



PBF Energy Inc. and Subsidiaries
Supplier Code of Conduct
Effective: July 12, 2023

PBF Energy Inc. and its subsidiaries (collectively, “PBF”) are committed to working with vendors who operate in an ethical and responsible manner, observe labor, human rights, and anti-corruption principles, and comply with applicable laws and adhere to recognized environmental, social and corporate governance standards. The PBF Energy Inc. Supplier Code of Conduct (this “Code”) defines our minimum requirements with respect to the environmental, social and governance performance of the third parties, contractors, vendors, sellers, or other suppliers who provide goods and services in support of our business (“Suppliers”). Suppliers are responsible to ensure their sub-contractors, business partners, and suppliers (the “Supply Chain”) act in a manner consistent with this Code. This Code comprises an important component of PBF’s Supplier selection and evaluation.

The Code

PBF requires Suppliers to operate in accordance with the principles set forth in this Code and in full compliance with all applicable laws and regulations. In instances where this Code requires Suppliers to operate to a higher standard than what is required by law, PBF requires Suppliers and the Supply Chain to comply with this Code. Suppliers shall immediately notify PBF of any conflict between this Code and local laws and/or regulations. If compliance with this Code might violate or conflict with laws and/or regulations, PBF requires Suppliers to promptly notify PBF and explain how they intend to operate in a responsible manner.

If Suppliers identify any non-compliance with this Code, they are required to take corrective action in a timely manner. Failure to take timely corrective action of any identified non-compliance with this Code may result in specific measures imposed by PBF, including but not limited to the withdrawal of business.

Suppliers shall not provide, use or rely on the use of falsified documents or records for legal compliance or for meeting the requirements of this Code.

Supplier shall promptly report to PBF any action, whether by a Supplier or PBF, or their respective employees or subcontractors, which is, or may be inconsistent with this Code or the PBF Code of Conduct to appropriate PBF management.

This Code is comprised of five sections: Section A – Ethics; Section B - Labor and Human Rights; Section C- Health and Safety; Section D - Environmental and Section E – Management System.

PBF requires Suppliers to uphold the following standards:

A. ETHICS

Suppliers shall commit to the highest standards of ethics in conducting all aspects of their business.

1) Business Integrity

Suppliers shall have a zero tolerance policy that prohibits any and all forms of bribery, corruption, extortion, embezzlement (covering promising, offering, giving or accepting any bribes), and facilitation payments. All of Suppliers' business dealings shall be performed in a transparent manner and be accurately reflected in Suppliers' business books and records.

Suppliers shall implement monitoring, recordkeeping and enforcement procedures to ensure compliance with anti-corruption laws.

2) No Improper Advantage

Suppliers shall not promise, offer, authorize, give or accept bribes or other means of obtaining undue or an improper advantage. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.

3) Fair Dealing

Supplier acknowledges that PBF employees may accept only common courtesies normally associated with ethical business practices and which would not influence or appear to influence PBF's sound business judgment. Other than such courtesies, Supplier shall not provide, and acknowledges that PBF employees may not accept or solicit, any gifts, payments, finder's or agent's fees, services, kickbacks, rebates, valuable privileges or other favors from any person, governmental agent or employee or business organization that sells or buys, or seeks to sell or buy, products or services to or from PBF.

Supplier may not promise, offer, authorize, or give, and PBF employees may not accept non-monetary unsolicited gifts unless:

- they are items of nominal intrinsic value;
- they are consistent with customary and reasonable business practices;
- they are not in contravention of applicable law or ethical standards; and
- public disclosure of the facts would not embarrass PBF or its employees.

PBF employees are prohibited from soliciting from Supplier or customers any form of entertainment (i.e., dinner parties, theater parties, sports events, etc.), and Supplier shall not provide such entertainment in response to solicitations by PBF employees. Occasionally, PBF employees may accept or give, and Supplier may provide, unsolicited forms of entertainment, so long as it arises out of the ordinary course of business; involves reasonable, not lavish, expenditures; does not obligate the recipient; and takes place in appropriate settings.

4) Disclosure of Information

Suppliers shall disclose information regarding labor, health and safety, environmental practices, business activities, structure, financial situation and performance in accordance with applicable regulations and prevailing industry practices. Suppliers shall not falsify records or misrepresent conditions or practices in the Supply Chain. PBF reserves the right to request Suppliers' anti-corruption policies and procedures as well as these policies and procedures of the Supply Chain.

5) Protection of Identity and Non-retaliation

Suppliers shall provide a mechanism by which its employees can anonymously and confidentially report workplace grievances and / or alleged improper conduct of an employee, company officer, public official or official body without fear of retaliation. Suppliers shall communicate to their personnel the process by which they are able to raise any such concerns.

6) Responsible Sourcing of Minerals

Supplier shall attest that the items to be procured by PBF are manufactured without the use of any materials identified as "Conflict Minerals", or other such designated mineral/material within the scope of the US Dodd-Frank Wall Street reform and Consumer Protection Act 2010, as amended.

7) Privacy

Suppliers shall protect the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees. Suppliers shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

B. LABOR AND HUMAN RIGHTS

Suppliers shall commit to upholding the human rights of workers and treating them with dignity and respect. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker. The recognized standards, as set out at the end of this Code, were used as references in preparing the Code and may be a useful source of additional information, concerning this section of the Code.

1) Freely Chosen Employment

All work must be conducted on a voluntary basis and not under threat of any penalty or sanctions. Forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery or trafficking of persons shall not be used and, in connection with performing work for PBF, Suppliers will not partner with any business that uses any of these forms of labor. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services.

All work must be voluntary and workers shall be free to leave work at any time or terminate their employment.

Supplier and its agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law. Workers shall not be required to pay deposits, or employer or agent recruitment fees, or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the workers.

Suppliers and the Supply Chain shall comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force; and not engage in any activity, practice or conduct that would constitute an offense under 48 CFR 52.222-50 Combating Trafficking in Persons of the US Code of Federal Regulations, as amended, or other laws or regulations in effect.

Suppliers shall include in their contracts with the Supply Chain anti-slavery and human trafficking provisions that are at least as onerous as those set out in this Code. Suppliers shall implement monitoring, recordkeeping and enforcement procedures to ensure compliance with anti-slavery

and human trafficking laws.

Suppliers shall notify PBF as soon as they become aware of any actual or suspected slavery or human trafficking in the Supply Chain connected to PBF. Suppliers shall maintain a complete set of records to trace the Supply Chain of all goods and services provided to PBF which shall be available for PBF to view on request. These records shall include all information needed by PBF to conduct risk-based mapping in connection with its efforts to prevent the use of forced labor in its Supply Chain and PBF will continue to monitor the United States Department of Labor's List of Goods Produced by Child Labor or Forced Labor, as well as the Countries that are the focus of this list, to assess the regions and suppliers that PBF believes are the highest risk for forced labor in its industry. PBF expects all Suppliers in its Supply Chain to implement these efforts as well.

2) Child Labor Avoidance

Suppliers are not allowed to use child labor in any aspect of its Supply Chain. The use of legitimate workplace apprenticeship programs, which comply with all laws and regulations, is supported.

3) Humane Treatment

PBF does not tolerate the harsh and inhumane treatment or threat of such treatment including but not limited to, any sexual harassment, sexual abuse, corporal punishment or physical coercion of workers. Suppliers shall establish clearly defined disciplinary policies and procedures to prevent such treatment and communicate those policies and procedures to workers.

4) Non-Discrimination

Suppliers shall be committed to a workforce free of harassment and unlawful discrimination. Suppliers shall not engage in discrimination based on any category protected by applicable law in hiring and employment practices such as wages, promotions, rewards, and access to training. Suppliers shall apply the principle of equal pay for men and women workers for work of equal value.

5) Freedom of Association

Suppliers shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities.

C. HEALTH AND SAFETY

Suppliers shall commit to providing and maintaining a safe work environment that integrates sound health and safety management practices into its business. Suppliers shall provide workers with appropriate health and safety training in their primary language and shall regularly monitor risks and hazards that may impact health and safety of workers, including but not limited to risks associated with structural integrity of facilities, fire, electrocution and hazards associated with exposure to noise, dust and chemicals.

1) Occupational Safety

Suppliers shall control workers' exposure to potential safety hazards (e.g., electrical and other energy sources, fire, vehicles and fall hazards) through proper design, engineering and administrative controls, preventative maintenance and safe work practices and procedures (including lockout/tagout), and ongoing safety training. Where hazards cannot be adequately controlled by these means, Suppliers shall

provide workers with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards. Workers shall not be disciplined for raising safety concerns and shall be encouraged to raise safety concerns.

2) Emergency Preparedness

Suppliers shall identify and assess potential emergency situations and events and minimize their impact by implementing emergency plans and response procedures including: emergency reporting, employee notification and evacuation procedures, worker training and drills,

appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment and property.

3) Occupational Injury and Illness

Suppliers shall put procedures and systems in place to prevent, manage, track and report occupational injury and illness including provisions to: encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of workers to work.

4) Health and Safety Communication

Suppliers shall provide workers with appropriate workplace health and safety training in their primary language. Health and safety related information shall be clearly posted in the facility.

Suppliers shall implement monitoring, recordkeeping and enforcement procedures to ensure compliance with health and safety laws.

D. ENVIRONMENTAL

Suppliers shall obtain and keep current all required environmental permits, approvals and registrations and shall comply with all operational and reporting requirements.

Suppliers shall identify and manage any chemicals and other materials that if released to the environment would pose a hazard and ensure the safe handling, movement, storage, use, recycling or reuse and disposal of such chemicals and other materials.

Suppliers shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle waste (both hazardous and non-hazardous). Suppliers shall characterize, monitor, control and treat wastewater and waste (both hazardous and non-hazardous) generated from operations, industrial processes and sanitation facilities as required prior to discharge or disposal. In addition, Suppliers shall implement measures to reduce the generation of wastewater and conduct routine monitoring of the performance of its wastewater treatment systems.

Suppliers shall adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances, including labeling for recycling and disposal.

Suppliers shall implement monitoring, recordkeeping and enforcement procedures to ensure compliance with environmental laws.

E. MANAGEMENT SYSTEM

Suppliers shall adopt or establish a management system whose scope is related to the content of this Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to Suppliers' operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement. Suppliers shall have a process to communicate and monitor the requirements of this Code to the Supply Chain and to ensure compliance with this Code. Supplier shall provide PBF with the following certification on an annual basis:

I, an authorized representative of _____ (name of Supplier), hereby acknowledge and agree to abide by PBF's Supplier Code of Conduct and ensure that the employees, officers, directors, agents, suppliers, representatives of _____ (name of Supplier) are aware of and abide by this Code for the provision of goods and services to PBF and during the performance of all agreements entered into with PBF.

Signature: _____ Title: _____ Date: _____