DELEK US HOLDINGS, INC.
CODE OF BUSINESS CONDUCT AND ETHICS

1. INTRODUCTION

The purpose of the Company's Code of Business Conduct and Ethics is to promote honest and ethical conduct and is a commitment to our core values and compliance with laws, regulations, Company policies and standards.

2. CORE VALUES

This Code compliments the Core Values, which should guide all your actions. Those values drive our business, requiring you to focus on the following:

- Safety and Discipline
- Curiosity Growth Mindset
- Accountability
- Respect and Integrity

3. ASK QUESTIONS AND RAISE CONCERNS

Raise Your Concerns Promptly

You are responsible for reporting any circumstances that you believe in good faith may constitute a violation of the Code, Company policies and/or applicable laws and regulations. Concerns may be raised 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.

Senior officers and directors must report to the Audit Committee of the Board of Directors any known or suspected violation of this Code, Company policies and/or applicable laws and regulations.

Remember – if you know or suspect someone is violating the Code, please speak up. This Code protects everyone's ***Safety***, supports our ***Accountability*** and ensures we have **Respect** and **Integrity** for employees, customers and shareholders.

Cooperate with Investigations, Lawsuits and Legal Proceedings

The Company is committed to reviewing all reported concerns, conducting proper, fair and thorough investigations tailored to the circumstances, and taking appropriate remedial and concluding steps as warranted, as further described in the Compliance Investigations Procedure. You are required to participate in any investigation or proceeding regarding any violations of this Code, Company policies or applicable laws and regulations, as well as any other matters of legal or regulatory concern.

Retaliation is Not Tolerated

We prohibit retaliation against any employee who reports what he or she believed in good faith to be a violation of this Code, Company policy or applicable laws and regulations and/or who provides any information or otherwise assists in any investigation or proceeding. Retaliation can take many forms; any of the following actions could constitute retaliation if taken as a punishment or deterrent to an employee who reports under this Code: suspension, demotion, or termination; denial of a raise, bonus, promotion, or other benefits; unwarranted negative performance reviews; removal from key accounts or projects; or threatening or harassing behavior. If you feel that you are being subjected to retaliation, you are urged to follow the procedures described in the "Ask Questions and Raise Concerns" section.

4. COMPLIANCE WITH LAWS

Our Core Value of **Respect** and ***Integrity*** means we act with honesty and honor without compromising the truth. You should conduct yourself and your activities on the Company's behalf in an honest and ethical manner that complies with this Code, Company policies and procedures, as well as applicable laws and regulations. You are not expected to know all the details of every law, but it is important to know when to seek advice from management, Human Resources and/or the Legal Department. Below are some legal areas to keep in mind:

- *Anti-Corruption*

  Doing business in a global marketplace, the Company complies with all applicable anti-bribery and anti-corruption laws, including the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act and other anti-bribery and anti-corruption laws. You may never pay, or offer to pay, anything of value to any government official or any other person in order to obtain or retain business or to secure an improper business advantage. This prohibition includes offering, promising, authorizing or giving anything of value through a third party doing business on our behalf. The use of Company funds or assets, directly or indirectly, for any bribe, kickback, payoff or similar purpose is strictly prohibited.

- *Insider Trading*

  Under federal securities laws, the purchase or sale of Company stock while in possession of material nonpublic information, as well as the disclosure of material nonpublic information to others who then trade in our stock are prohibited by federal securities laws, as further described in the Insider Trading Policy.

- *Competition & Fair Dealing*
  We are committed to business success through maintenance of high standards of responsibility and ethics and seek to outperform our competition fairly and honestly. You should endeavor to respect the rights of and deal fairly with our customers, suppliers, competitors and employees. You should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice. Federal and state laws prohibit unfair methods of competition and unfair or deceptive acts and practices. These laws are designed to protect both competitors and consumers. All public statements by or on behalf of the Company, including in connection with advertising, promotional materials, sales representations, warranties and guarantees, should always be truthful and have a reasonable basis in fact and should not be misleading or purposefully made easily susceptible of misinterpretation. Comparisons of our products or services with the products or services of competitors should be accurate and should be made only where facts support the statements and conclusions drawn.

- *International Trade*
  We must comply with all applicable international trade laws and regulations. These laws and regulations apply to the import and export of goods and technical data to and from the U.S. and other countries.

5. EQUAL OPPORTUNITY, DISCRIMINATION & HARASSMENT

Consistent with our Mission, Vision and Core Values, Delek believes that employees should be free of any form of discrimination so employees can fully realize greater professional and economic benefits for all employees.

We prohibit discrimination or harassment against any applicant or employee based on any legally-recognized basis, including, but not limited to: veteran status, uniformed service member status, race, color, religion, sex, pregnancy (including childbirth, lactation or related medical conditions), age (40 and over), national origin or ancestry, physical or mental disability, genetic information (including testing and characteristics) or any other consideration protected by federal, state or local law.

6. HUMAN RIGHTS

We respect the dignity, value, and worth of all human beings. We recognize our responsibility to respect human rights, and have adopted a Human Rights Policy to guide our activities in compliance with all applicable laws and regulations and consistent with the Universal Declaration of Human Rights.

7. ENVIRONMENTAL PROTECTION

Delek is committed to operating our business in an environmentally responsible manner and dedicated to continuously improving our performance. We seek to reduce the resources we consume; emissions we produce and waste we generate.

8. WORK ENVIRONMENT

We are committed to the Core Value of ***Safety*** by maintaining a healthy, safe and productive work environment. Every employee is expected to act in a professional, responsible, and courteous manner at all times. We will not tolerate comments or conduct in the workplace that creates, encourages or permits an offensive, intimidating, dangerous, or inappropriate work environment. Health and safety are important aspects of job performance. You have a responsibility to learn and follow the safety procedures applicable to your job.

9. CONFLICTS OF INTEREST

A conflict of interest exists whenever your personal interests are inconsistent with the interests of the Company. A conflict situation can arise when you take actions or have interests that may make it difficult to perform your work on behalf of the Company objectively and effectively. Conflicts of interest also arise when you or your family receive improper personal benefits as a result of your position with us.

A familial or consensual romantic relationship among employees can create an actual or apparent conflict of interest in the employment setting, especially where one relative, spouse, partner or member of such a relationship supervises another relative, spouse, partner or member. To maintain ***Integrity***, we may refuse to hire or place a relative or other associated individual in a position where the potential for favoritism or a conflict exists.

Pursuant to the Conflict of Interest Procedure, employees are required to disclose any activity or transaction that might give rise to a conflict of interest or the appearance of a conflict of interest. Activities that are subject to disclosure include, but are not limited to:

- a financial interest in a supplier, consultant/contractor, customer or competitor of the Company;
- acting as an employee, officer, director, partner, consultant, representative, agent or advisor of a supplier, consultant/contractor, customer or competitor of the Company;
- a personal relationship with a supplier, consultant/contractor, customer or competitor of the Company.

Directors and members of senior management must make similar reports to the Audit Committee and/or General Counsel to ensure the ***Integrity*** of our transactions and the protection of our best interests. Disclosures will be promptly reviewed, and protocols may be required to mitigate the actual or apparent conflict of interest.

10. COMPANY OPPORTUNITIES

You are prohibited from taking, for yourself personally, opportunities that are discovered through your use of Company property, information, or position. You may not use our property, information or position for improper personal gain, and you may not compete with us directly or indirectly. You owe a duty to us to advance our legitimate business interests when the opportunity to do so arises.

11. GIFTS AND ENTERTAINMENT

Good business relationships are important to our success and our ***Growth Oriented*** Core Value. Reasonable business entertainment and gifts may foster goodwill with our customers and vendors. Business entertainment must be moderately scaled and clearly intended to further relationships among business partners. As a general guideline, business entertainment in the form of meals and beverages is acceptable as long as it is not lavish and does not become routine.

However, excessive entertainment or gifts may pose, or create the appearance of posing, a conflict of interest. Do not accept any entertainment or gift that may impair your judgment in instances where our best interests are at stake. This prohibition applies even if the entertainment or gift is otherwise reasonable or customary.

Without limiting the generality of the foregoing, we believe that the following create the appearance of impropriety and you and your family members are therefore specifically prohibited from requesting, offering, giving, or accepting any gift or entertainment that:

- is a cash or cash equivalent gift (for example, gift cards),
- is inconsistent with customary business practices,
- is excessive in terms of frequency or value,
- can be construed as a bribe or payoff, or
- violates any laws or regulations.

Gifts, promotional items and entertainment may be extended at our expense in the normal course of business provided the items:

- are reasonable in nature, frequency and amount;
- are consistent with applicable law as well as with accepted ethical standards and business practices;
- have been authorized by your supervisor, are properly recorded, and are of sufficiently limited value so that they will not be construed as a bribe, payoff or kickback; and
- would not embarrass the Company should public disclosure be made.

Discuss any questionable gift or entertainment with the General Counsel or Director, Ethics & Compliance.

12. FINANCIAL INTEGRITY AND RESPONSIBILITY

We are committed to making full, fair, accurate, timely and understandable disclosures in compliance with all applicable laws, rules and regulations in all reports and documents that we file with, or submit to, the U.S. Securities and Exchange Commission (the "SEC") and in all other public communications. Depending on your position with us, you may be called upon to provide necessary information in furtherance of this policy. We expect you to exercise the Core Value of ***Integrity*** and take this

responsibility very seriously by providing prompt, accurate and complete answers to inquiries related to our public disclosure. If the Chief Executive Officer, Chief Financial Officer, Treasurer, Chief Accounting Officer or any persons performing similar functions (each a "Senior Financial Officer") becomes aware of material information that affects the disclosures made or to be made by the Company in its SEC filings or submissions or other public communications, the Senior Financial Officer should promptly bring such information to the attention of our personnel responsible for preparing such disclosures.

The Senior Financial Officers should oversee the establishment and management of our internal controls and disclosure controls and procedures to enable:

- our consolidated financial statements and the notes thereto to present fairly, in all material respects, our financial position, results of operations and cash flows as of and for the period(s) indicated in conformity with accounting principles generally accepted in the United States; and
- the Senior Financial Officers to bring to the attention of the Audit Committee any information of which they are aware, concerning (i) significant deficiencies in the design or operation of internal controls which could adversely affect our ability to record, process, summarize and report financial data, or (ii) any fraud, whether or not material, that involves management or other employees who have a significant role in our financial reporting, disclosures or internal controls.

13. RECORDKEEPING AND ACCOUNTING

Honest and accurate recording and reporting of information is required to make responsible business decisions. All books and records of the Company must be kept so that they fully and fairly reflect all of our receipts and expenditures. Your business expenses must be authorized and accurately documented in accordance with the Business Travel and Business Expense Policy.

We address all concerns regarding our financial statements, accounting, internal accounting controls or audit matters. If you have complaints or concerns regarding questionable accounting or auditing matters, promptly report the matter to our Chief Financial Officer and/or General Counsel. If you wish to submit these concerns or complaints anonymously, you can do so to follow the procedures described in the "Ask Questions and Raise Concerns" section. If desired, you may also submit concerns or complaints directly to our Audit Committee.

14. RECORD RETENTION

The Company is responsible for ensuring that its business records, including paper and electronic records, are created, managed and disposed of properly. An effective, efficient records management program allows the Company to meet its business needs and to comply with all legal and regulatory obligations. You are responsible for periodically reviewing the records in your possession and assuring you comply with any Records Retention Policy, as well as any pending legal holds.

15. CONFIDENTIAL INFORMATION

You must protect confidential information entrusted to you about our operations, customers and other third parties. Confidential information includes all non-public information that, if disclosed, might be useful to competitors, or harmful to the Company or its customers. Confidential information comes in many forms, including in conversation, on paper or electronically. Specific examples of confidential information include financial operating results, employee personal data, business projections and any information that is marked as confidential. Your obligations with respect to confidential information shall survive termination of your employment with us, regardless of the reason for termination.

Nothing herein shall prohibit you from reporting possible violations of law to any governmental agency or entity in accordance with applicable whistleblower protection provisions including, without limitation, the rules promulgated under Section 21F of the Securities Exchange Act of 1934 or Section 806 of the Sarbanes-Oxley Act of 2002, or require you to notify the Company (or obtain its prior approval) of any such reporting.

Cybersecurity is an important aspect of ensuring that private information is kept confidential. The Company has adopted policies and practices intended to guard Company networks, computers, programs, and data. Employees should ensure that these policies and practices are being followed at all times.

16. PROTECTION OF PERSONAL INFORMATION

Personal information includes any information that identifies a living person, such as government-issued identification numbers, email addresses, home addresses and telephone numbers, as well as personal financial and medical information. Our Commitment to the proper management and use of personal information means we may only collect, access, use or disclose it for legitimate business purposes, and must not share it with anyone, inside or outside of the Company, who does not have a legitimate business need to know it. Certain sensitive personal information, such as medical information, must not be disclosed to anyone without the consent of the individual. If you have access to the personal information of others as part of your role at the Company, you must ensure that you process it lawfully and securely.

17. PROTECTION & PROPER USE OF COMPANY ASSETS

You should protect our assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on our ability to ***Maximize Value***. All Company assets should be used for legitimate business purposes.

You are expected to use Company technology in a professional, ethical and lawful manner. You must not use Company-issued computers or systems to download, display, send or store material that is fraudulent, harassing, sexually explicit, obscene or otherwise unlawful, inappropriate or offensive. In addition, our technology resources may never be used to send unauthorized solicitations or to conduct business for another organization. You must follow security measures and internal controls for any technologies to which we have access.

Limited personal use of Company technology is permissible, as long as such use does not interfere with your ability to do your work. You should not have any expectation of privacy when using these resources. Company technology may be monitored and accessed as permitted by local law.

18. ARTIFICIAL INTELLIGENCE

We recognize the potential benefits that artificial intelligence ("AI") holds for our operations. We also acknowledge that AI is rapidly developing and there are risks that must be considered and addressed as the responsibility of all of our people, and we expect that you will familiarize yourself with our policies on AI and consult our Compliance Department with any questions you have.

19. POLITICAL CONTRIBUTIONS

Under federal and most state statutes, it is unlawful for the Company or any employee to use Company funds to make any direct or indirect political contributions to parties or candidates. Any political contributions at the state, local or county level may be authorized on behalf of the Company only after the General Counsel, or designee, has certified in writing that such political contributions comply with applicable law and they have been pre-approved by the Chief Executive Officer. Company resources may be used to support the operation of Delek's political action committee, DK PAC, and only after the approval of the Vice President of Public Affairs & ESG.

The above prohibitions relate only to the use of corporate funds, property and assets and are not intended to discourage you from making personal political contributions (including those to a political action committee) or engaging in personal political activities on your own time. However, you may not conduct political activity on Company time or use Company property or equipment for this purpose. You should make clear at all times that your funds, views and actions are your own and are not those of the Company.

20. PUBLIC COMMUNICATIONS

Accountability also means we deliver accurate and reliable information to the media, financial analysts, investors and other members of the public. All public disclosures, including forecasts, press releases, speeches and other communications, will be honest, accurate, timely and representative of the facts. Any release of material information or statement to the media about a material event, occurrence, accident or business related issue must be approved by the Disclosure Committee. Requests from media or other third parties should be forwarded to the Vice President of Public Affairs & ESG. Do not give any information or opinions as a representative of the Company.

21. AMENDMENTS AND WAIVERS

Any amendment of any provision of this Code must be approved by the Board of Directors and promptly disclosed as may be required pursuant to applicable laws and regulations. The Company's General Counsel may grant waivers under this Code for employees other than Executive Officers or Senior Financial Officers. Only the Board of Directors may approve any waiver of this Code for the Company's

Executive Officers, Senior Financial Officers or members of the Board of Directors, which must promptly disclose waiver to the Company's stockholders as required by applicable laws and regulations.

22. COMPLIANCE & GOVERNANCE

- This Code of Business Conduct and Ethics applies to Delek US Holdings, Inc., its subsidiaries, its affiliates and all employees of Delek or its subsidiaries and affiliates, as well as employees, officers and directors of the Company.

- 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; 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, Legal, Compliance, Human Resources, or Internal Audit Services, shall be reviewed and assigned in accordance with the Compliance Investigation Procedure.

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

23. RELATED POLICIES

Conflicts of Interest
Ai Policy
Insider Trading
Employee Handbook