Compete Fairly

We compete fairly and comply with all applicable competition laws. Each of us should avoid discussing any of our business strategies or plans outside of HF Sinclair, even informally. See related policy⁷.

Secure Our Employee and Customer Information

Our customers, employees and vendors trust HF Sinclair with their information. We must manage that data appropriately and respectfully, consistent with our legal obligations and our mission to build trust with our customers and other stakeholders. We should collect data that we need to perform our jobs and keep it only as long as necessary for that purpose.

We use data in accordance with applicable laws and regulations. We are transparent and honor individual choice, and if we want to use data differently, we follow legal requirements for consent. And we never use anyone's data for personal benefit. When we share data outside the company, the recipient must share our commitment to privacy. We believe data protection is a key ingredient of our success and maintaining our customers' trust. Managing data appropriately is everyone's job. See related policy⁸.



HF Sinclair Technology Tips

- 01** Use HF Sinclair-approved applications to send confidential information.
- 02** Save confidential information using HF Sinclair-approved tools, not personal laptops or portable devices.
- 03** Never share non-public information on the internet or social media.
- 04** Lock unattended work devices and avoid leaving devices in vehicles.
- 05** Don't leave confidential information on printers or whiteboards.
- 06** Avoid viruses and malware; do not click on suspicious attachments or links.
- 07** Do not download software that HF Sinclair has not approved.
- 08** Never share your HF Sinclair password with anyone and do not use it for multiple accounts.
- 09** Always be aware of what's on your screen while in public locations where someone might be able to see it.

Ownership

We encourage you to Step Up and Stand Out. Bring your ideas and your ambition, and watch how far they can take you.



We nurture an environment that encourages employees to view themselves as owners and to take responsibility. Ownership is a mindset. We maintain a willingness to learn, to look forward to new challenges and build opportunities for ourselves and those around us. We encourage you to Step Up and Stand Out – to bring your ideas and your ambition and watch how far they can take you. We support entrepreneurial spirit and unlocking our employees' potential. We hold ourselves accountable for our operations and efforts, and we reward our employees for their contributions.

Be careful when speaking with third parties, including competitors, at conferences or industry events and never enter into any agreements without specific authorization.

Communicate Responsibly

We know employees may use social media to connect with others and to express themselves. If you share your views about topics that are related to or may impact our business, including political views, make sure to disclose that you work for HF Sinclair and indicate that your views are your own and not of the company. Never discuss or promote anything about HF Sinclair that is not already publicly available. If you see something negative about HF Sinclair online, do not respond on behalf of HF Sinclair. Only authorized HF Sinclair representatives may speak on our behalf. We speak with one voice in order to protect our brand. See related policies⁹⁺¹⁰.



Protect HF Sinclair Assets

We are extremely proud of what we have built at HF Sinclair. Each of us should protect the tools the company gives us to do our work. The same goes for company emails and technology tools—we should all use these resources responsibly. Each of us has a responsibility to protect HF Sinclair by following applicable information security policies, software licensing agreements and document retention policies. HF Sinclair accesses and monitors information stored and transmitted on HF Sinclair devices and other equipment used for HF Sinclair business. If you see theft, misappropriation, waste or misuse of our resources or property, report it. See related policy¹⁰.

Do Not Engage in Insider Trading

Some of the information that we communicate internally is not public, and we cannot share it outside of HF Sinclair. HF Sinclair must comply with federal securities laws in the U.S., which impose requirements regarding how and when HF Sinclair may share material non-public information. Using non-public information for personal benefit or sharing it with others for trading purposes may constitute illegal "insider trading."

Never share material non-public information with anyone, including family and friends. Only share information with colleagues within HF Sinclair when they need to know something to do their job. If you need to share confidential information with a third party as part of your job, make sure the party receiving the information has signed a non-disclosure agreement or is otherwise required to keep the information confidential, consistent with our policies and legal requirements.

Our intellectual property, business plans, sales data and strategy are important assets. You should assume all HF Sinclair information and intellectual property is confidential unless HF Sinclair publicly discloses it. See related policy¹¹.

Using non-public information for personal benefit or sharing it with others for trading purposes may constitute illegal "insider trading."

Inclusion

A woman with dark hair, wearing safety glasses, a tan lab coat over a pink hoodie, and black gloves, is focused on her work in a laboratory. She is holding a test tube over a white rack containing several other test tubes with red caps. The background is a blurred laboratory setting with various pieces of equipment.

We respect and actively seek diverse points of view, realizing we can learn from each other. We respect human rights and respect each other.

We foster a culture of inclusion by encouraging diversity of experiences, viewpoints and backgrounds. We insist on a culture of respect and recognize that words and actions matter. We respect and actively seek diverse points of view, realizing we can learn from each other. We foster an inclusive culture and provide opportunities for all employees to be innovators. We value and expect an inclusive working environment. We recognize that we are all responsible for fostering an inclusive culture.

Respect Each Other

HF Sinclair prohibits any form of harassment in our workplace and discrimination in employment, employment-related decisions, or in business dealings on the basis of an individual's race, color, ancestry, age, sex, sexual orientation, gender identity, religion, disability, ethnicity, national origin, veteran status, marital status, pregnancy or any other category protected by law or local policy. This type of conduct can hurt our fellow employees and impact the success of our business.

We do not tolerate any form of harassment, bullying or offensive conduct (including threats of violence) which diminishes anyone in any way.

HF Sinclair is committed to a workplace free of sexual harassment, and we hold every employee responsible for preventing sexual harassment. Sexual harassment may include unwanted touching or sharing materials with sexual content, making uninvited remarks of a sexual nature, initiating romantic advances from a position of authority or continuing to make romantic advances after being refused. Anyone may be impacted by offensive conduct (not just the person harassed). If you witness or experience this type of conduct, speak up and report it. See related procedure¹³.



Follow Labor, Employment and Immigration Requirements

We respect human rights, including freedom of association, and comply with all labor, employment and immigration laws in the countries in which we operate. We do not tolerate the use of child, forced, indentured or involuntary labor anywhere we do business, and we only work with others who adhere to human rights principles and uphold labor and immigration laws. We also require all employment agencies, contractors, suppliers and others doing business with us to comply with applicable immigration laws. We are each responsible for our immigration and employment status in the countries where we work and live. See related policy¹².

Our culture starts with you.

We encourage each of you to set an example for those around you by acting in accordance with the principles stated in our Code of Business Conduct and Ethics, to be considerate of your peers and demonstrate behaviors that are critical for the success of our business.

It starts with you.





Most hyperlinks contained within this Code of Business Conduct and Ethics are intended solely for the use of employees. These links provide access to internal resources, policies, and guidelines that are essential for performing job-related duties.

Endnotes

- 1 See HF Sinclair's related [Conflict of Interest](#) information and its [Related Party Transaction Policy](#).
- 2 See HF Sinclair's [Global Anti-Corruption Policy](#).
- 3 See HF Sinclair's [Global Trade Compliance Policy](#).
- 4 See HF Sinclair's [Gifts, Meals and Entertainment Policy](#).
- 5 See HF Sinclair's [Third Party Due Diligence Policy](#).
- 6 See HF Sinclair's [Records Management Policy](#).
- 7 See HF Sinclair's [Antitrust and Competition Law Policy](#).
- 8 See HF Sinclair's [Global Privacy Policy](#).
- 9 See HF Sinclair's [External Communications Policy](#).
- 10 See HF Sinclair's [Technology, Digital Media and Social Media Policy](#).
- 11 See HF Sinclair's [Insider Trading Policy](#).
- 12 See HF Sinclair's [Human Rights and Modern Slavery Policy](#).
- 13 See HF Sinclair's [Discrimination, Harassment, Retaliation and Reporting Procedure](#).



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