



Business Partner Code of Conduct

Business Integrity & Our Shared Values

At World Kinect, we strongly believe that the way we achieve results is just as important as the results themselves. World Kinect is committed to complying with both the letter and the spirit of all applicable laws and regulations and to acting ethically at all times. Whenever working with or on behalf of World Kinect Corporation or one of our subsidiaries and affiliates (collectively, “World Kinect”), we expect our suppliers, contractors and agents, as well as any employees, subcontractors, and agents working on their behalf (collectively, “Business Partners”) to share this commitment. We will take appropriate measures where we believe our Business Partners have not met our expectations, including terminating the business relationship.

Anti-Corruption Laws

Business Partners must comply with all anti-corruption laws and regulations related to their work with World Kinect, including, but not limited to, the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act. Business Partners shall not make, offer or authorize, or accept either directly or indirectly, any unlawful or unethical payment, gift, promise or other benefit for the purposes of receiving an improper advantage. All business dealings must be performed in a transparent fashion that is accurately recorded.

Trade Laws

Our Business Partners must comply with all economic sanctions, embargoes and other trade restrictions (collectively, “trade laws”) related to their work with World Kinect. These trade laws include, but are not limited to, trade restrictions administered or enforced by the U.S. Department of the Treasury’s Office of Foreign Assets Control (“OFAC,” including the OFAC Specially Designated Nationals List (“SDN List”)), the U.S. Department of State, the United Nations Security Council, the European Union, and HM Treasury.

Antitrust & Competition Laws

It is World Kinect policy to compete vigorously in the marketplace in full respect of all applicable antitrust and competition laws, trade practice laws, rules and regulations dealing with monopolies, and restraints of trade and unfair competition (collectively, “antitrust and competition laws”). Business Partners must comply with all applicable antitrust and competition laws and never take, or attempt to take, unfair advantage of any third party through manipulation, concealment, abuse of restricted information, unfair dealing, or any other act that may unfairly impact competition, such as price fixing or market allocations.

Prevention of Fraud and Tax Evasion

We strictly prohibit any form of fraud or tax evasion. We expect our Business Partners to comply with all applicable laws, regulations, codes, and sanctions relating to the prevention of fraud or tax evasion. Under no circumstances shall any Business Partner become involved with, or take steps with a view to, assisting another person to commit fraud or fraudulently evade tax.

Conflicts of Interest

Business Partners shall avoid all actual or perceived conflicts of interests, and all business decisions must be impartial and based on sound business reasoning. Business Partners shall not offer, provide or solicit anything that might compromise or appear to compromise a World Kinect employee or customer’s judgment or independence. Business Partners shall not deal with any World Kinect employee whose spouse, domestic partner, or other family member or relative is employed by or holds a significant financial interest in the Business Partner (other than publicly traded securities). Business Partners must disclose any such potential or actual conflict of interest to their World Kinect business contact as soon as the conflict is identified.

Data Privacy & Security

World Kinect is committed to protecting the reasonable privacy expectations of everyone our Business Partners work with, including other Business Partners, customers, consumers, and employees. Business Partners must comply with all applicable data privacy and information security laws, regulatory requirements and industry best practices whenever personal information is collected, stored, processed, transmitted or shared. Business Partners must also safeguard and maintain the confidentiality of all World Kinect proprietary information, not disclose such information to third parties without World Kinect written consent, and prevent the misuse of such information, such as through trading shares in World Kinect, its customers, or its other Business Partners based on material non-public information.

Health, Safety & Environment

World Kinect is committed to maintaining the health and safety of the people and environment where we operate. In addition to complying with both the letter and spirit of applicable health, safety, and environmental regulations, Business Partners are expected to minimize adverse effects from their activities on the community, environment, and natural resources while safeguarding the health and safety of the public.

Human Rights

We respect the human rights and dignity of people in our operations, supply chain and the communities where we work. We support the core principles espoused in the United Nations Universal Declaration of Human Rights and comply with country specific human rights-related laws, such as the UK Modern Slavery Act 2015. Business Partners shall obey all applicable Human Rights laws and conduct their activities in a manner that complies with the UK Modern Slavery Act 2015 and the United Nations Universal Declaration of Human Rights. In particular, Business Partners shall take all possible steps to prevent any form of forced, bonded, compulsory labor or modern forms of slavery and comply with all applicable local laws and mandatory industry standards regarding working hours, including overtime, rest breaks and paid vacation.

Compliance Audits

Business Partners shall provide accurate information to World Kinect regarding their business activities, corporate structure, financial situation and performance in accordance with applicable contractual provisions, regulations, and prevailing industry practices. As necessary and upon reasonable notice, World Kinect reserves the right to conduct audits to verify compliance with this Business Partner Code of Conduct. Business Partners shall keep original and accurate records to prove compliance, provide World Kinect the necessary access and information as required, and act in good faith to improve and/or correct any deficiencies discovered during such an audit.

No Third-Party Rights

This Business Partner Code of Conduct does not confer any rights to any third parties. No employees of any Business Partner will have any rights against World Kinect by virtue of this Business Partner Code of Conduct, nor will such employees have any rights to cause World Kinect to enforce any provisions of this Business Partner Code of Conduct.

Compliance Hotline

World Kinect requires that unlawful or unethical conduct by an employee of World Kinect, a Business Partner, or any third party operating on its behalf be reported immediately. Reports can be made to a member of World Kinect management, the World Kinect Legal and Compliance Department, or confidentially through the World Kinect Compliance Hotline. You can make a report online and/or find a local toll-free number at compliance.world-kinect.com

Business Partner Compliance Confirmation

As a responsible, regulated and publicly traded U.S. company, World Kinect Corporation, along with our subsidiaries and affiliates (collectively, “World Kinect”), pride ourselves on applying high standards of due diligence to our suppliers, contractors, service providers and other partners (hereinafter, “Business Partners”). We do so to maintain our own high corporate ethics and compliance standards, to adhere to applicable domestic and international regulations, and to protect our own reputation and the reputations of our customers and Business Partners alike.

Notwithstanding any other terms and conditions under which World Kinect and a Business Partner may engage, whenever working with or on behalf of World Kinect we expect all our Business Partners – as well as all Business Partner employees, subcontractors, and agents working on their behalf – to uphold our commitment to lawful and ethical conduct. We have summarized these requirements in our Business Partner Code of Conduct. Please note that World Kinect will take appropriate measures where our Business Partners do not meet these compliance expectations, up to and including termination of the business relationship.

Once you have reviewed the World Kinect Business Partner Code of Conduct, please sign and return the following confirmation promptly to your primary World Kinect business contact.

With kind regards,

World Kinect World Ethics & Compliance Team

world-kinect.com

I hereby confirm that my organization has reviewed and will comply fully with the World Kinect Business Partner Code of Conduct.

Business Partner Name: _____

Representative Name: _____

Representative Title: _____

Representative Email: _____

Representative Signature: _____

Date: _____