

	Human Rights Policy	Human Resources	
		Content Owner: VP, Human Resources	
		Executive Sponsor: EVP, CHRO Sam Eljaouhari	
		Effective Date 5/20/2025	Version: 5

1.0 PURPOSE

Respecting human rights is a fundamental value to Delek US Holdings, Inc. (“Delek”), as embodied in our Core Values and Code of Business Conduct and Ethics. Delek recognizes the dignity, value and worth of all human beings, and it is committed to conducting its operations in compliance with all applicable laws and regulations and consistent with the Universal Declaration of Human Rights. Delek also expects our suppliers, contractors, and other business partners to conduct their operations in compliance with such dedications.

2.0 SCOPE

Company-wide. This Policy applies to Delek US Holdings, Inc., its subsidiaries, its affiliates and all employees of Delek or its subsidiaries and affiliates (“Delek” or “Company”). The Human Rights Policy is overseen by the Company’s Board of Directors and is included in our Code of Business Conduct and Ethics.

Failure to comply with this Policy may result in disciplinary action up to and including termination from employment.

3.0 POLICY

- 3.1 Delek conducts its business in a manner that respects the rights and dignity of all people, complying with all legal requirements.
- 3.2 Delek respects internationally-recognized human rights, as set out in the UN Universal Declaration on Human Rights, including access to water and sanitation.
- 3.3 Delek knows that respecting human rights includes protecting women’s rights, counting the right to protection from sexual harassment and the right to work with dignity.
- 3.4 Delek recognizes its responsibility to respect human rights and avoid complicity in human rights abuses, as stated in the UN Guiding Principles on Business and Human Rights.
- 3.5 Delek focuses on fairness and inclusion in all aspects of employment, including recruitment, hiring, development, compensation and advancement.
- 3.6 Delek treats everyone who works for the Company fairly and without discrimination. Delek prohibits all forms of discrimination or harassment in the workplace on any legally-recognized basis, including, but not limited to: veteran status, uniformed servicemember status, race, color, religion, sex, age (40 and over), national origin or ancestry, physical or mental disability, genetic information or any other consideration protected by federal, state or local law.
- 3.7 Delek commits to respecting employees’ rights to associate freely, bargain collectively, and provide an opportunity to be heard on labor rights and other issues. Where employees

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wish to be represented by trade unions, the Company cooperates in good faith with the bodies that its employees collectively choose to represent them within the appropriate legal frameworks.

- 3.8 When collective bargaining negotiations take place, Delek commits to:
- Be fair and constructive, based on the principle of good faith and an open exchange of information;
 - Relate to relevant working conditions, such as wages, benefits, and the exercise of union activities; and
 - Focus on meeting common interests to improve further our competitive advantage, such as the quality and dependability of the workplace.
- 3.9 The Company and employee representatives are expected to make all reasonable efforts to develop fair and constructive negotiations, overcome the difficulties that they might encounter, reach sustainable agreements, and implement them.
- 3.10 Delek is committed to its employees, the environment and the communities in which we operate while delivering great products, services, and other initiatives that impact lives within and outside the organization.
- 3.11 Delek embeds human rights into environmental and social impact assessments as appropriate. In assessing and addressing the impacts of our operations, Delek will endeavor to consult and seek the free, prior, and informed consent (FPIC) of those who may be affected, including indigenous peoples, where this is possible and appropriate, while meeting applicable legal requirements.
- 3.12 Delek will strive to promote the socio-economic development of indigenous peoples who live in proximity to where we conduct business. This includes respecting their property ownership rights and avoiding involuntary resettlements.
- 3.13 Delek commits to ensuring that private security forces respect human rights and when applicable, our practices are guided by the goals and expectations of the Voluntary Principles on Security and Human Rights.
- 3.14 Delek commits to providing competitive wages and benefits in accordance with legal requirements.
- 3.15 Delek prohibits human trafficking, or the use of child, forced, prison, or compulsory labor. Delek shall seek to ensure that our contractual commitments require that suppliers do not engage in such practices.
- 3.16 Delek provides training and communications to employees on the Code of Business Conduct and Ethics and company policies, including this Policy.
- 3.17 In instances where there is a conflict between a legal requirement and this Policy, Delek always applies the most stringent standard, as stipulated in the UN Guiding Principles on Business and Human Rights, without violating domestic law.
- 3.18 Delek will report annually to stakeholders on the implementation of this Policy.

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4.0 RESPONSIBILITIES & AUTHORITY

- 4.1 All Delek employees are responsible for compliance with this Policy.
- 4.2 Potential or actual violations of this Policy should be reported without fear of retaliation to any of the following resources:
- Management;
 - 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.

5.0 RELATED POLICIES

- 5.1 [DK Code of Business Conduct and Ethics](#)
- 5.2 [Employee Handbook](#)