

## **Supplier Code of Conduct**

### **Purpose of the Supplier Code of Conduct**

Par Pacific Holdings, Inc. (“Par Pacific” or “we”) is committed to our values of integrity, creativity, hard work, and respect for others. It is essential that our suppliers remain fully aligned with those values to ensure the highest standards of operating excellence. The Par Pacific Code of Business Conduct and Ethics (“Code of Business Conduct and Ethics”) forms the foundation of our compliance and ethics program and provides concrete guidance for employees, suppliers and other stakeholders. We that suppliers be guided in their performance for Par Pacific by the principles and standards set forth in the Code of Business Conduct and Ethics and their own ethics and conduct policies.

This Supplier Code of Conduct (“Supplier Code of Conduct”) provides guidance and clarity to our suppliers regarding our expectations in this area. This Supplier Code of Conduct includes accepted standards of social and environmental responsibility, in addition to our high expectations for ethical business behavior.

Par Pacific expects Suppliers to act and conduct themselves in the highest ethical manner in all business dealings and interactions. Par Pacific expects all Suppliers to:

- Disclose to Par Pacific any potential conflicts of interest in relation to any bid or proposal;
- Ensure that all laws and regulations are fully complied with in relation to bribery, corruption and any other prohibited or improper business practices; and
- Immediately inform Par Pacific in writing of any actual or suspected breach of anything contained within this Supplier Code of Conduct.

### **Anti-Trust**

We expect our suppliers to respect anti-trust laws and refuse any agreement with a competitor concerning prices, costs, terms, customers, markets, production, business plans or any other matter that could affect competition. An unspoken agreement to fix prices or allocate markets is just as illegal as a spoken or written agreement.

Antitrust laws generally prohibit:

- Agreements, formal or informal, with competitors that harm competition or customers, including price fixing and allocations of customers, territories or contracts;
- Agreements, formal or informal, that establish or fix the price at which a customer may resell a product; and
- The acquisition or maintenance of a monopoly or attempted monopoly through anti-competitive conduct.

## **Bribery and Corruption**

We expect our suppliers to comply with the applicable laws in all countries to which they operate and do business, including laws prohibiting bribery, corruption or the conduct of business with specified individuals, companies or countries. We expect our suppliers to understand that offering, giving, receiving, or soliciting something of value in order to unfairly influence a business action or decision is considered a bribe by Par Pacific. Reference our Code of Business Conduct and Ethics for additional details.

## **Conflicts of Interest**

Suppliers will avoid taking part in or seeking to influence decisions on matters on which it has a conflict of interest. Supplier will not offer gifts or hospitality to Par Pacific employees or representatives that are not customary and acceptable in the industry, with the limited exception of promotional items of nominal value. No gifts, hospitalities, nor anything of value shall be offered or provided during or in connection with contract bidding, evaluation or award.

A conflict of interest arises when an entity's or an individual's interests interfere with the interests of Par Pacific. Par Pacific expects its suppliers to avoid transactions, commitments, and other activities that could create actual or apparent conflicts of interest in business decisions. For example, conflicts of interest may result from other employment or affiliation that put a supplier's interests at odds with those of Par Pacific. A conflict of interest exists when investments interfere with a supplier's ability to make impartial decisions with regard to its relationship with Par Pacific, or personal and family relationships that cause a supplier's interests to conflict with those of Par Pacific. Suppliers must also disclose to their Par Pacific employee contact any familial, business or other financial affiliations they have with Par Pacific or our employees. Reference our Code of Business Conduct and Ethics for additional details.

## **Environmental, Health & Safety**

Suppliers shall have a clear, publicly available health and safety policy statement in place. Suppliers shall be committed to developing and applying appropriate health and safety management systems as well as monitoring and reporting corrective actions related to such system. Suppliers will maintain a safe, healthy, clean, and well-lit work environment including appropriate and adequate facilities and protection from hazardous materials or conditions.

Par Pacific is deliberate in our commitment to using our resources responsibly to support the long-term sustainability. Par Pacific expects Suppliers to share this commitment to environmental sustainability and to comply with all laws and regulations in relation to the protection of the environment applicable to such Suppliers.

## **Ethics & Compliance**

Suppliers will comply with all applicable domestic and foreign laws and regulations applicable to the delivery of goods and services being provided. Suppliers will be committed to the highest standards of



ethical conduct when dealing with Par Pacific and its employees, as well as other Par Pacific suppliers and customers. Suppliers will not offer, permit or pay, directly or indirectly, any bribe, or otherwise tolerate or engage in any corrupt practice. Suppliers will not unlawfully restrict competition (i.e. agreements between competitors as to their pricing, bidding, production, supply and customer practices), or engage in forms of unfair conduct that may tend to create a monopoly. Suppliers will conduct all their activities professionally. Suppliers will act in good faith with respect to any recommendations that they give to Par Pacific, so that issues are not influenced by anything other than the best and proper interests of Par Pacific. Suppliers will not use suppliers or contractors who operate unethically, or who violate applicable laws. Suppliers will not engage with suppliers or contractors who compete unfairly or use unfair business practices.

## **Gifts & Entertainment**

Suppliers must not offer, give, request, or accept any extravagant or excessive gifts, entertainment, or travel on behalf of Par Pacific. Suppliers must also remember that strict rules apply when dealing with government officials and entities. Under some statutes, such as the U.S. Foreign Corrupt Practices Act (further described in Section 4 above), giving anything of value to a government official to obtain or retain business or favorable treatment is a criminal act subject to prosecution and conviction.

Business gifts and entertainment are meant to create goodwill and sound working relationships and not to gain improper advantage. The exchange, as a normal business courtesy, of meals or entertainment (such as tickets to a game or the theatre or a round of golf) is a common and acceptable practice as long as it is not extravagant. Unless express permission is received from a supervisor, a Compliance Officer or the Audit Committee, gifts and entertainment cannot be offered, provided or accepted by any employee of Par Pacific unless consistent with customary business practices and not excessive in value. This principle applies to Par Pacific's transactions everywhere in the world, even where the practice is widely considered "a way of doing business." Suppliers should know that Par Pacific's employees' judgment is not for sale.

## **Human Rights**

Par Pacific expects all Suppliers to respect human rights and to conduct operations accordingly. This includes but is not limited to prohibiting slavery, forced labor, human trafficking, and child labor. Par Pacific also expects that its Suppliers respect their employees' rights to join, or not to join, a labor union, and for Suppliers to commit to bargain in good faith with all legally recognized labor unions.

Par Pacific expects Suppliers to be committed to providing a safe and secure workplace for their employees that fully complies with all health and safety laws, regulations and practices. In addition, Suppliers shall ensure that all employees are provided with appropriate health & safety training, such as safe work practices and emergency preparedness. Suppliers shall fully comply with all applicable laws and regulations with their employees when setting conditions on working hours, benefits and wages (such as minimum legal wages).

## Information Security & Intellectual Property

Suppliers must respect the copyrights, trademarks, patents and intellectual property rights of Par Pacific and other parties with whom it interacts on Par Pacific's behalf. Par Pacific's trade secrets, contracts, manufacturing, customer, employee and pricing data are also considered proprietary and confidential information and must not be shared except as instructed by Par Pacific. Suppliers must have an established and maintained data privacy and information security program, in accordance with industry standards, to safeguard Par Pacific's sensitive and proprietary information, maintain confidentiality of proprietary information and prevent the accidental destruction, alteration, modification, loss, distribution, dissemination, misuse, or unlawful use of Par Pacific's intangible assets.

## Responsible Sourcing

Suppliers are expected to demonstrate environmental responsibility by minimizing any adverse effects from their operations on the community, environment, and natural resources. All required permits, registrations and reporting are to be obtained, maintained, and kept current.

## Responsibilities of Suppliers

All Suppliers must:

- 1** **Read**, comply with, and understand how these Conduct Guidelines apply to your role as a Par Pacific Supplier

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- 2** **Contact** [Procurement@Parpacific.com](mailto:Procurement@Parpacific.com) if you have any questions or concerns regarding these Conduct Guidelines

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- 3** **Provide documentation** of all required training and certifications, as may be required by contract or policy

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- 4** **Report** any suspected or known violations of these Conduct Guidelines to [Procurement@Parpacific.com](mailto:Procurement@Parpacific.com)