

BUSINESS PARTNER CODE OF CONDUCT

Business Integrity & Our Shared Values

At World Fuel Services (“WFS”), we believe strongly that the way we achieve results is just as important as the results themselves. WFS 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 WFS, 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 and adhere to these standards and values. 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 anti-corruption laws and regulations related to their work with WFS, including, but not limited to, the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act. Business Partners shall never make, offer or authorize, either directly or indirectly, any unlawful payment, gift, promise or other advantage. All business dealings must be performed transparently and reflected accurately in a Business Partner’s books and records.

Trade Laws

Our Business Partners must comply with economic sanctions, embargoes and other trade restrictions (collectively, “trade laws”) related to their work with WFS. 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 Her Majesty’s Treasury.

Antitrust & Competition Laws

It is WFS’ policy to compete vigorously in the marketplace in full respect of all applicable antitrust and competition laws; trade practice laws; rules and regulations dealing, for example, with monopolies, unfair competition, restraints of trade, and competition; and ensuring appropriate relationships with competitors and customers (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.

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 WFS employee or customer’s judgment or independence. Business Partners shall not deal with any WFS 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 WFS business contact as soon as the conflict is identified.

Data Privacy & Security

WFS 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 WFS proprietary information, not disclose such information to third parties without WFS written consent, and prevent the misuse of such information, such as through trading shares in WFS, its customers, or its other Business Partners based on material non-public information.

Health, Safety & Environment

WFS 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

Business Partners shall conduct their activities in a manner that complies with the UK Modern Slavery Act 2015 and the United Nations Universal Declaration of Human Rights, which include, but are not limited to: refusing to use forced or child labor; refusing to tolerate discrimination, harassment, abuse, or retaliation in their work place; and providing wages, benefits, and working hours that meet or exceed the applicable legal standards and regulations.

Compliance Audits

Business Partners shall provide accurate information to WFS 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, WFS 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 WFS 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 WFS by virtue of this Business Partner Code of Conduct, nor will such employees have any rights to cause WFS to enforce any provisions of this Business Partner Code of Conduct.

Anonymous Compliance Hotline

WFS requires that actual or potentially inappropriate or illegal conduct by an employee of WFS, a Business Partner, or any third party operating on its behalf be reported immediately. Reports can be made to a member of WFS management, the WFS Legal Department, or through the WFS anonymous compliance hotline which is available at +1 (877) 787-8742 (U.S. Toll Free), +1 (770) 776-5690 (International Collect), or online at <http://www.reportlineweb.com/wfs>.