



# VENDOR CODE OF BUSINESS CONDUCT AND ETHICS

Calumet, Inc. and its affiliates (“Calumet”) are committed to conducting our business in compliance with both applicable law and the highest ethical standards.

Calumet engages third parties (“Vendors”) to provide products and services to Calumet. As part of its commitment to appropriate business conduct and ethics, Calumet strives to engage only those Vendors who share our commitment to compliance. Calumet expects and holds its Vendors accountable for conducting business honestly and responsibly, as well as complying with applicable law and regulations

Calumet has provided the following Vendor Code of Business Conduct and Ethics to ensure that our Vendors are aware of the expectations Calumet has for itself, its employees, and its vendors.

Calumet’s Code of Business Conduct and Ethics is available at: <https://calumet.investorroom.com/ethics>

Calumet expects its Vendors to integrate, communicate, and apply the principles found in this Vendor Code of Business Conduct and Ethics into their operations, especially with respect to their business dealings with Calumet.

Calumet’s culture of compliance is critical to its success, and we know that the vast majority of our employees and vendors embrace that culture by adhering to our high ethical standards. However, on rare occasion, isolated employees or Vendors may attempt to violate the Code of Business Conduct and Ethics or Calumet’s Vendor Code of Business Conduct and Ethics. If you, as a Vendor of Calumet, feel someone at Calumet or another Vendor or potential vendor is engaged in illegal, unethical, or other improper conduct, Calumet asks that you take action by reporting your concerns to your point of contact within Calumet or to our Ethics Helpline. Your report will always be taken seriously, and we will investigate the issue to ensure that all parties are compliant with the law and our ethical standards.

If you would like to remain anonymous in reporting your concern:

- Call the Ethics Helpline at 1-844-836-2503 or go online at <https://ethics.ipm.starcompliance.com/>. The Ethics Helpline is staffed by an external provider 24 hours a day, 7 days a week.
- The report is then sent to Calumet’s Corporate Compliance Officer or Audit Committee, for review, investigation, or other appropriate action.

## VENDOR BUSINESS RELATIONSHIPS WITH CALUMET

Calumet selects its Vendors based on the ability of the Vendor to add value to Calumet through provision of goods or services, regardless of whether that Vendor in turn will purchase any products from Calumet. Calumet may consider the following factors in its business decisions: A Vendor’s competitive pricing, quality of services and materials provided by the Vendor, a Vendor’s ability to timely perform, and whether the Vendor agrees to abide by this Vendor Code of Business Conduct and Ethics.

In addition to this Vendor Code of Business Conduct and Ethics defining expectations for Calumet’s Vendors, Calumet defines its ethical expectations for employees in the Calumet Code of Business Conduct and Ethics.

In order to promote legal compliance and ethical conduct among its employees and Vendors, Calumet has the following expectations:



# VENDOR CODE OF BUSINESS CONDUCT AND ETHICS

## Conflicts of Interest

All business decisions made by Calumet employees must be free from any conflict of interest and should appear impartial. A conflict of interest occurs when an employee or Vendor's private activities conflict or appear to conflict with his or her responsibilities to Calumet. All employee conflicts of interest, including those involving Vendors, must be disclosed fully in writing to the employee's supervisor and to Calumet's Corporate Compliance Officer for review as soon as the conflict is known.

Vendors must avoid interactions with Calumet employees that create or appear to create conflicts of interest. Vendors should never provide incentives or offers of employment to Calumet employees, their families, or their friends in an effort to obtain or maintain a business relationship with Calumet.

## Gifts and Entertainment

Calumet recognizes that gifts and entertainment can play an important role in business relationships, especially those involving our Vendors. However, Calumet employees are limited in their ability to accept gifts and entertainment from Vendors, and business entertainment expenditures are monitored closely. Under the Calumet Code of Business Conduct and Ethics and Calumet's Travel and Entertainment Policy:

- Entertainment, gifts, or other gratuities must have a legitimate business purpose.
- Entertainment must be legal, reasonable, and consistent with legal and ethical limitations. All Calumet business entertainment expenditures must be made in compliance with the provisions and intent of the Calumet Code of Business Conduct and Ethics, as well as the Calumet Travel and Entertainment Policy.
- Calumet employees may only accept gifts of nominal value. Preferably, employees will never accept any gifts. Where acceptance is required. Gifts to or from a single vendor must not exceed \$250 during one fiscal year.
- Calumet employees must not solicit loans, gifts, or favors from Vendors.
- Calumet employees must record all business entertainment expenses and receive approval from a supervisor for such expenditures.

## VENDOR CONDUCT

Calumet's foundation is built on abiding by the law, treating employees and contractors fairly and with respect, protecting the environment, and benefiting the communities where we work. Calumet strives to engage Vendors who embrace and abide by these values in their operations.

At a minimum, Calumet expects that its Vendors will abide by applicable laws, rules, and regulations in all their business dealings and operations.

Calumet is committed to abiding by a higher standard of ethical conduct, and seeks out Vendors who are likewise committed to complying with the following conduct requirements:

## Commitment to Legal and Ethical Business Conduct

Vendors must conduct business ethically and always ensure that their operations are compliant with the law.

- **Professional Standard of Care**  
Vendors must act in good faith and should not quote, provide, or continue to provide goods or services that are not in Calumet's best interest or do not add value to Calumet. If a Vendor becomes aware that an aspect of its work is no longer in Calumet's best interest or that it does not add value to Calumet, the Vendor should contact Calumet immediately and stop work if necessary, until appropriate guidance is obtained.
- **Accurate Accounting and Business Records**  
Vendors will maintain, and provide to Calumet as requested, accurate records of all aspects of their business with Calumet.
- **No Bribery, Corruption, Extortion, or Embezzlement**  
Calumet does not condone bribery, corruption, extortion, or embezzlement of any kind. Accordingly, Calumet requires its Vendors not to engage in any of these behaviors, and to comply with the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, and all other local, national, or applicable laws dealing with bribery of governmental employees or officials.
- **Fair Competition**  
Vendors must abide by all applicable fair competition and antitrust laws.
- **Sanctioned Parties**  
Vendors must not source services or equipment from individuals or entities, that are individually or by reason of their location, subject to economic sanctions, prohibitions, or other restrictions imposed by the U.S. or the U.N.
- **Data Privacy, Information Security, and Intellectual Property**  
Vendors must protect sensitive data and confidential information they receive or are made aware of through interactions with Calumet, including, but not limited to intellectual property, customer information, employee information, technology, and trade secrets. Transfer of these types of information must be undertaken only when necessary precautions are in place and due care is exercised.

## Commitment to Employees

Calumet is committed to providing a work environment where all employees are treated fairly and with respect. Likewise, we expect our Vendors to similarly cultivate respectful work environments by:

- Respecting freedom of association and collective bargaining rights, and abiding with applicable laws related to labor unions;
- Never discriminating in hiring, employment, or compensation based on race, sex, religion, color, sexual orientation, disability, age, national origin, gender identity, gender expression, genetic information, veteran status, political preference, or membership or non-membership in any lawful organization;
- Creating a workplace free of harassment or any other form of abuse, including sexual harassment or abuse through compliance with all applicable laws regarding harassment and abuse;



# VENDOR CODE OF BUSINESS CONDUCT AND ETHICS

- Preventing involuntary or under age labor and refusing to engage in human trafficking, slavery, child labor, prison labor, indentured labor, or bonded labor; and
- Establishing appropriate work hours and wages through compliance with applicable laws and regulations regarding work hours, overtime, wages, and benefits.

## Commitment to Health, Safety and the Environment

Protecting people and the environment is a key value at Calumet. Calumet's policy is to protect the health and safety of people and the quality of the environment and to conduct our operations reliably and efficiently. Accordingly, Calumet's Vendors must be similarly committed to protecting their employees, the environment, and the communities in which they operate by:

- Respecting the environment through compliance with all applicable environmental laws;
- Implementing waste and emissions systems to ensure that waste, air emissions, and wastewater discharges are minimized and managed safely and appropriately;
- Protecting health and safety by providing appropriate training, protocols, controls, procedures, and equipment; and
- Implementing and abiding by health and safety rules and regulations to ensure employee safety and health.

## Commitment to Compliance

Calumet expects its Vendors to demonstrate their commitment to compliance with this Vendor Code of Business Conduct and Ethics, as well as applicable laws, rules, and regulations, by implementing systems and protocols necessary to ensure compliance. Vendors should also apply this Vendor Code of Business Conduct and Ethics or other similar principles in dealings with subcontractors and suppliers used in connection with Calumet business.

*Calumet reserves the right to assess, investigate, and monitor Vendor compliance with this Vendor Code of Conduct. Vendors who fail to comply will be expected to take corrective action, or Calumet may not consider them for future business.*

## REPORTING YOUR CONCERNS

Calumet expects its employees, Vendors, and any others who interact with Calumet to seek guidance regarding the Calumet Code of Business Conduct and Ethics, this Vendor Code of Business Conduct and Ethics, or applicable laws and regulations whenever clarification is needed. Vendors should always feel free to raise concerns regarding activities, practices, or incidents involving violations of the Calumet Code of Business Conduct and Ethics, this Vendor Code of Business Conduct and Ethics, or any applicable law, rule or regulation.

To help make reporting easy and confidential, Calumet offers an Ethics Helpline operated by an independent third party, in addition to access to Calumet's Corporate Compliance Officer if you prefer to speak directly with Calumet's executive team.



# VENDOR CODE OF BUSINESS CONDUCT AND ETHICS

## Calumet Ethics Helpline

Reports are confidential and may be made anonymously where permitted by law. Just dial 1-844-836-2503 to speak to an independent third-party representative, 24 hours a day, seven days a week. You may also go online to report a concern at <https://ethics.ipm.starcompliance.com/>.

Concerns may be reported directly to Calumet's Corporate Compliance Officer. Reports are confidential but not anonymous when made directly to the Corporate Compliance Officer.

**Phone:** 1-844-836-2503

**Website:** <https://ethics.ipm.starcompliance.com/>

**Email:** [compliance@calumet.com](mailto:compliance@calumet.com)

**Mail:** **Corporate Compliance Officer**  
Calumet, Inc.  
1060 N Capitol Ave Suite 6-401  
Indianapolis, IN 46204