

LOOP LLC

Policy Name:	Code of Business Conduct	Effective Date:	1/25/2023
Section of:	Administrative Policies	Review Frequency:	Triennially
Location:		Target Audience:	Employees

LOOP LLC is hereinafter referred to as "the Company."

1.0 Overview

The Company will maintain an effective Code of Business Conduct governing employee actions at the workplace (the "Code").

2.0 Purpose

It is the intent of the Company to conduct business that meets all legal and regulatory requirements and to adhere to high ethical standards. The Company is accountable to a broad range of stakeholders including customers, employees, business partners, communities, and owners.

3.0 Scope

In pursuit of the Company's vision, it is imperative that our employees recognize the importance of conducting business with integrity and ethics. All employees are expected to adhere to the guidance set forth in this Code and all Company policies and procedures. Because the Company's reputation not only depends on its employees but also its business partners, employees must be aware of the business conduct expectations established in this Code.

Employees who violate this Code and related policies are subject to disciplinary action by the Company.

The scope of this Code applies to all Company employees.

4.0 Policy

OUR COMPANY

Mission Statement

Our mission is to increase strategic value to our owners and customers by safely and reliably handling large volumes of petroleum.

Vision

Establish the Clovelly Hub as a Global Petroleum Marketplace.

Guiding Principles

- Excellence in safety and environmental performance beyond regulatory compliance
- Reliability of processes and systems
- Continuous improvement in all facets of the business
- Proactive and responsive in building our client base and capturing high value opportunities
- An exceptional, empowered and aligned workforce
- Responsible citizenship within the community
- Protection of the facilities as a national strategic asset
- Integrity and ethics in all activities

Ethical Standards

The Company and its employees will adhere to the highest ethical standards of conduct in all business activities, and will act in a manner that enhances the Company's standing as a vigorous and ethical competitor within the business community.

Citizenship

The Company and its employees will act as responsible citizens in the communities where the Company does business.

Guidance

This Code is designed to support the Company's upstanding business culture and our overall reputation. It is meant to provide an overview of how the Company expects its employees to conduct business on its behalf.

Along with this Code, the Company has in place policies, procedures, manuals, and other guidance to outline how employees are expected to operate within our Company.

This Code provides an overview of LOOP's Business Integrity Program, illustrating our commitment to protecting our people and the communities where we operate, being good neighbors, respecting our people, and conducting our business ethically and honestly.

Business Integrity

The Company's Business Integrity Department is a resource for advice, guidance, and expectations of employees around ethics, decision-making or behavior within our Company.

- Ask a Question
 - Have a question about a LOOP policy or procedure? Unsure about what a correct business action should be? Please contact one of the resources (below) to seek guidance on the question.
- Report Non-Compliance
 - Employees should report any suspected or known illegal, non-compliant or unethical conduct related in any way to the Company. It is important that matters of non-compliance be brought to the attention of the Business Integrity Department so they can be properly investigated.
- Resources
 - Any Executive
 - Supervisor or Manager
 - Human Resources
 - Legal Department
 - Business Integrity Department
 - LOOP Business Integrity Portal

LOOP Business Integrity Portal ("Portal")

The Portal is a tool where concerns relating to violations of LOOP's Code of Business Conduct or questions related to policies, procedures, or business conduct can be routed to the appropriate persons within the Company, and dealt with in a professional, confidential and timely manner.

- The Portal is available 24 hours a day, 7 days a week, 365 days a year and staffed by an independent third party.
- Anybody can ask a question or submit a report in the Portal

- Everyone has the option to remain anonymous, and all reports and questions are handled confidentially.
- Available via web or phone.
 - LOOP BI Portal <https://www.loopllc.com/LOOP-Social-Contract/Business-Integrity>
 - Telephone 844-235-7409 or
 - Mobile device using QR Code
- Retaliation will not be tolerated



The Company has a Non-Retaliation Policy that prevents actions taken against a person for reporting concerns in good faith. Retaliation will not be tolerated by the Company.

OUR RESPONSIBILITIES

Protection of Assets and Resources

The Company has adopted controls to insure compliance with generally accepted accounting principles, internal needs and the requirements of various other applicable laws and regulations. These controls help to govern management of the Company's assets.

The Company has established systems, controls and records for authorizing, executing, and recording all transactions involving assets and liabilities. In addition, the Company has established physical and administrative controls of access to assets and will periodically reconcile recorded and existing assets. These policies and controls have been established according to internal needs, generally accepted accounting principles, and various laws and regulations.

All Company assets, including Information Technology, should be used for legitimate business purposes. Any information stored on any Company resource is subject to Company monitoring. Minimal personal use of Company resources is allowed in accordance with the Acceptable Use Policy or thorough appropriate Company approvals.

- Compliance
 - No officer, employee, or other person acting on behalf of the Company will engage in any activity that circumvents the Company's systems of internal controls.
- Illegal Payments
 - No officer, employee, or other person acting on behalf of the Company will in any way offer, make or cause to be offered or made, illegal payments, illegal contributions or other illegal disbursements or gifts.
- Internal Accounting Controls
 - Accounting practices are to be conducted within the internal accounting control requirements of the Foreign Corrupt Practices Act and related regulations.
- Cash Disbursements
 - Company Policy prohibits cash disbursements except for nominal disbursements drawn from established and properly recorded petty cash accounts. All checks will be drawn only to the ultimate payee. No checks will be drawn to cash or bearer. A procedure exists for granting exceptions of this Code, but the Company's Vice-President Finance and Administration must approve the expected transaction or transactions in advance.
- Reporting and Review Procedure
 - Any officer, employee, or other agent of the Company must report a transaction that they believe may be illegal. When a report is made, the Company will investigate the report to determine appropriate actions to be taken.

Insider Information

In the normal course of business, some employees may have access to information about the oil and gas industry or companies in the industry, including the Company's owners, before it becomes public knowledge. Until this information is released to the public, this knowledge is considered "insider" information and must be kept confidential. Acting on this information for personal gain or releasing it to anyone else prior to its effective disclosure to the general public is in violation of Federal law and Company policy.

No employee may act on this information or release it to anyone else including relatives, friends, co-workers, or stockholders, until the information has been disclosed publicly and the public has had time to react to it. While the nature of their duties means that some employees have greater knowledge or access than others, the rules apply to anyone who has direct or indirect access to significant non-public information.

The personal use of insider information is also considered a fraud against the Company and against the other members of the investing public who suffer because, although they do not have access to the information, they trade in the same market as those who do. Federal securities laws are designed to protect the public by preventing anyone with access to insider information from exploiting this knowledge.

Penalties may include:

- Criminal fines and imprisonment.
- Judgment in favor of a damaged investor ordering the violator to pay over any profits made from trading on the information, and possible payment of damages.
- In certain cases, judgment in favor of the Company ordering the violator to pay over any profits made from the transaction, and possible payment of damages.
- Court injunction.
- Civil penalties of up to three times the amount of profit gained or loss avoided.

Insider Information Guidelines:

- A. Insider information should be shared only with those people inside the Company whose jobs require them to have the information.
- B. Do not disclose sensitive or non-public information to anyone outside the Company. Such information specifically includes, but is not limited to the Company's actual crude oil inventory or capacity to store crude oil, and any contractual right to store crude oil at Company facilities which may be held by any other entity, The Company has procedures for the release of such information. No disclosure should be made without following these procedures.
- C. You should not buy or sell Company bonds, stock, options, other Company securities, or direct someone else to buy or sell these for you when you have knowledge of insider information which has not been made public. You cannot act on the information until the public has had time to react to it.
- D. You should not trade in another company's bonds, stock, options, or other securities if you believe that LOOP's plans or activities will affect its value.
- E. Employees shall not trade, either directly or indirectly through others, in LOOP Gulf Coast Sour Crude Oil Futures or LOOP Crude Oil Storage Futures Contracts, or any related securities, because of the potential to acquire non-public information which could affect the price or volume of such instruments.

Equal Opportunity

The Company recognizes that its greatest strength lies in the talent and the ability of its employees. These goals have been established to guide the Company's activities in employee relations. It is the Company's on-going policy:

- To provide equal opportunity for employment and advancement on the basis of ability and aptitude without regard to any protected characteristic, including: race, religion, sex (including pregnancy), national origin, age (40 or older), disability or genetic information.
- To protect the health and safety of employees in their work environment.
- To compensate employees fairly, according to their performance, and to provide equitable benefits within the framework of prevailing practices.

Additionally, as an Equal Opportunity Employer, the Company also supports equal opportunity by seeking out and purchasing materials and supplies from minority-owned business.

Harassment and Discrimination

LOOP is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including sexual harassment. Therefore, the Company expects all relationships among persons throughout the Company will be business-like, free of bias, discrimination, prejudice, and harassment.

Harassment on the basis of any protected characteristic is strictly prohibited.

The Company encourages the reporting of all perceived incidents of discrimination, sexual harassment, harassment, or retaliation, regardless of the offender's identity or position. Individuals who believe that they have been the target of such conduct must raise their concerns to any Executive, their Supervisor or Manager (if appropriate), Human Resources, the Legal Department, the Business Integrity Department or the LOOP Business Integrity Portal.

Environmental, Health and Safety

As a responsible corporate citizen, the Company is committed to compliance with all applicable federal, state, and local environmental laws and regulations that affect its operations. The Company will make every effort to assure that its products and places of business are safe for the public and its employees. But a healthy and safe work place and environment is not just the responsibility of the Company or Management, it demands the attention of each and every employee.

All employees must follow Company policies and directives relating to matters of health, safety, and maintenance of environmental standards. Employees are also expected to use common sense and good judgment in dealing with environmental and safety problems.

Employee Responsibilities:

- Compliance with Company safety standards and procedures.
- Working toward the elimination of all environmental and safety hazards.
- Promptly responding to an environmental, health, or safety problem and reporting it to your Supervisor.
- Managing hazardous waste and similar materials in strict compliance with all applicable laws, regulations, and Company policies.

INFORMATION AND COMMUNICATION

Protection of Business Information

Confidential Information

One of Company's most valuable assets is our body of business information. The widespread use of computer terminals and computer systems has caused this information to be accessible by many employees and failure to adequately protect this corporate information may place the Company at a disadvantage in the marketplace. Each employee shares in the responsibility of treating all proprietary and other **confidential information** in a secure manner and must take steps to protect information that has been entrusted to him/her. Ask your Supervisor if you are unsure of what is sensitive and confidential information in your particular area and how to treat it.

Documents containing confidential or sensitive data should be handled carefully during working hours and must be properly secured at the end of the business day.

Particular attention must be paid to the security of the data stored on Company computer systems. You must maintain the secrecy of your password and lock the equipment when not in use. If you observe individuals that you do not recognize using terminals in your area, immediately report this to your Supervisor.

Copyrights

Company also copyrights many of its manuals and other documents. The copyright reflects Company's ownership of the documents. A copyrighted document may not be reproduced without the written consent of Company. A violation of the copyright rules will result in disciplinary action and/or litigation to protect Company's rights.

Shipper Information Disclosure

The Interstate Commerce Act prohibits the disclosure to any person or corporation, other than the shipper or consignee, of any information concerning the nature, kind, quantity, destination, consignee, or routing of any property tendered or delivered to an oil pipeline for interstate transportation, which information may be used to the detriment or prejudice of such shipper or consignee or which may improperly disclose his business transactions to a competitor. All inquiries regarding such shipper information, usually from parties desiring to affect a trade, should be directed to the Scheduling Department for handling.

In some instances, there are requests for general tanker information that does not involve identifying a shipper or consignee or the cargo itself, such as tanker arrival or departure time from a lightering, bunkering, or service vessel operation. This information may generally be disseminated to parties with such a business interest, without referral to the Scheduling Department. However, in the event there exists any uncertainty regarding the identity of a caller or the motive underlying a request for information, the caller should be referred to the Scheduling Department.

Disclosure

Company employees are required, while employed and after separation of employment, not to disclose confidential information, documents or processes.

This requirement includes, but is not limited to:

- Not disclosing any confidential information to any individual or business entity in any manner or form except as required in the course of your employment with the Company.

- Not participating directly or indirectly, in the unauthorized use or disclosure of any confidential information and not to use confidential information in any way that harms the Company or diminishes the value of the confidential information to
- Taking reasonable precautions to safeguard the Company's confidential information in order to prevent its unauthorized disclosure to any person or entity outside of the Company.

A breach of the duty of confidentiality will result in disciplinary action and/or in litigation to protect Company's rights.

Media Relations

All requests by representatives of the news media for information concerning the Company's position on public issues should be referred to a Company officer.

In addition, employees may not release information to the news media about Company activities or the activities of other employees. The Company has established systems and procedures for responding to news media requests and for obtaining Management approval for public statements. If an activity merits or requires public disclosure, a Company Officer, on approval of the President, will handle its release to the media.

Social media postings should be in compliance with the Company's Acceptable Use Policy. Blogging and social networking are allowed provided that:

- It complies with all other Company policies
- It is professional and responsible in manner
- Confidential data is not disclosed
- No information detrimental to the Company or Company business is published

Ownership of Work Product

All work which is created, preformed or prepared by employees while working for the Company, whether part of a specific job assignment from the Company or the product of ideas unrelated to a specific job assignment, shall be the property of, and owned by the Company.

MANAGING THIRD-PARTY AND OUTSIDE RISK

Antitrust

Antitrust laws are designed to preserve and foster fair and honest competition within the free enterprise system. To accomplish this goal, the language of these laws is deliberately broad, prohibiting such activities as "unfair methods of competition", and agreements in "restraint of trade". Such language gives enforcement agencies the right to examine many different business activities to judge their effect on competition.

Company policy requires full compliance with the letter and spirit of all applicable antitrust laws. No employee, under any circumstances, has the authority to authorize a violation of the law. Anyone who violates the law, or knowingly permits a subordinate to do so, is subject to disciplinary action, up to and including demotion or dismissal.

Penalties for antitrust violations are severe for the Company and for the individual. Penalties may include the following:

- Imprisonment of the individual for up to three (3) years.
- Fines against the Company of up to \$1,000,000 and against the individual of up to \$100,000 for each criminal offense.
- Payment of treble damages, plus attorney's fees and litigation costs, to firms or individuals injured by the violation.

- Injunctions or consent decrees prohibiting certain activities. Consent decrees can seriously limit a firm's future freedom to engage in business activity and can be applied across a broader scope than was involved in the original violation.

Principal Laws

It is important for you to have basic knowledge and understanding of antitrust laws. The principal Federal Antitrust Laws include the Sherman Act and the Robinson-Patman Act. The examples mentioned here do not include every instance in which these Federal laws or other State Antitrust Laws may apply.

If you have questions or are uncertain about how the law may apply to a specific activity, seek advice from your Supervisor, Legal Department, Business Integrity Coordinator or submit your question to the LOOP Ethics and Business Integrity Portal. We want you to ask questions and seek advice.

Two areas where antitrust violations may occur are in relations with competitors and with customers.

Relations with Competitors

The greatest danger for violations of the antitrust law rests in contacts with competitors. The laws make illegal any agreement or understanding, expressed or implied, written or oral, that restricts competition or interferes with the ability of the free market system to function properly. In the eyes of the law, good intentions, customer or consumer benefits do not justify or excuse violations. Communications between representatives of competitors should be avoided unless they concern a true customer-supplier relationship, other legitimate business ventures, or limited and necessary trade association activities. A formal agreement with a competitor need not exist to prove a conspiracy. A general discussion followed by common action often is enough to show implied agreement. In an investigation, every communication, written or oral, is subject to extreme scrutiny.

You must not engage in any communication with competitors that could result or even appear to result, in any of the following: price-fixing, bid rigging (including "complimentary bidding"), allocation of customers or markets, boycotts, or production limits to restrain trade. This even includes contact with firms or persons who are not competitors of the Company, but who may compete among themselves.

The antitrust laws recognize your need to be aware of market conditions, and you may discuss these with customers, retailers, wholesalers, and brokers, provided they are not your competitors.

Relations with Customers

Generally speaking, you have an unrestricted right to choose your customers. But there are antitrust pitfalls in this area, too. The biggest danger is an allegation that, through an understanding or threat, you have improperly restricted a customer's freedom to operate. In other words, a customer may claim he was unable to determine freely his own prices, terms of sale, sales territories or his customers, or that his right to use other suppliers was restricted.

By law, sellers cannot interfere with the customer's freedom to determine his own resale prices or such related items as cash discounts, profit margins, differentials and terms, and conditions of sale. Resale price-fixing agreements can be proved by circumstantial evidence, and any criticism or even mention of a customer's price level can be construed as a threat. Discussions of one customer's prices with another also can be interpreted as an implied demand and should be avoided.

The preceding discussion is by no means an exhaustive review of areas where antitrust laws apply. If you should have questions about a specific business activity, consult your Supervisor, the Company's Legal Department, or the LOOP Business Integrity Portal. Remember that we want you to ask questions.

Political Activities

The Company encourages employees to participate in the American political process, as they so desire. They may make personal political contributions or communicate their personal beliefs to elected officials.

It is important, however, to distinguish between personal and corporate political activities. As a responsible corporate citizen, the Company may speak out on issues of importance to the Company.

Senior Management is responsible for developing the Company's position on relevant legislative and regulatory issues, and is responsible for communicating these positions to government officials as directed by the President.

Unless you are specifically requested by the Company to represent it before legislative or other government bodies, be sure you clearly label any personal communication with legislators as your own beliefs. If legislators or regulators regarding the Company's position on public issues contact you, you should refer them to the Company's General Counsel.

Participation in the political process is one of every American's most basic rights. Federal and State laws, however, limit the nature and extent of individual and corporate political participation. For example, Federal law and that of many states limit or prohibit corporate contributions to political candidates or officeholders.

Federal law and Company policy also state that no one will be reimbursed for personal political contributions. Personal compensation will not be altered in any way, under any circumstances, to reflect such contributions.

Existing federal and state laws provide for the organization of employee political action committees, which may make political contributions on behalf of their members. LOOP has no such committees organized.

Conflicts of Interest

The Company expects its employees to serve the Company with undivided loyalty. Employees should put the Company's interests ahead of any other business and commercial interest you may have as an individual. Employees should also avoid situations in which a conflict of interest could arise.

Generally speaking, employees and closely related family members should not engage in activities that compete with any of the Company's lines of business, provide service or assistance to a competitor, or interfere with the performance of job duties. In addition, you should not use Company assets for your personal gain. In other words, the work you do for the Company belongs to the Company. You may not exploit inventions, patents, or copyrights belonging to the Company.

This Code is based on the legal principle that requires directors, officers, and employees who handle Company money or property, or who transact Company business, to serve the Company with undivided loyalty. These individuals are strictly prohibited from taking what in all fairness belongs to the Company. If a business opportunity should belong to the Company, taking it for personal gain is similar to taking a corporate asset.

Specifically, you and your closely related family members should not participate in any of the following activities without prior written approval:

- Accepting a directorship or other position in any competing business.
- Accepting a directorship or other position in any business that supplies goods or services to the Company.
- Engaging in a business that is in competition with the Company.

- Using Company copyrights or trade names without permission.
- Engaging in land or property transactions in which the Company may have an indirect or direct interest.
- Acquiring equity interest, including stock or stock options, in businesses engaged in sales to the Company.
- Speculative trading in LOOP Sour Crude Oil Futures

Trading in publicly traded securities usually is not a conflict of interest. If you have any questions about this Code, contact the Company's General Counsel.

Additionally, the Company also encourages employees to become active citizens in their communities. Employees should use their good judgment to assure that their participation does not conflict with their responsibilities to the Company.

All of the Company's activities must be performed based on the highest ethical standards. To assure this goal, employees should also avoid any relationship with other businesses that could impair or unduly influence their ability to discharge their duties properly. The appearance of a conflict can often be as damaging as an actual conflict.

A good rule is to avoid any action or association that would be embarrassing to the employee or the Company if it were disclosed to the public.

Meals, Gifts and Entertainment (MGE)

The exchange of gifts, meals or entertainment ("Business Courtesy"), when handled appropriately, can support better relationships with business associates. However, a Business Courtesy may present an integrity concern if a competitive, regulatory, or adversarial relationship should exist, or if the exchange will or appears to obligate or unduly influence the recipient's behavior or decision-making.

- ***MGE Threshold - Before accepting or offering gifts worth \$150 or more and meals or entertainment worth \$200 or more, employees must receive approval from the employee's manager and register a Conflict of Interest Disclosure form directly with the Business Integrity department or through the Business Integrity Portal.***

For any Business Courtesy that satisfies the MGE Threshold, the Company encourages employees to think about how the activity may be perceived by others and what kind of example the exchange may be setting. Additional considerations include:

- ***Additional Considerations*** – Consider the appropriateness of the Business Courtesy in light of these factors:
 - There must always be a clear business purpose involved and Company employees in attendance for any meal or entertainment events.
 - If lavish, frequent, or unusual for the employee's position or business custom, it is probably not acceptable.
 - Extra care is merited before accepting any Business Courtesy when employees are involved in contract negotiations or bid evaluations.
- ***Prohibited Activities*** - Employees must not give nor receive any of the following:
 - Gifts of cash, or loan of cash or securities.
 - Entertainment of an unlawful, lewd or offensive nature.
 - Anything of value based on the quantity or volume of merchandise or services purchased or acquired.
 - Anything of value exchanged for a specific decision or outcome, or offered with the expectation that it will unduly influence any decision to benefit the giver.

- Gifts, entertainment or free or discounted personal services should never be solicited or requested.

Any questions regarding a Business Courtesy should be directed to the Business Integrity department.

Anti-Bribery and Anti-Corruption Laws

Many countries have anti-bribery and anti-corruption laws which forbid bribes to government officials. In the United States, these prohibitions are incorporated into the Foreign Corrupt Practices Act (FCPA). The FCPA has two basic parts: (1) the anti-bribery provisions and (2) accounting and recordkeeping requirements. Contrary to common belief, the FCPA may apply equally to domestic and foreign companies and individuals, citizens and noncitizens, located within or outside the US.

The FCPA's anti-bribery provisions make it illegal to corruptly offer or provide money or anything else of value to officials of foreign governments with the intent to obtain, direct or retain business. "Foreign government official" is broadly defined to include employees of foreign government-owned business, such as national oil companies, a foreign political party, party official, or candidate for political office or public international organizations. "Anything of value" can include cash or other items such as sports tickets, travel and entertainment, charitable donations, and even seemingly inconsequential items as flowers and small gifts.

The FCPA's accounting and recordkeeping provisions apply to domestic and foreign operations of publicly traded companies. These requirements act as a control system to complement the anti-bribery section and are primarily intended to prevent or detect unreported slush funds or illegal payments. While the accounting provisions basically are a restatement of generally accepted accounting principles, it is important to understand that strict accuracy in documentation and reporting is required. These provisions can be interpreted to include relatively small sums from petty cash funds.

You must consult with the Legal Department as soon as possible if you require guidance or are concerned that there is or might be a potential violation of applicable anti-bribery or anti-corruption laws, including the FCPA.

Violations of the FCPA may result in civil and criminal fines and penalties for the Company and individuals and imprisonment for individual. The FCPA does not allow the Company to reimburse individuals for any fines or penalties imposed under the FCPA.

International Trade Restrictions and Boycotts

The regulations require that requests to participate in a boycott be promptly reported to the Government. Requests to participate in a boycott can be found in almost any business document including contracts, requests to bid, letters of credit, purchase orders, and questionnaires which seek information about potential suppliers. All documents should be thoroughly reviewed for boycott language, being particularly alert for words like "boycott", "blacklist", and provisions that prohibit the importation of goods from certain countries or that require goods be shipped on vessels that are able to enter ports of particular countries.

If any document contains language that you believe may be boycott-related, immediately contact the Company's General Counsel before completing the transaction. Trade between American companies and government-sanctioned countries is prohibited. The country's prohibitions may also apply to foreign affiliates of American companies. The U.S. government revises the list of countries subject to these restrictions and prohibitions from time to time; current information may be obtained from the Company's Legal Department.

You should consult with the Company's Legal Department before any business relationships are established with any of these countries. The prohibited countries may change from time to time.

Compliance with boycott requests, failure to promptly report the receipt of boycott requests and trading with the named countries can subject the Company to severe penalties.

The ability of American companies and their foreign affiliates to trade in the world market is occasionally restricted by regulations issued by the Government of the United States. For example, American companies are prohibited from participating in economic boycotts directed against friendly countries, and trade with certain countries is restricted or prohibited.

Detailed and complex regulations have been adopted that prohibit the taking of any action that may support a boycott. The regulations prohibit the Company or any of its employees from refusing to do business with anyone based upon race, religion, sex, or national origin, and from providing information concerning these matters about its employees to customers or potential customers. They also prohibit the providing of information about relationships that the Company may have with a boycotted country.

5.0 Enforcement

This Code will be enforced by Company Management. Code violations will result in disciplinary action, which may include suspension or more severe penalties up to and including termination of employment. Disciplinary action will be administered by the Director of Human Resources, Safety and Security. If any provision of this Code is found to be unenforceable or voided for any reason, such invalidation will not affect any remaining provisions, which will remain in force.

6.0 Definitions

<i>Boycott</i>	Is an act of voluntarily abstaining from using, buying, or dealing with a person, organization, or country as an expression of protest, usually for political reasons. It can be a form of consumer activism.
<i>Close relative</i>	Includes spouse, child, step-children, parents, step-father, step-mother, grandparent, grandchild, father-in-law, mother-in-law, brother, sister, brother-in-law, and sister-in-law exclusively or “half” relationships.
<i>Confidential Information</i>	Any and all information that is non-public, proprietary and/or generally not known to the public, or that LOOP has specifically identified as “Confidential”. Confidential information includes information related to LOOP’s business and operations such as: any and all information relating to LOOP’s services, technology, business affairs, methods, strategies, formulas, future planning, cost data, computer programs, scientific or technical know-how, financial, manuals relating to operations or maintenance of its facilities or its components, marketing and other business information, strategic planning documents, any and all vendor and customer information, customer throughput, contract rates, inventories, connecting carrier throughput, and segregations whether such information be tangible, intangible, intellectual or otherwise. In addition to information that currently exists, confidential information shall include information that is developed in the future whether disclosed to you or to which you have access.

<i>Conflict of Interest</i>	A conflict of interest occurs when an individual or organization is involved in multiple interests, one of which could possibly corrupt the motivation for an act in the other.
<i>Copyright</i>	A legal concept, enacted by most governments, giving the creator of an original work exclusive rights to it, usually for a limited time. Generally, it is "the right to copy", but also gives the copyright holder the right to be credited for the work, to determine who may adapt the work to other forms, who may perform the work, who may financially benefit from it, and other related rights.
<i>Harassment</i>	Harassment is unwelcome conduct that is based on race, color, religion, sex (including pregnancy), national origin, age (40 or older), disability or genetic information and where 1) enduring the offensive conduct becomes a condition of continued employment, or 2) the conduct is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive. Harassing conduct includes, but is not limited to, epithets, slurs, or negative stereotyping, threatening, intimidating or hostile acts, denigrating jokes, written or graphic material that denigrates or shows hostility or aversion toward an individual or group that is placed on walls or elsewhere on the employer's premises or circulated in the workplace.
<i>Insider Information</i>	Insider information is considered material if there is a substantial likelihood that you or another reasonable investor would consider the information important in deciding whether or not to buy, sell, or hold the company's bonds, stock, options, or other company securities, or related instruments such as LOOP Sour Crude Oil Futures.
<i>Interstate Commerce Act</i>	A federal law that was designed to regulate the railroad industry, particularly its monopolistic practices. The Act required that railroad rates be "reasonable and just," but did not empower the government to fix specific rates. It also required that railroads publicize shipping rates and prohibited short haul/long haul fare discrimination, a form of price discrimination against smaller markets, particularly farmers. The Act created a federal regulatory agency, the Interstate Commerce Commission (ICC), which it charged with monitoring railroads to ensure that they complied with the new regulations. The Act was the first federal law to regulate private industry in the United States. It was later amended to regulate other modes of transportation and commerce.
<i>Loyalty</i>	Faithfulness or a devotion to a person, country, group, or cause.
<i>Sexual Harassment</i>	Unwelcome sexual advances, requests for sexual favors, and other verbal or physical harassment of a sexual nature, and can include offensive remarks about a person's sex. Both the target and the harasser can be either a woman or a man, and the target and harasser can be the same sex. Simple teasing, offhand comments, or isolated incidents that are not very serious are not considered harassment. The behavior must be

	<p>so frequent or severe that it creates a hostile or offensive work environment or when it results in an adverse employment decision (such as the target being fired or demoted).</p> <p>The harasser can be the target’s supervisor, a supervisor in another area, a co-worker, or someone who is not an employee of the employer, such as a client or customer.</p>
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7.0 Roles and Responsibilities

ROLE	FUNCTIONAL RESPONSIBILITIES
Employees	<p>Shall comply with this Code, as well as all applicable laws and rules.</p> <p>Any employee who feels that he or she may be entering into or have an existing conflict of interest with the Company’s business purpose or interests should immediately contact the Company’s Business Integrity Coordinator and request a conflict-of-interest review to avoid any impropriety or the perception of impropriety.</p> <p>Annually complete Code training, review the Code of Business Conduct and acknowledge that the employee has read, understands and agrees to comply with this Code.</p>
Supervisor/Business Integrity Coordinator	<p>Respond to requests by employees concerning the Code of Business Conduct.</p> <p>Provide guidance to employees as it relates to this Code and conduct conflict of interest review, as requested.</p> <p>Monitor and manage reports received into the LOOP Ethics and Business Integrity portal and respond as necessary.</p>
Chief Compliance Officer	<p>Conduct periodic monitoring and compliance reviews of the Code to ensure it meets with all applicable regulations and/ or legislation.</p>
Vice President Human Resources, Regulatory, Safety and Security	<p>Conduct enforcement of this Code by effecting discipline as required under LOOP’s Disciplinary Policy.</p> <p>Annually circulate the Code of Business Conduct and Reaffirmation of Ethical Standards form to all employees.</p>
Management	<p>Company’s Management, which includes supervisors, superintendents, managers, directors, and executives, shall have the responsibility to explain and enforce the Code.</p> <p>Lead by example and demonstrate personal commitment to the Code.</p> <p>Ensure that employees who raise good faith questions or potential infractions of the Code face no retaliation.</p>

Review Initiated Date	Subject Matter Review By/Date	Manager Review By/Date	Executive Review By/Date	Re-Issue /Revised Effective Date
1/1/2012	5/10/2012	KPK 4/25/2012		6/1/2012
1/1/2014	1/31/2014	TDE 2/15/2014		3/1/2014
1/1/2017	3/1/2017	CCG 2/28/2017		3/1/2017
7/1/2018	7/1/2018	MCG 1/8/2019		1/10/2019
12/9/2020	12/9/2020	MCG 12/9/2020		12/11/2020
10/25/2022	12/15/2022	MCG		1/25/2023

8.0 Related Policies, Procedures, and Documents

- Non-Retaliation Policy
- All other policies as referenced in the Code

9.0 Policy Signoff

Approved:

M. C. Garrison



Chief Compliance Officer

E. A. Priestley



Vice President Human Resources, Regulatory, Safety and Security