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MOTIVA

CODE of CONDUCT

WE DO THE RIGHT THING

capabilities courage untable
enthusiasm ONE leadership
safely values EXCELLENCE
fun dedication
sustainability
challenge learn
responsibility
clarity
diver

This Policy, fit for purpose for Motiva's workforce and commercial interests, fully conforms with the Saudi Aramco Global Code of Business Conduct — CP-1 (GB).





Dear Colleagues,

At Motiva, we are committed to upholding the highest standards of business conduct. Doing things the right way, ethically, with integrity, and in full compliance with the law, is not only policy at Motiva. It's ingrained in our culture.

We **DO THE RIGHT THING**, the right way, every day. Together, we share responsibility for living our core values and implementing our standards of business conduct, which are set forth in this Code of Conduct.

Integrity matters, and it is not optional at Motiva. Every Motiva employee, director, and officer, regardless of location or position in our company, has an obligation to read this Code, understand it, and follow it every day without exception. Everyone

who works at or with Motiva should feel confident about our high ethical standards, our honesty and our integrity. That starts and ends with each of us.

The Code guides us in maintaining a respectful and ethical workplace. You have my personal commitment that we will empower our team members to exchange ideas vigorously and to provide constructive feedback and challenges, but also to create a workplace free of any kind of intimidation or harassment.

If you believe intimidation or harassment is taking place, or that our Code has been violated in any way, you have a responsibility to report it. As shared in the Code, there are anonymous reporting options available to you. Retaliation against anyone who speaks up in good faith or cooperates in an investigation will not be tolerated.

As you review the Code, I encourage you to think about your daily work activities and scenarios. If faced with an ethical concern, how will you respond to ensure you are acting in accordance with the Code? If you have questions, I encourage you to reach out to the contacts listed in the Code.

As we live our values of doing the right thing, acting as One Motiva, empowering each other, and delivering excellence, we are following through on the commitments we have made to ourselves, each other, and our communities. How we work together as a company, as a partner with our customers and suppliers and as a member of the community is just as important as the products we make, and I am proud to be part of a company that is a force for good in all these areas.

Sincerely,

JEFF RINKER

President and CEO

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Motiva's Business Framework

- Our Values
- Our Purpose
- Our Objectives
- Our Capabilities

OUR VALUES

Our Code of Conduct establishes clear boundaries that guide our pursuit of this aspiration and begins with our values:

We do the RIGHT THING

We don't compromise on our values

We conduct our business **safely** and **sustainably** with **honesty, integrity, and respect**. We value our people and the communities where we operate. Our daily actions and **authenticity** demonstrate our commitment to responsible business operations.

We are ONE MOTIVA

We work together to achieve a common goal

We lead with **humility** and **trust each other's intent and capabilities**. We **build** relationships and **encourage and challenge** one another to achieve the best outcome. We value **diversity** and are **inclusive** of people and ideas.

We are EMPOWERED

We are decisive and willing to challenge the status quo

We are empowered to make difficult and timely decisions. We seek **clarity** and encourage **candor**. We **learn** from our successes and our failures. Our **resilience** enables us to **overcome adversity** and find creative fit-for-purpose solutions to difficult challenges.

We deliver EXCELLENCE

We have a passion for results

We are **accountable** to deliver on our commitments – with **passion, purpose, and dedication**. We tackle new opportunities with **optimism, enthusiasm, and a sense of urgency**. And we have **fun making a difference**.



OUR PURPOSE

Be the safest and most profitable Americas downstream business of Aramco

OUR OBJECTIVES

- Achieve incident-free workplace
- Deliver sustained cash growth to achieve \$5 billion annually
- Grow refining, trading and commercial business
- Build chemicals business
- Transform systems for competitive advantage
- Have fun making a difference



OUR CAPABILITIES

Our eight capabilities are paramount to achieving our purpose to be the safest and most profitable Americas downstream business of Aramco. Everything we do moves us toward this goal everyday.

OPERATIONAL EXCELLENCE: We consistently achieve results, even under tough circumstances.

COMMERCIAL MINDSET: We apply knowledge of business and the marketplace to advance the organization's goals.

FINANCIAL STEWARDSHIP: We interpret and apply understanding of key financial indicators to make better business decisions.

AGILITY: We maneuver comfortably through complex policy, process, and people-related organizational dynamics.

TEAMWORK: We build partnerships and work collaboratively to meet shared objectives.

LEADERSHIP: We build strong teams that apply their diverse skills and perspectives to achieve common goals.

CUSTOMER FOCUS: We build strong customer relationships and deliver customer-centric solutions.

TALENT MANAGEMENT: We attract and select the best talent and develop people to meet their career goals and the future needs of the company.



Doing the Right Thing

- What is the Code of Conduct?
- Who Must Follow the Code?
- What are the Additional Expectations for Management?

WHAT IS THE CODE OF CONDUCT?

The Code of Conduct (Code) is the foundation of our ethics and compliance program. By outlining the various risk areas related to our business, it helps us maintain integrity, professionalism, and profitability as a leader in our industry.

Our Code serves multiple purposes; however, it does not provide exhaustive information about every single Motiva standard or policy. Our Code provides behavioral expectations and guidelines on how to conduct business and serves as a common reference point to clarify what is expected in specific situations. It also covers the laws, regulations, internal policies, and behaviors necessary to achieve our objectives and maintain our Company's high standards.



WHO MUST FOLLOW THE CODE?

We are all expected to abide by both the letter and spirit of the Code. This means that every Motiva employee and officer must follow our Code. Contractors and consultants acting as our agents, working on our behalf, or operating in our name are required to act consistently with the Code. Violations of our Code, policies, or the law may carry serious consequences for the individuals involved and our Company.



WHAT ARE THE ADDITIONAL EXPECTATIONS FOR MANAGEMENT?

Holding a management position at Motiva means accepting an additional set of responsibilities. Management is to lead by example in order to ensure that all staff are aware of and abide by this Code and other Company policies and procedures, applicable laws and regulations.

- Ensure that all of your direct reports understand their responsibilities.
- Create an “open-door” environment where your direct reports and other Motiva personnel feel comfortable asking questions or making reports.
- Consider integrity and accountability to be an integral part of the performance evaluations and reward incentives of direct reports.
- Ensure that Motiva personnel, who voice their opinion or make reports, are informed of Motiva’s non-retaliation policy.



Our Commitment to Integrity

- When the Right Action is Not Clear
- Zero Tolerance for Retaliation



WHEN THE RIGHT ACTION IS NOT CLEAR

While working at Motiva, you may confront uncomfortable situations. Often, your common sense and good judgment will be sufficient to help you prevent or resolve violations. More complex situations may require extra guidance, which should be sought through proper channels within Motiva.

You can ask questions or raise concerns in several ways:

- Your supervisor or manager
- Your Human Resources Business Partner
- The Subject Matter Expert on the subject or Motiva Legal
- The Corporate Compliance Office, available through MyMotiva
- The Helpline (a confidential service open 24 hours a day, seven days a week) at 844-678-0452 or online at: motiva.ethicspoint.com

You can also access EthicsPoint with this QR code.



Is it legal?

Is it ethical
and aligned
with the Code
and supporting
policies?

Does it
promote our
core values?

Would I feel
comfortable if
my actions
were made
public?



ZERO TOLERANCE FOR RETALIATION

Motiva strictly prohibits acts of retaliation against any person for providing information in good faith or assisting in a company-led investigation.

An individual who makes a report in bad faith, or who retaliates against a person for making a report or participating in an investigation in good faith, may be subject to disciplinary action, up to and including termination.

Learn More



[Reporting and Anti-Retaliation Policy](#)



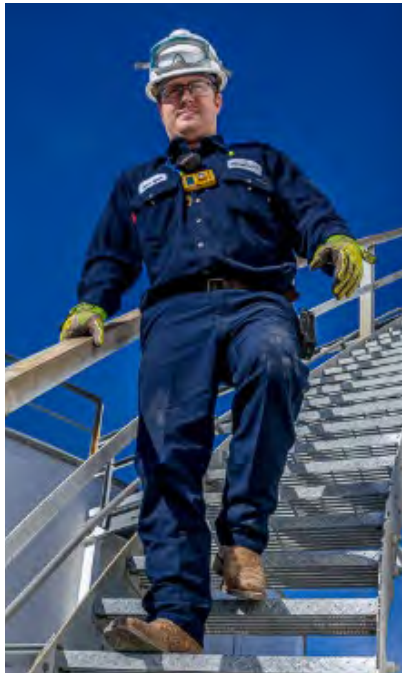
Our Commitment to Health, Safety, and the Environment

- Health and Safety
- Environment

HEALTH AND SAFETY

The safety of our people, communities, and the environment is an unchangeable core value of the company. For this reason, we are committed to pursuing the highest health, safety, and environmental standards in all of our locations. We must comply with all applicable health and safety rules and regulations, as well as all posted safety procedures within our areas of operation.

We will not engage in or tolerate any form of violence. "Violence" includes threats or acts of violence, bullying, intimidation of others or attempts to instill fear in others. Weapons are not allowed in the workplace, consistent with local law. If you know of or suspect incidents or threats of workplace violence, you must immediately report your concerns.



ENVIRONMENT

Motiva is committed to protecting the environment and pursuing environmentally sound business practices. Our Company understands that a healthy environment benefits our stakeholders and sustains our ability to conduct our business. To that end, we make every effort to be environmentally responsible at every stage of manufacturing and distributing our products.

Learn More



[Life Saving Rules](#)



[Health, Safety and Environmental \(HSE\) Policy](#)



Our Commitment to One Another

- Respect
- Privacy and Others' Confidential Information



RESPECT

Motiva respects and values the diversity reflected in our various backgrounds, experiences, and ideas. Our inclusive work environment fosters respect for all of our stakeholders and reflects the diversity of our various communities. Motiva also provides equal opportunity to all job applicants and employees. For this reason, we do not make employment-related decisions or discriminate against anyone on the basis of a protected status under the applicable laws.

At Motiva, we remain strongly committed to respecting and protecting basic human rights wherever we operate. As part of this commitment, our Company follows all applicable wage and hour laws, including minimum wage, overtime, and maximum hour rules. Motiva pays competitive wages and provides employees the opportunity to develop their skills and capabilities to enhance their ability to succeed in their career, consistent with the needs of the business.

Our Company prohibits all forms of unlawful harassment, whether physical, sexual, verbal or other. Generally, "harassment" is any form of unwelcome behavior toward another person that is motivated by a characteristic protected by applicable law and has the purpose or effect of creating an intimidating, hostile, or offensive work environment.

Learn More



[Human Resources Policy Manual](#)



[Anti-Harassment Policy](#)



PRIVACY AND OTHERS' CONFIDENTIAL INFORMATION

During the course of our employment, we each provide sensitive personal, medical, and financial information to the Company. Motiva is committed to protecting this information.

When any personal or confidential data needs to be sent to an outside source, you should use all reasonable safeguards against any loss, destruction, or inadvertent disclosure.

We are also responsible for protecting any confidential and proprietary information that our suppliers, customers, and other business partners entrust to us. Take care that this information is not disclosed to anyone who isn't authorized to have it.

Learn More



[Data Classification and Handling Policy](#)

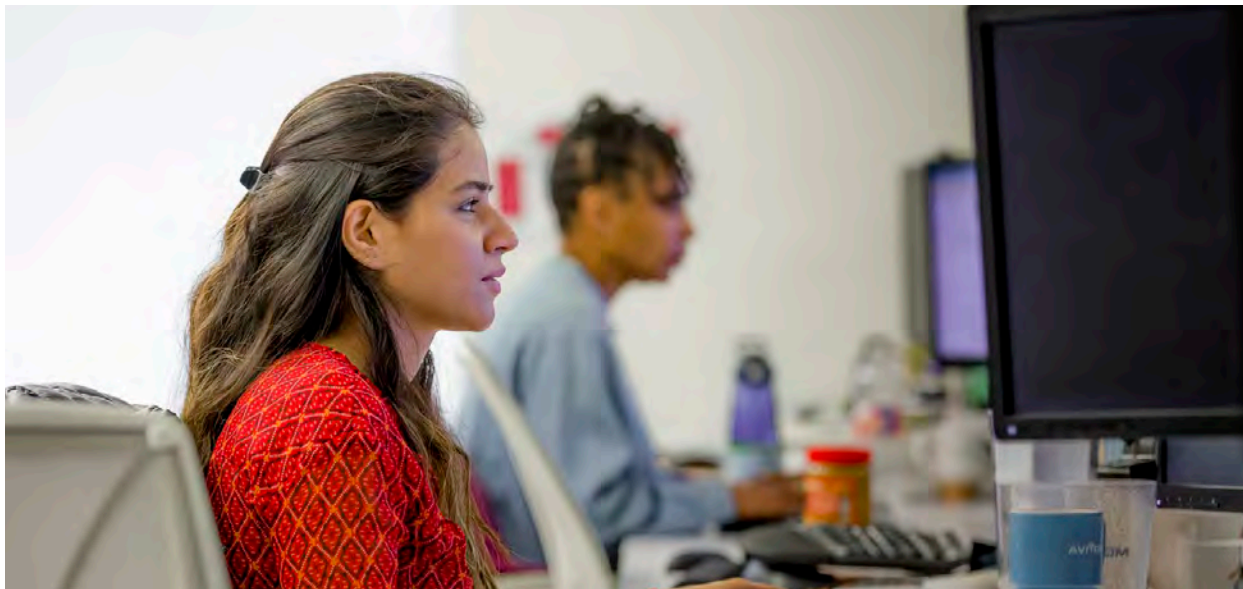


[Privacy and Data Protection Policy](#)



Our Commitment to the Company

- Records
- External Communications
- Confidential Information
- Use of Assets
- Conflicts of Interest
- Gifts, Meals, and Entertainment



RECORDS

Because our owner and business partners rely on the detailed information contained in our company records, it is our responsibility to ensure that the information we provide is accurate, timely, complete, fair, and understandable. This applies to all company records we prepare, including expense reports, contract documentation, and time records.

All Motiva employees are expected to ensure that company records are properly managed throughout the information lifecycle and in accordance with the record retention schedule. Individuals who are responsible for accounting or financial reporting must ensure that our financial statements, regulatory reports, and other publicly filed documents comply with all applicable and accepted accounting principles, statutory reporting, and tax requirements.

Our ability to retrieve company records quickly and reliably is equally important. Company records must be maintained and destroyed in compliance with the records retention schedule, legal holds, and all other associated business requirements.

Learn More



[Records Management Policy](#)



EXTERNAL COMMUNICATIONS

Because the preservation of our reputation is everyone's responsibility, we need to ensure that public communications consistently, accurately, and honestly depict our business activities. If you receive an information request from an investor, security analyst, press, or other key public contact (even informally) please indicate that you are not the appropriate person to address their inquiry and refer the requestor to Motiva's Media Desk.

We recognize that new and evolving ways of engaging with our stakeholders and promoting our brand are fundamentally changing the way we work and communicate. While traditional media is still a significant source of information, social media is increasingly used to share information. Some examples include blogs, social networking sites such as Facebook®, Twitter® and LinkedIn®, wikis, photo/video sharing sites such as Instagram®, and chat rooms.

Because there are many laws around the world that regulate what Motiva can and cannot say about itself we have established rules for us to follow when using social media as part of our daily work and in our personal use.

As a general rule, when using social media, you should:

- Seek authorization from the Motiva Communications Manager before posting official information about our Company.
- Protect Company assets and confidential information, always remembering that the Internet is a public place.

Learn More



[Communications Policy](#)



CONFIDENTIAL INFORMATION

Just as we must protect Motiva funds or equipment, we must also safeguard our Company's intellectual property (IP). Motiva's information is a valuable asset and should be guarded closely and used wisely. We must also protect Motiva's confidential and proprietary information, which generally includes any information not available to the public. Motiva both discloses confidential information to, and receives confidential information from, third parties. We may share confidential information only with people who are authorized to have it for legitimate business purposes.

Learn More

- ➔ [Privacy and Data Protection Policy](#)
- ➔ [Data Classification and Handling Policy](#)

USE OF ASSETS

Our Company's physical assets have been acquired through the hard work of everyone at Motiva. These assets include facilities, equipment, materials, and property. We must take great care to protect them from damage, theft, or waste.

We also have a shared responsibility to safeguard Company property. Each Motiva facility has specific rules pertaining to internal security, and we should all know and follow these rules. We each have an obligation to report the loss or misuse of any Company property to our supervisor or security personnel.



CONFLICTS OF INTEREST

We are responsible for acting only in the best interests of the Company. In order to uphold its reputation, we must be alert to any situations that may create a conflict of interest. All Motiva employees, contract personnel, and officers are required to avoid situations in which their personal interests conflict or might conflict with the interests of Motiva. A “conflict of interest” (COI) arises when you have an interest (financial or otherwise) or a personal relationship that could interfere with your duty to act solely in the best interests of Motiva.

While it is not possible to describe every situation that could give rise to a conflict of interest, some of the more common conflict of interest situations are outlined below:

- A situation where you could become competitive with our Company.
- Accepting outside employment may also create a conflict of interest.
- You, your family member, or close personal friend have a personal stake in a company that is a supplier, reseller, customer, potential supplier, or competitor of Motiva.

Learn More



[Conflict of Interest Policy](#)

GIFTS, MEALS, AND ENTERTAINMENT

As a general principle, we discourage employees from accepting gifts, meals, or entertainment from third parties. Gifts of cash or cash equivalents (such as loans, discounts, gift cards, or gift certificates) are strictly prohibited.

However, Motiva recognizes that the occasional acceptance or offer of modest gifts, meals, or entertainment may be a legitimate contribution to good business relationships. It is important that gifts, meals, or entertainment are not perceived as lavish or outside the normal course of business for the type of relationship and the parties involved. The acceptance of gifts, meals, or entertainment should not cause others to perceive an unfair or artificial influence.



[Learn More](#)



[Gifts, Meals, & Entertainment Standard](#)



Our Commitment as a Responsible Corporate Citizen

- Ethical Sales and Marketing
- International Trade Compliance
- Anti-Money Laundering
- Competition and Anti-Trust
- Insider Dealer/Trading
- Facilitating Payments
- Anti-Corruption and Bribery



ETHICAL SALES AND MARKETING

We are expected to compete vigorously, but never unlawfully. Those of us involved in selling, advertising, promoting, and marketing our products and services must ensure that our business conduct is guided by honesty and integrity. This means we are accurate and truthful when representing the quality, features, or availability of our products and services.

INTERNATIONAL TRADE COMPLIANCE

At Motiva, our work involves the transit of goods across national borders. It is therefore critical for those of us whose work involves the sale, shipment, electronic transfer, or disclosure of technical information, software, goods, or services to be knowledgeable and up to date with applicable rules and regulations. We must understand and follow the laws relating to exports, re-exports, or imports from the U.S. and, in certain circumstances, overseas.

Regardless of where we are doing business, we must follow U.S. laws that prohibit participating in or cooperating with any international boycott not approved by the U.S. government.

Learn More



[U.S. Import Trade Compliance Manual](#)



As a responsible corporate citizen, Motiva expects all its employees, contractors and business partners to practice ethical business practices at all times. The following activities must be avoided. Contact [Motiva Legal](#) with any questions, concerns or for additional guidance.

ANTI-MONEY LAUNDERING

Money laundering is the process by which individuals or entities try to conceal illicit funds or otherwise enter into transactions to make these funds appear legitimate. Motiva does not condone, facilitate, or support money laundering.

COMPETITION AND ANTI-TRUST

Competition laws prohibit entering into formal or informal agreements with suppliers, distributors, or customers that may restrict competition. Such agreements include tying products, fixing resale prices, or refusing to sell to particular customers or buy from particular suppliers.

Agreements among competitors often raise suspicions of anti-trust violations. While competition laws are complex, they generally forbid discussing any topics with competitors that may restrain trade, such as price fixing, bid rigging, or dividing or allocating markets, territories, or customers.

INSIDER DEALING/TRADING

While working on behalf of Motiva, we may become aware of material, non-public information about our Company, our owners, our customers or other companies. Material, non-public information (also known as "inside information") is information about a company that is not known to the general public and that could influence a typical investor's decision to buy, sell, or hold that company's securities.

It is also illegal to be involved in "market abuse." Market abuse involves spreading false information or engaging in activities designed to manipulate the price of publicly listed securities.

[Learn More](#)



[Insider Trading Policy](#)

FACILITATING PAYMENTS

When working with government officials, we will not agree to pay facilitating payments, even if we are working in locations where they may be legal or a common practice. A “facilitating payment” (or “grease payment”) is usually small and made in cash in order to expedite standard government services such as processing permits, providing police protection, or expediting utility services. Because the money goes straight to the official, facilitating payments qualify as bribes, and it is against our policy to pay them.



ANTI-CORRUPTION AND BRIBERY

As part of our commitment to winning business the right way, Motiva does not and will not tolerate bribery in any form. Even if we lose business or encounter delays because of our refusal to do so, we do not tolerate bribes, either directly or indirectly (such as through an agent), to any public or private third party, entity or organization, including foreign officials, foreign political parties and foreign international organizations. We abide by all international laws, treaties, and regulations that forbid bribery, including the Foreign Corrupt Practices Act.

If you are working with a government official, be especially cautious. A “government official” can be a national or local government official or employee, a political candidate, a representative of an organization like the World Bank, or an official or employee of government-owned or government-controlled entities (such as state-owned oil companies). If you have any questions about whether the person with whom you are interacting could be considered a government official, contact Motiva Legal right away.

Important Note:

We may not hire a third party to do something that we cannot ethically or legally do ourselves. Engaging a third party to indirectly make an improper payment violates this Code and anti-corruption laws. We must carefully screen all third parties, using our due diligence procedures, before retaining them.

Learn More



[Anti-Bribery and Anti-Corruption Policy](#)



Our Commitment to the Communities Where We Operate

- Charitable Activities
- Political Activities

CHARITABLE ACTIVITIES

Motiva supports charitable and other corporate social responsibility activities in our local communities. As an employee, you may take part in charitable activities, so long as both the charity or organization and the activity have been approved by management.

The charity or activity must also not appear to be (or otherwise operate as a cover for) a political payment. Without prior approval, you may not send emails attempting to raise money for a charity or any other fundraiser through the Company's network. In addition, you may not use Company assets (including time) for personal charitable pursuits.





POLITICAL ACTIVITIES

In most (if not all) countries, it is illegal to make contributions intended to influence official actions to politicians, political parties, or public officials.

Company funds and resources may not be used to contribute to any political campaign, political party, political candidate, or any of their affiliated organizations. It is important to be particularly cautious in our sales activities where personal connections with a politician or public official are involved.

Only employees authorized by the CEO have the right to represent Motiva's political views. When authorized, it is important to note that certain activities may require disclosure and may be subject to specific rules.

These activities may include, but are not limited to, the following:

- Contacts with legislators, regulators, or executive branch officials, or their staffs
- Communications with government officials
- Efforts to influence legislative or administrative action
- Providing gifts or entertainment to government officials

For any questions or additional guidance contact [Motiva Legal](#).

RESOURCES

If you have questions about our Code or our policies and want to share a concern, there are resources available to help you.

Chief Compliance Officer
compliance@motiva.com

Compliance Hotline
motiva.ethicspoint.com

Human Resources
hroperations@motiva.com

Motiva Legal
motiva-legal@motiva.com

For Media Inquiries:

Motiva Media Desk
mediadesk@motiva.com

713-427-3699



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