



**AMERICAN REFINING GROUP, INC.
SUPPLIER CODE OF CONDUCT AND
ETHICS**



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1. INTRODUCTION

American Refining Group, Inc. (ARG) operates in an honest and ethical manner, complying with applicable laws and regulations, and guided by shared values. We expect our suppliers to uphold the same standards of conduct and behavior while on our premises or when conducting business on our behalf. The Supplier Code of Conduct and Ethics policy outlines ARG's expectations regarding business management, environmental protection, health and safety, labor practices, and human rights. This policy reflects the company's commitment to conducting business with indisputable integrity, adhering to all applicable laws, rules, and regulations, and partnering with organizations that share our commitment and vision. It applies to all suppliers, vendors, contractors, and agents (Suppliers) providing products and/or services to ARG and represents our minimum expectations. Any violations of this code, whether direct or indirect, will result in the termination of any partnership or business relationship with ARG.

2. BUSINESS MANAGEMENT

2.1 COMPLIANCE AND TRANSPARENCY

Suppliers must operate in full compliance with international, national, state, and local laws and ordinances. ARG expects lawful orders, codes, and treaties to be adhered to concerning the import, export, and transportation of goods and materials. Transparency in all business activities is essential.

2.2 ANTI-CORRUPTION AND ANTI-BRIBERY

Suppliers should have robust anti-corruption and anti-bribery measures in place. Any form of offering or receiving anything of value in exchange for preferential treatment is strictly prohibited.

3. FAIR COMPETITION

3.1 COMPETITION AND FAIR PRACTICES

ARG is committed to free and open competition and complies with antitrust and competition laws. Suppliers must refrain from misrepresenting their products or services, acting dishonestly, or engaging in any unfair or anticompetitive practices.

3.2 BIDDING AND AGREEMENTS

Suppliers are required to bid independently from competitors and must not engage in discussions with competitors concerning bidding practices. Any agreements, coordinated practices, or understandings that restrict competition are strictly prohibited.

3.3 INFORMATION SHARING

Suppliers must not gather information about competitors using unethical or illegal means and should refrain from exchanging sensitive information with competitors, including pricing, costs, and market data.

4. FRAUD PREVENTION

4.1 ASSET PROTECTION

ARG has a zero-tolerance policy for acts involving theft, fraud, embezzlement, or falsification of any ARG or customer assets. Suppliers are expected to maintain the highest standards of honesty and ethics in their dealings with ARG.

4.2 REPORTING MISCONDUCT

Suppliers are encouraged to report any suspicious activity or misconduct related to fraud or unethical behavior.

4.3 WHISTLE BLOWER POLICY

Suppliers should maintain whistleblower protections to ensure the confidentiality of those reporting incidents or unlawful or unethical behavior, safety concerns, employment violations or other misconduct. This policy should include a grievance mechanism, tracking and monitoring of reports made.

5. DATA PRIVACY AND INTELLECTUAL PROPERTY

5.1 DATA PROTECTION

Suppliers must maintain strict confidentiality of ARG customers' and employees' personal information. Compliance with all applicable laws and regulations governing the collection, transfer, processing, and retention of personal information is mandatory.

5.2 INTELLECTUAL PROPERTY

Suppliers must respect ARG's intellectual property and proprietary information. The same level of care and confidentiality should be afforded to ARG's proprietary data as is given to the supplier's own confidential information.

6. HEALTH AND SAFETY

6.1 WORKPLACE SAFETY

Suppliers are expected to provide a safe and healthy working environment for their employees, adhering to relevant laws, codes, and regulations. This includes appropriate controls, safety procedures, preventative maintenance, and personal protective equipment (PPE).

6.2 ENVIRONMENTAL RESPONSIBILITY

ARG encourages suppliers to seek ways to reduce waste, emissions, and discharge in their operations, products, and services. An effective management system should be in place to encourage continuous improvement in environmental, health, and safety performance.

Suppliers are expected to adhere to applicable environmental regulations and to obtain and maintain compliance with required permits.

Suppliers should consider environmental impacts and protections when selecting materials and transport methods for the products and services they supply to ARG.

6.3 TRAINING AND EMERGENCY RESPONSE

ARG is committed to training and provides its Suppliers with access to the company's Supplier Code of Conduct and Ethics policy when a contract is established. Suppliers that work with ARG must ensure that their employees are adequately trained, qualified, and equipped to perform their duties safely. Personal protective equipment (PPE) should be provided, along with adequate instructions for its use. In addition, an effective emergency response plan must be established where Suppliers have and procedures in place for all operations conducted on ARG's behalf. This includes incident reporting, continuous improvement initiatives, collaboration and drills, and regulatory compliance related to emergency response in the regions where they operate. Failure to comply with our training and emergency response requirements may result in sanctions, including contract termination or disqualification as a supplier.

7. ENVIRONMENTAL PROTECTION

7.1 SUSTAINABLE PRACTICES

Suppliers should develop and administer environmentally responsible business practices, including the conservation of natural resources and energy, reduction of waste, reduction of hazardous substance usage, and the minimization of events causing adverse environmental impact.

7.2 REGULATORY COMPLIANCE

Suppliers must comply with all applicable environmental laws and regulations and obtain and maintain all required permits.

7.3 POLLUTION CONTROL

Suppliers must responsibly dispose of hazardous materials or recycle them whenever possible. Effective control of air emissions, including volatile chemicals, corrosives, particulates, combustion byproducts, and ozone-depleting chemicals, is essential. Efforts should be made to prevent contamination from stormwater runoff and to limit noise generation.

8. SUSTAINABILITY INITIATIVES

8.1 SUSTAINABLE PRACTICES

Suppliers should implement and maintain policies and practices to promote the conservation of natural resources, animal welfare, protection of local communities and ecosystems and the well being of employees and stakeholders. Suppliers should implement reuse and recycling programs where possible and collaborate with their subcontractors to evaluate and address environmental and sustainability issues within their supply chain.

9. LABOR AND HUMAN RIGHTS

9.1 ETHICAL LABOR PRACTICES AND FAIR EMPLOYMENT

Suppliers should maintain a work and business environment free from human trafficking, unlawful child labor, or any violations of human rights. They must employ workers who meet the applicable minimum legal age requirement.

Suppliers should provide wages equal to or greater than the applicable legal minimum wage and any statutory benefits. If no legal minimum wage exists, wages should be comparable to prevailing industry standards. Working hours should align with applicable legal norms, and overtime hours should be compensated for at the legally mandated rate. Employment decisions should be based on skill, ability, and performance, and discrimination based on various factors is strictly prohibited.

9.2 HUMAN RIGHTS COMPLIANCE

Suppliers should not utilize or benefit in any way from forced labor or utilize vendors or subcontractors that employ unpaid labor. Suppliers must support and respect internationally proclaimed human rights and refrain from knowingly assisting in any violation of human rights.

9.3 ANTI-HARASSMENT

Suppliers should create a workplace free from harassment and abuse, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, or verbal abuse. Any forms of harassment are not permitted.

9.4 COMPLIANCE WITH SLAVERY AND HUMAN TRAFFICKING LAWS

ARG is committed to the highest standards of integrity and ethical conduct. We have a zero-tolerance policy for slavery and human trafficking within our organization and supply chain. We are dedicated to complying with all applicable laws and regulations regarding this issue. Suppliers are expected to fully comply with all laws, rules, and regulations concerning slavery and human trafficking.

10. CONFLICTS OF INTEREST AND ETHICS

10.1 OBJECTIVE DECISION-MAKING

Suppliers should make business decisions in the best interests of ARG, free from personal interests. Any actual or apparent conflicts of interest should be avoided, and any potential conflicts should be disclosed and addressed.

11. COMPLIANCE REVIEW AND VERIFICATION

ARG conducts regular reviews to ensure supplier compliance. These reviews may involve requests for documentation, on-site visits, and other verification methods. Acceptable forms of documentation or verification to substantiate compliance include certificates, reports, audits, and self-assessments that align with industry standards. Compliance with the ARG Supplier Code of Conduct and Ethics policy is subject to annual or semi-annual reviews, as determined by ARG. Suppliers implicitly agree to comply with all the requirements of this policy by accepting any purchase order from ARG or entering a contract with ARG. Non-conformance with the outlined principles in this policy may result in corrective actions, which can include the discontinuation of the supplier relationship. This policy serves as a supplement and does not override any rights retained by ARG under any contract with the Supplier. If you have any questions about this policy, please reach out to the ARG Purchasing Department.

12. CONTINUOUS IMPROVEMENT

ARG is firmly committed to continuous improvement and cultivating partnerships with Suppliers who embrace our values of ethical conduct, sustainability, and responsibility. To uphold these principles, ARG's Purchasing Department will perform an annual review and revision of ARG's Supplier Code of Conduct and Ethics policy. These regular assessments will incorporate the latest best practices and industry standards in the oil and gas sector, ensuring alignment with the most current guidelines. Furthermore, we encourage Suppliers to actively seek opportunities for ongoing enhancements in their operations, focusing on sustainable and ethical business practices. Collaborative efforts and strategic partnerships with ARG are vital for achieving these objectives while adhering to industry best practices in the oil and gas sector.

Table 12-1			
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V2			
V3			
V4			

Furthermore, we encourage Suppliers to actively seek opportunities for ongoing enhancements and continuous improvement in their operations, focusing on sustainable and ethical business practices. Collaborative efforts and strategic partnerships with ARG are vital for achieving these objectives while adhering to industry best practices in the oil and gas sector.