

Calumet's Cardinal Rules:

Protecting the safety and health of employees, contractors and visitors is a shared responsibility of everyone that works at Calumet Specialty or one of its subsidiaries. We hold Safety, both Occupational and Process Safety, as our Top Priority, followed by Environmental Protection, followed by Production. If it isn't Safe, We Don't Do It.

The following Cardinal Rules are intended to communicate clear expectations in areas that are critical to occupational safety, process safety, and environmental protection. 100% compliance with these Cardinal Rules is a basic expectation of all Calumet employees, contractors and visitors. Deliberate violations of these Cardinal Rules cannot and will not be tolerated.

Failure to follow any of these Cardinal Rules will result in an investigation into the circumstances, followed by appropriate actions, which may include disciplinary action.

1. Personal protective equipment, including H2S monitors, must be worn when required by a Calumet procedure or Safe Work Permit.
2. Injuries, incidents, releases, fires, vehicular and property damage must be promptly reported.
3. Operating and maintenance procedures and Safe Work Permit requirements must be followed, unless there is a supervisory notification and concurrence, with mitigating measures. Propose changes to improve procedures, rather than taking shortcuts.
4. Safe Work Permits, issued in accordance with site-specific procedures, are always required for the following types of activities:
 - a. Isolation of energy sources ('Lockout-Tagout-Try')
 - b. Entering a Confined Space
 - c. Hot work such as cutting and welding
 - d. Line breaking
 - e. Electrical system maintenance and repair
 - f. Work at heights requiring fall protection systems

Compliance with the specific requirements of the individual Safe Work Permit is required. Safe Work Permits may be required for additional activities based on site-specific programs.
5. Removing, disabling, tampering, silencing, or bypassing alarms, safety devices or guards must never be done unless allowed by written procedures or with written managerial approval. Operators are empowered and expected to shut units down when needed to avoid exceedance of Safe Operating Limits.
6. Safety systems must be functional and enabled prior to startup and equipment in working order prior to use. Any other condition requires management review, approval and mitigating measures.
7. Weapons, substance abuse, smoking outside of designated areas, and workplace violence are never acceptable.