



Preamble

HF Sinclair Corporation and all of its respective affiliates and subsidiaries (collectively “HF Sinclair, “we” or “our”) have developed this Human Rights and Modern Slavery Policy (this “Policy”), to set forth the principles we follow in promoting a responsible employment environment. This Policy supports compliance with the applicable laws related to terms of employment, worker conditions and human rights.

Policy Statements

Human Rights and Modern Slavery

“Modern slavery” is an umbrella term used to describe a range of exploitative labor practices, including forced labor, human trafficking, debt bondage and involuntary servitude. HF Sinclair does not knowingly conduct business with any individual or company that participates in modern slavery. HF Sinclair is committed to taking necessary steps so that such practices are not taking place in any part of HF Sinclair’s supply chain or business.

HF Sinclair is committed to respecting human rights in all aspects of its business. Our policies are aligned with the core principles of internationally recognized codes and conventions on human rights, including the United Nation’s Universal Declaration of Human Rights and the International Labour Organization’s core conventions. As such, HF Sinclair:

- Prohibits the use of compulsory labor;
- Prohibits the use of child labor;
- Prohibits the confiscation of workers’ original identification documents as a condition of employment;
- Supports the rights of all persons to a safe, secure workplace free from discrimination, harassment or retaliation;
- Promotes compliance with all laws related to wages, working hours and working conditions; and
- Prohibits payment of recruitment fees by workers to obtain work.

HF Sinclair’s Code of Business Conduct and Ethics (the “Code”) requires all directors, officers and employees to conduct business with unquestionable integrity and in compliance with all applicable laws, rules, and regulations. The Code specifically prohibits human trafficking, forced labor, child labor, and other exploitive labor practices. Any employee who is proven to have violated the Code is subject to disciplinary action, up to and including termination of employment.

HF Sinclair sets expectations with its suppliers through the HF Sinclair Supplier Code of Business Conduct and Ethics and its distributors through the HF Sinclair Distributor Code of Business Conduct and Ethics, which require our suppliers and distributors, respectively, to conduct their activities consistent with HF Sinclair’s policy on human rights. HF Sinclair suppliers are expected to contractually certify that materials incorporated into the products produced for HF Sinclair comply with all applicable laws and regulations, including those pertaining to human rights, anti-slavery and human trafficking. HF Sinclair reserves the right to terminate supplier and/or distributor contracts for violation of the respective Codes of Business Conduct and Ethics.

Anyone inside or outside HF Sinclair may report workplace concerns on HF Sinclair's ethics and compliance reporting line, Speak and Be Heard. Speak and Be Heard provides a direct, effective and risk-free way to report suspected violations of the Code, company policies, and applicable laws or regulations. Speak and Be Heard is available globally, with multilingual capacities, 24-hours a day, seven days a week. Reports made through Speak and Be Heard are promptly and thoroughly investigated.

Oversight and Governance

This Policy and any material changes shall be approved by the Executive Leadership Team. This Policy is owned by the Chief Compliance Officer who will review this Policy at least every two years and make updates as appropriate.

Related Documents

- Code of Business Conduct and Ethics
- Supplier Code of Business Conduct and Ethics
- Distributor Code of Business Conduct and Ethics
- Employee Handbook