



## **HollyFrontier Refining & Marketing LLC California Transparency in Supply Chains Act Disclosure**

Under the California Transparency in Supply Chains Act (the "Act"), HollyFrontier Refining & Marketing LLC ("we," "us" and "our") is required to disclose certain efforts that we take to eradicate slavery and human trafficking in our direct supply chain for the products that we sell. We are subject to the Act because we do business in California and meet certain revenue requirements specified in the Act. However, we believe that the nature of our business, products, and suppliers present minimal risk of slavery and human trafficking in our supply chain.

Our Code of Business Conduct and Ethics (the "Code") requires our employees and directors to conduct our business lawfully and with unquestionable integrity. The Standards of Conduct under the Code include equal employment opportunity, providing a safe and healthful work environment, equitable treatment of employees, fair dealing, and compliance with laws. Slavery and human trafficking are illegal and not permitted by our Code.

Our employees are required to certify as to their compliance with the Code. Our employees also undergo training to help ensure that they comply with applicable legal requirements and behave ethically. Employees are required to promptly report perceived violations of law or the Code.

Our contractors and suppliers also are expected to comply with all legal requirements and operate in a manner that is consistent with the Code. To further reinforce our compliance expectations, our contracts with our vendors require them to comply with the Code.

Any violation of the Code or concerns of possible ethics and compliance violations, including slavery and human trafficking in our supply chain, can be reported anonymously through our compliance hotline.

We will periodically reassess whether we need to conduct product supply chain verification or supplier compliance audits.