

SUPPLIER CODE OF CONDUCT

DO RIGHT ALWAYS

At Murphy, one of our values is “Do Right Always” and it forms the basis for the way we do business around the world. We have the same expectation for anyone that works with us; potential contractors, suppliers and partners including their staff, agents and sub-contractors (“Suppliers”). We will not sacrifice our values for short-term gain. Compliance with any applicable law as well as ethical behavior are conditions to work with us. No improper or illegal behavior can be justified by claiming that someone with higher authority ordered it. No one, regardless of position, is authorized to commit an illegal act or violate a Company policy on Murphy’s behalf.

We value our Supplier relationships and expect high professional and ethical standards. Together, we will maintain Murphy’s worldwide reputation for integrity and our mutual success.

HEALTH, SAFETY AND ENVIRONMENT

We are committed to protecting both the health and safety of all personnel on Murphy sites as well as to environmental stewardship of the surrounding community at large. Murphy expects employees and Suppliers alike to abide by our health, safety and environmental policies and procedures as outlined in our [Worldwide HSE Policy](#), [HSE Management System](#), [Contractor Management Standard](#) and Master Service Agreements. Where required, we expect our Suppliers to subscribe to ISNetwork as a part of our onboarding process.

ANTI-CORRUPTION & BRIBERY

Murphy requires our Suppliers to comply with all anti-corruption laws and regulations, including the U.S. Foreign Corrupt Practices Act. Murphy will not tolerate fraud or bribery of any nature, whether for personal benefit or in the misguided view that it is for the benefit of the Company or that of the Supplier. Suppliers must not make, offer, or authorize (directly or indirectly) any unlawful payment, gift, promise or benefit to anyone on behalf of Murphy.

ANTITRUST, COMPETITION LAWS AND CONFLICTS OF INTEREST

Murphy is committed to operate in full compliance with applicable antitrust, trade practice and competition laws. Suppliers are expected to avoid actual or perceived conflicts of interests, and business decisions should be impartial and based on sound business reasoning. Any potential conflict of interest related to Murphy business should be declared to a Murphy representative as soon as it is identified. Suppliers shall not offer, provide or solicit anything that might compromise or appear to compromise Murphy’s judgment or independence.

CONFIDENTIAL DATA SECURITY AND PRIVACY

Suppliers must comply with applicable data privacy and information security laws as well as best practices whenever sensitive information is collected, stored, processed, transmitted or shared. Suppliers must safeguard and maintain the confidentiality of all Murphy proprietary information and shall misuse such information or disclose such information to third parties without Murphy written consent. Suppliers are expected to maintain and administer trading policies that prohibit anyone working for them from trading shares in Murphy while they have access to material non-public information. This obligation continues even after the working relationship with Murphy ceases.

PROPER ASSET USE

Taking care of Murphy resources is the responsibility of all personnel on site. We expect our Suppliers to protect and ensure proper legitimate use of all Murphy assets against theft, loss and misuse. If a Supplier becomes aware of any misuse, theft or loss of Murphy assets, we expect them to promptly raise the issue with Murphy personnel.

HUMAN RIGHTS & LABOR LAW

Suppliers must protect, respect, and support human rights measures and comply with all relevant human rights laws and regulations. Murphy's [Human Rights Policy](#) requires Suppliers to conduct their activities in a manner that complies the United Nations Universal Declaration of Human Rights, which include, but is not limited to:

- refusing to use child labor or forced labor of any kind;
- refusing to tolerate discrimination, harassment, abuse, or retaliation in their workplace;
- complying with all applicable laws and regulations on freedom of association and collective bargaining;
- providing wages, benefits, and working hours that meet or exceed the applicable legal standards, local laws and regulations.

TRADE LAWS

Our Suppliers must comply with all economic sanctions, embargoes and other trade restrictions related to their work with Murphy.

COMPLIANCE AUDITS

Suppliers of Murphy may from time to time be subject to audits and assessments for compliance with various obligations. Suppliers shall provide accurate information to Murphy regarding their business activities, corporate structure, financial situation and performance in accordance with applicable contractual provisions, regulations, and prevailing industry practices. Suppliers are expected to act in good faith to improve and/or correct any deficiencies discovered during such an audit.

PUBLIC DISCLOSURE

Suppliers are not allowed to speak on behalf of Murphy in any manner unless approved in advance and in writing by authorized Murphy personnel.

NO THIRD-PARTY RIGHTS

This Supplier Code of Conduct does not confer any rights to any third parties. No employees or contractors of any Supplier will have any rights against Murphy by virtue of this Supplier Code of Conduct, nor will they have any rights to cause Murphy to enforce any provisions of this Supplier Code of Conduct.

REPORTING OF VIOLATIONS

Murphy requires that actual or potentially inappropriate or illegal conduct by a Murphy employee, a Supplier, or any third party operating on its behalf shall be reported immediately. Reports should be made to your Murphy business contact.

ACKNOWLEDGEMENT OF THIS CODE

Notwithstanding any other agreements or terms and conditions under which Murphy and a Supplier may engage, we expect all our Suppliers and supporting personnel to uphold the ethical standards set forth in this Code. Our expectation is this Supplier Code of Conduct be reviewed and acknowledged on an annual basis via the ISNetworld portal or signed electronic copy as needed.