

HOLLYFRONTIER'S HUMAN RIGHTS POLICY

THIS STATEMENT IS PUBLISHED ON BEHALF OF HOLLYFRONTIER CORPORATION AND ITS SEGMENTS, DIVISIONS, SUBSIDIARIES, AND AFFILIATES WORLDWIDE (“HOLLYFRONTIER”).

HollyFrontier's Commitment

HollyFrontier is committed to conducting its business operations in a manner that complies with applicable laws and regulations and according to the highest standards of business ethics and integrity. HollyFrontier prohibits forced labor and human trafficking and is committed to taking steps to ensure that forced labor or human trafficking are not taking place in any part of our supply chain or business.

HollyFrontier Policies

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. Further, HollyFrontier requires compensation practices to comply with applicable wage laws, including minimum wage requirements, overtime compensation, and legally mandated benefits. HollyFrontier also respects the rights of workers to associate freely and seek representation in accordance with local law. 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. Similarly, any employee who is proven to have violated the Code is subject to disciplinary action, up to and including termination of employment.

Directors, officers, employees, suppliers, distributors, contractors and external stakeholders may report workplace concerns on HollyFrontier's ethics and compliance hotline. HollyFrontier's ethics and compliance hotline 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 hotline is available globally, with multilingual capacities, 24-hours a day, seven days a week. Reports made through the hotline are promptly and thoroughly investigated.

Due Diligence

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.

Training

HollyFrontier reinforces its ethics and compliance requirements through annual training for all directors, officers, employees, including those with direct responsibility for supply chain management, and business partners. HollyFrontier has mandatory training that details its commitment to treating all employees equally and fairly, respecting human rights, promoting a healthy and safe workplace, and treating employees with dignity and respect. Additionally, HollyFrontier conducts training on human trafficking laws, which includes communication with the executive leadership of its business partners, to reiterate the importance of respecting human rights.

FOR PURPOSES OF THE UNITED KINGDOM MODERN SLAVERY ACT OF 2015:

FOR PURPOSES OF THIS STATEMENT, SEGMENTS, DIVISIONS, SUBSIDIARIES AND AFFILIATES WORLDWIDE OF HOLLYFRONTIER CORPORATION SPECIFICALLY INCLUDES BUT IS NOT LIMITED TO PETRO-CANADA EUROPE LUBRICANTS LIMITED.

During the financial year of 2017 and 2018, there were no reports or findings of the presence of modern slavery or human trafficking in HollyFrontier's business or supply chain. HollyFrontier will continue to benchmark its standards and audit its approach against regulatory requirements and available guidance.

FOR PURPOSES OF THE CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT DISCLOSURE (SB657):

HollyFrontier verifies its procurement supply chains through periodic validations by onsite inspections. In limited circumstances, third-party auditors may be contracted by HollyFrontier to conduct on-site activities; however, a select number of assessments are performed by HollyFrontier personnel. HollyFrontier personnel performing these activities are trained to recognize and are obligated to report noncompliance.

Vaishali S. Bhatia,
Chief Compliance Officer