

Renewable Energy Group, Inc.  
**VENDOR CODE OF CONDUCT**

**Introduction**

It is the general policy of Renewable Energy Group, Inc. and our subsidiaries ("REG" or the "Company") to conduct our business activities and transactions with the highest level of integrity and ethical standards, and in keeping with our core values and in accordance with all applicable laws. To achieve this standard, we work with suppliers, customers, third parties, contractors, intermediaries, and their agents (collectively, "Vendors") who share the same commitment to excellence. We expect all of our Vendors to read, understand and follow the policies contained in this Vendor Code of Conduct (the "Code") and support REG's commitment to ethical conduct in the industry.

This Code covers a wide range of business practices and procedures. It does not cover every issue that may arise, but it sets out basic principles to guide Vendors regarding REG's expectations in order to maintain a business relationship. All vendors must conduct themselves accordingly and seek to avoid even the appearance of improper behavior. Reports of non-compliance will be investigated and could lead to termination of business relationships.

**Standards of Vendor Engagement**

**Compliance with Laws, Rules and Regulations**

REG policy requires that all Vendors comply with all applicable laws, rules and regulations in every jurisdiction the Vendor transacts business with, or on behalf of, REG. This includes all global trade laws such as export and licensing regulations. All products must be marked correctly and accompanied with accurate documentation. This Code cannot cover all policies and applicable laws, so if you have questions regarding this Code or Vendor expectations, please address these questions with your REG contact or the REG compliance team at [compliance@regi.com](mailto:compliance@regi.com).

**Gifts, Hospitality and Expenses**

REG is founded on values that encourage goodwill among our partners, but the offering of gifts can make it difficult to be objective about business relationships. Vendors must avoid offering, giving, soliciting or accepting gifts or any form of benefit when they could influence or are perceived to influence a business transaction in REG's supply chain. It is REG's policy that employees must inform their supervisor of any premiums, rebates, gifts, etc., received from a third party over a value of one hundred dollars. All such instances will be captured in an electronic gift registry.

**Conflicts of Interest**

A "conflict of interest" can arise when a person's loyalties or actions are divided between the interests of REG and those of the Vendor. Breach of confidentiality obligations can also give rise to a conflict of interest. Moreover, the appearance of a conflict of interest alone can adversely affect the relationship between the Vendor and REG. Vendors are expected to use good judgment, to adhere to high ethical standards and to avoid situations that create an actual or perceived conflict of interest. It is almost always a conflict of interest for Vendors to simultaneously employ an REG employee. Actual or potential conflicts of interest should be disclosed to the company in writing at [FCPA@regi.com](mailto:FCPA@regi.com).

**Facilitation Payments**

Facilitation payments are nominal payments made to secure or expedite the performance of routine actions. In the event it becomes necessary for a Vendor to make a facilitation payment on behalf of, or for the benefit of the Company, the Vendor must seek approval from the Company's FCPA Compliance Officer by emailing [FCPA@regi.com](mailto:FCPA@regi.com).

## **Fair Dealing**

Although the prosperity of REG depends on our ability to outperform our competitors, we are committed to achieving success by fair and ethical means. We seek to maintain a reputation for honesty and fair dealing among our competitors and the public alike. In light of this aim, dishonest, unethical or illegal business practices are prohibited. An exhaustive list of unethical practices cannot be provided. Instead, we rely on the judgment of each individual to avoid such practices. Furthermore, each Vendor should endeavor to deal fairly with their suppliers, REG, and REG employees, and should not take unfair advantage of anyone through manipulation, concealment, misuse of privileged information, misrepresentation of material facts, or any other unfair business practice.

## **Anti-Bribery and Anti-Corruption**

Bribery involving commercial parties or any governmental official is prohibited under the Company's Anti-Corruption Policy. It is imperative that REG and the Vendor alike work in an honest manner and avoid all forms of corruption, including extortion and bribery by following all anti-bribery, anti-corruption, and anti-money laundering laws in their respective jurisdictions (e.g. US Foreign Corrupt Practices Act).

## **Health, Safety and Environmental Practices**

Vendors have a duty to maintain a safe working environment for all their employees who provide products or services to REG. In the event a Vendor is onsite at REG, the Vendor is expected to follow all REG safety and health rules, policies and procedures.

Enabling a cleaner environment is REG's business. We are committed to continuously improving our environmental impact. REG strives to exceed industry standards through the optimization of available resources and will continue to be dedicated to research and development that supports a sustainable community. We expect Vendors to follow this commitment by recognizing their environmental responsibilities and communicate openly on relevant health, safety and environmental issues.

## **Human Rights and Social Duty**

REG is committed to adhering to all laws and regulations in the jurisdictions in which we conduct business, including anti-slavery, human trafficking, and labor laws, such as age, hour and wage requirements. It is REG policy to practice diligence in our supply chains to ensure our business is free of such abuses. We expect our Vendors to operate with the same standards and will not work with suppliers that tolerate any violations of this principle.

## **Reporting Violations of this Code**

Anyone may report evidence of wrongdoing, complaints, or concerns through the below methods. When making a report, you may choose to remain anonymous. Any person who, in good faith, reports suspected legal, ethical or Code violations will not suffer any adverse consequence for doing so. All reports of wrongdoing, complaints, or concerns will be investigated and appropriate action will be taken.

- Email [FCPA@regi.com](mailto:FCPA@regi.com)
- Call +1 (515) 239-8591
- Write to: FCPA Officer, Renewable Energy Group, 416 S. Bell Ave., Ames, IA 50010

## **Questions or Concerns about a Transaction**

We must all work to ensure prompt and consistent action against violations of this Code. However, in some situations, it is difficult to know right from wrong. Since we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem.

If you have any questions or uncertainties regarding this Code or are unsure as to whether a transaction is consistent with this Code, please contact your REG point of contact or REG's compliance department.

*This Code is made available to all REG vendors. REG will review this code annually and make any necessary revisions available on the Company website. Last revised in January 2020.*