

	Conflict Minerals Policy	Legal - DK	
		Content Owner: Paralegal II	
		Executive Sponsor: Denise McWatters, EVP, General Counsel & Corporate Secretary	
		Effective Date 09/01/2020	Version: 1

1.0 PURPOSE

It is the policy of Delek US Holdings, Inc. to conduct business honestly, ethically and in compliance with all applicable laws and regulations. The U.S. Securities and Exchange Commission's (SEC) [rule on "conflict minerals"](#) requires disclosure to the SEC by publicly traded companies if they manufacture or contract to manufacture products that contain tantalum, tin, tungsten, or gold (collectively, "3TG") originating from non-certified mines in the Democratic Republic of the Congo and adjoining neighboring countries (the "SEC Rule").

2.0 SCOPE

Company-wide. This Policy applies to all employees of Delek US Holdings, Inc., its subsidiaries, and its affiliates ("Delek" or the "Company"), as well as officers and directors of the Company. This Policy also applies to all third parties working on behalf of Delek in any capacity, including vendors and contractors ("Third Party").

Failure to comply with this Policy may result in disciplinary action, up to and including termination of employment and/or termination of the contract or relationship with the Third-Party.

3.0 POLICY

- 3.1 Delek is committed to not directly purchasing, and will make reasonable efforts to avoid contracting to manufacture, products that contain 3TG from countries covered by the SEC Rule.
- 3.2 Delek requires its suppliers to comply with the SEC Rule, and to maintain documentation demonstrating their compliance with the SEC Rule, which shall be provided to be Delek at its request.
- 3.3 Delek expects its suppliers to implement similar policies with their suppliers to ensure a robust, conflict-free supply chain.

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4.0 RESPONSIBILITIES & AUTHORITY

- 4.1 All Delek employees, officers, and directors are responsible for compliance with this Policy. Questions about the Policy should be directed to the Senior Lead Counsel (Securities) in the Legal Department.
- 4.2 Potential or actual violations of this Policy should be reported without fear of retaliation to any of the following resources:
- Management;
 - Supply Chain;
 - Human Resources;
 - Internal Audit;
 - Legal Department; or
 - The Compliance and Ethics Hotline, available 24/7, through which reports may be made anonymously [online](#) or by phone at 800-867-9267.

Allegations reported to a member of management, Human Resources, or Internal Audit Services must be communicated upon receipt to a member of the Compliance Investigation Review Committee (Chief Human Resources Officer, General Counsel, Vice President, Internal Audit Services, Chief Compliance and Corporate Governance Counsel, Senior Counsel, Compliance or Internal Audit Manager) to be reviewed and assigned in accordance with the Compliance Investigation Procedure.

5.0 RELATED POLICIES

- 5.1 [Code of Business Conduct and Ethics](#)

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