

HollyFrontier Corporation
Holly Logistic Services, L.L.C.
Holly Energy Partners, L.P.

Modern Slavery Policy

Introduction

HollyFrontier Corporation, Holly Logistic Services, L.L.C., the ultimate general partner of Holly Energy Partners, L.P. and their affiliates and subsidiaries (“HollyFrontier”, “we” or “our”) are committed to conducting their business operations in a manner that complies with applicable laws and regulations and achieves the highest standards of business ethics and integrity. “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. HollyFrontier does not knowingly conduct business with any individual or company that participates in modern slavery and HollyFrontier is committed to taking necessary steps so that such practices are not taking place in any part of HollyFrontier’s supply chain or business.

The Company’s Business and Supply Chains

HollyFrontier operates three segments – refining, lubricants and specialties and midstream – principally in the United States, Canada and the Netherlands and has sales offices in other countries, including the United Kingdom. Our business operating model relies upon the activities of third parties including logistics and fleet providers, distributors, subcontractors and suppliers.

We source goods and services to support our operations globally. Our global procurement organization manages the majority of our global supply chain, which includes the following categories of spend:

- Raw materials, transportation and utilities. This category includes fuel and feedstocks, chemical lubricants and fuels, freight and logistics and fleet and vehicle services.
- Direct material (additives and packaging) which includes lubricant packaging and third party lubricant manufacturing. These materials are predominantly sourced from North American manufacturers.
- Indirect materials, which includes materials we buy to operate our production facilities and offices, such as refinery fixed, rotating and electrical equipment, mechanical repair materials and supplies and IT supplies and software.
- Indirect labor, which largely consists of US-based consulting, engineering and technical services supporting our facilities.

The Company’s Policy Statement on Human Rights

HollyFrontier 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, HollyFrontier:

- Prohibits the use of compulsory labor;
- Prohibits the use of child labor;
- Supports the rights of workers to associate freely and bargain collectively;
- 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.

HollyFrontier’s Code of Business Conduct and Ethics (the “Code”) requires all directors, officers, employees, and any third party conducting business on behalf of or for purposes of HollyFrontier to comply with the laws and regulations of all countries in which we operate. The Code specifically prohibits child labor, forced labor, human trafficking and human rights abuses of any kind. Any employee who is proven to have violated the Code is subject to disciplinary action, up to and including termination of employment.

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

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

Management of Our Supply Chain

HollyFrontier strives to conduct business only with ethical and trustworthy business partners. To that end, HollyFrontier 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, HollyFrontier 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

Suppliers who present a higher risk of modern slavery risk are required to undergo a detailed assessment. This includes completing an annual questionnaire and certification regarding their practices with respecting to mitigating modern slavery risk. HollyFrontier reviews these certifications and questionnaires with and addresses any gaps in compliance directly with the supplier.

Training

All HollyFrontier employees are required to take annual training on the Code and to certify compliance with the Code. Participation in the Code training is mandatory and documented in HollyFrontier's learning management system.

During the financial years of 2019 and 2020, there were no reports or findings of the presence of modern slavery in HollyFrontier's business or supply chain. HollyFrontier will continue to benchmark its standards and audit its approach against regulatory requirements and available guidance.