Code of Business Conduct and Ethics

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What is the Code of Business Conduct and Ethics (the "Code")?

The Code outlines principles and standards that all members of the Board of Directors, officers, and employees (collectively referred to as "Team Members") of Murphy USA Inc. and its subsidiaries must follow. The Code summarizes the standards that guide our actions and is designed to help us approach business-related decisions and problems in an ethical manner. The Company encourages its Team Members to regularly consult the Code and use it as a guide for decision making.

Why do we have a Code?

The Code is here to help Team Members conduct their duties in an ethical manner that is consistent with our Principles of Integrity, Respect, Citizenship, and Spirit.

Integrity

A key element in the ongoing success and continued strength of the Company is the high standard of professional integrity demonstrated daily by our Team Members. Integrity is the foundation of everything we do. Integrity is being persistently ethical and honest to foster trust. Integrity requires us to understand the difference between right and wrong and practice that in all we do. But here is the challenge: "gray areas" can make it difficult to judge what is right in a given situation. This Code is designed to help guide our actions in situations that may require careful judgment.

Respect

Respect is fundamental in our daily dealings with other Team Members and in providing the highest standard of customer service. This Code outlines those fundamental policies that foster and develop relationships premised on respect and ethical business practices.

Citizenship

The Code guides Team Members in exhibiting Citizenship. We encourage all Team Members to act as good corporate citizens. The Company must comply with extensive laws and regulations in all jurisdictions where it conducts business. It is imperative that each Team Member know, understand, and then comply with the applicable laws affecting our operations.

Spirit

Abiding by the Code furthers the Spirit of the Company and promotes an environment that allows Team Members to exceed customer expectations and strive to be the best. Team Members work closely with each other to drive our success through reliable and consistent execution. The Code is a basic foundation for Team Members to rely on to exceed customer expectations.

The Code not only promotes Team Member fulfillment of our Principles but also promotes our efforts to conduct business in a socially responsible manner, consistent with our **Corporate Responsibility Pillars**.

Affordable
The Code outlines fair dealing and fair competition business practices that are essential to providing customers with everyday low prices in a transparent manner for the fuels, merchandise, and food and beverage products they need.

Responsible
The Code establishes a foundation to ensure compliance with our legal obligations. This commitment builds responsible partnerships and trust with customers, supply partners, and regulators.

Engaged
The Code incorporates policies that create a safe and healthy place to work and a culture that values diverse backgrounds, experiences, and viewpoints. These policies support our belief that our people are our greatest asset.

Committed
The Code establishes a framework for ethical decision making by our Team Members and reinforces our commitment to engage with our local communities in a positive manner.

Aligned
Adherence to the ethical and corporate governance standards that are set forth in the Code furthers our alignment and credibility with investors.

Who does the Code apply to?

This Code applies to all of the Company, which includes:

- Murphy USA Inc. and its subsidiary companies, including QuickChek Corporation (the "Company", "We", or "Us");
- All Company directors, officers, full-time employees, and part-time employees ("Team Member(s)")
- Company contractors, consultants, and temporary workers, as applicable.

How do we use the Code?

This Code, adopted by our Board of Directors, serves as a written guide for Team Members to use regarding their legal and ethical obligations on behalf of the Company. These guidelines represent the minimum requirements that are acceptable to the Company and support the Company's related policies and procedures. The Audit Committee of the Board of Directors reviews the content of the Code at least annually, and any complaints or investigations that result in significant financial impacts are escalated to the Audit Committee accordingly. Any proposed changes or amendments to the Code are reviewed and approved by the Audit Committee and then submitted to the Board of Directors for approval.

The Company encourages its Team Members to be familiar with the Code and consult the supporting policies and procedures contained in our handbooks and other policy repositories. Below are the locations where the Code and its supporting policies and procedures can be located:

MURPHY USA

Field: Murphy Connect > My Work > Knowledge Center
Home Office: MUSA Home and Document Repository
Ethics Point Website: www.murphyusa.ethicspoint.com

QuickChek

Field: QC Express / Employment
Support Center: QC Express / Employment
Ethics Point Website: www.murphyusa.ethicspoint.com

No Code can anticipate and address every situation that may arise. When faced with a challenging situation, the Company encourages Team Members to work through the following evaluation:

Identify
Evaluate the facts of the situation.
Have a clear understanding of the required decision.

Consider
Does it comply with the Code?
Does it comply with the law?
Is it consistent with the Company's Principles?

Reflect
How would the decision impact or reflect upon the Company?
Is input from a supervisor or other Company stakeholder needed?
Ask questions and ask for help to determine an appropriate course of action.

Act
Implement the decision. Take the necessary steps to act in accordance with the Code and Company policies.

How Do I Report Concerns and Code Violations?

The Company is committed to an environment where open, honest communication is the expectation, not the exception. We have an Open-Door policy that gives each Team Member, regardless of position or status, the opportunity to discuss with leadership any problem, complaint, suggestion, or question concerning their job or working condition, without fear of retaliation or reprisal. Our goal is to resolve work issues as quickly as possible by allowing each Team Member to bring their questions and concerns to the attention of Company leadership.

Everyone has an obligation to follow the Code. If a Team Member has questions about the Code or is concerned about conduct that may violate the Code, they may contact any of the following for assistance:

Where to get help

- Store Manager / Store Leader
- District Manager / District Leader
- Division Director
- Human Resources Department at 877-237-8306
- Corporate Compliance Officer (870) 881-6883

Compliance Hotline

- Ethics Hotline 800-566-8257
- http://www.murphyusa.ethicspoint.com
- ethics@murphyusa.com

Q) What happens when I call the Ethics Hotline or submit an online report to EthicsPoint?

A) EthicsPoint is a third-party vendor that the Company partners with to allow a Team Member to file a confidential report (and anonymously if they should choose), via either the telephone or the internet, 24 hours a day, seven days a week. Although EthicsPoint allows Team Members to report anonymously, be mindful that an anonymous report can hinder our ability to fully resolve reported concerns. Teams Members should provide specific and detailed incident information to allow for an effective investigation. Once submitted, a report is forwarded to the Company for the necessary research and investigation. When a Team Member files a report with EthicsPoint, they will receive a report key to login and view the status of the concern, answer questions posed by a Company representative or add more information that will help resolve open issues. Any Team Member who makes a report is encouraged to check back regularly for questions or updates.

Investigations of Potential Code Violations

Upon receiving a concern or report of a potential violation, the Company will promptly conduct a fair, objective, and thorough investigation of the reported concern. The information a Team Member provides will be shared on an as needed basis to investigate and resolve the matter and will be kept confidential to the extent possible. Team Members are also required to maintain confidentiality during the course of an investigation, cooperate fully and honestly, and not interfere with the integrity of any investigation.

If the investigation determines a violation of Company policies, standards, or procedures has occurred, the Company will take appropriate action based on the circumstances involved. Any Team Member determined by the Company to be responsible for a violation may be subject to disciplinary action up to and including termination. Following an investigation and completion of appropriate corrective actions (if any are warranted), the reporting person will be advised that a thorough investigation was completed. Due to confidentiality concerns, full details about the results of the investigation may not be provided to the Team Member who made the report, unless required by law.

No False Reports

Team Members must act in good faith in their reports of potential violations or concerns related to the Code. Team Members who are untruthful, file false reports, or provide information which they know to be false are not acting consistent with our Principle of Integrity. This type of behavior is not in compliance with the Code and may result in disciplinary action, including termination of their employment.

No Retaliation

The Company has zero tolerance for and will not permit retaliation. The Company prohibits intimidation or threats against anyone for reporting Code violation concerns or cooperating in an investigation. Any Team Member who engages in retaliation will be subject to disciplinary action up to and including termination of employment. If a Team Member feels that they have been retaliated against, they should report it using one of the reporting channels listed above.

Nothing in this Code is intended to or will be used in any way to limit a Team Member's rights to voluntarily communicate with, file a claim or report with, or to otherwise participate in an investigation with, any federal, state, or local government agency, as provided for, protected under, or warranted by applicable law.

Q) I am concerned about my supervisor's conduct violating the Code. I feel like I should report it, but I am concerned that I will get in trouble and my supervisor will be mad. Should I report the conduct of my supervisor?

A) Yes. A Team Member has an obligation to report any violations of the Code in good faith that they know about or any conduct that appears to violate the Code. The Company has zero tolerance for retaliation. The Company prohibits intimidation or threats against anyone for reporting concerns or cooperating in an investigation. Additionally, a Team Member has the ability to report their concern anonymously through the Ethics Hotline.

OUR TEAM MEMBERS

We are dedicated to and understand the value of our Team Members. Because we know that our Team Members are our greatest asset, the Code includes policies to ensure a healthy and safe work environment and a culture that values diverse backgrounds, experiences, and viewpoints.

Maintain a Respectful Work Environment

The Company is committed to living its Principle of Respect and strives to create an environment where all Team Members feel valued, safe, accepted, and heard. The Company prohibits discrimination and harassment on the basis of race or color, national origin, religion, gender and gender identity, age, sexual orientation, marital status, family medical leave status, medical condition, physical or mental disability, veteran status or other personal status or characteristics that are recognized and protected under applicable federal, state, or local laws and regulations.

The Company expects all Team Members to treat each other with respect and not engage in bullying conduct. We define "bullying" as persistent threatening, humiliating, or intimidating workplace conduct, and we consider this type of behavior to be in direct opposition to our Principle of Respect.

Q) I think my supervisor is harassing one of my fellow Team Members, but I have never heard that Team Member complain about it. Should I or do I have an obligation to take action?

A) If a Team Member feels that they are observing conduct that is not appropriate, they are encouraged to report it. A Team Member may use the Ethics Hotline or contact Human Resources if they do not feel comfortable speaking to their supervisor about the matter.

Q) At the end of a meeting, a Team Member attempted to tell a funny joke, but I found it to be discriminatory. I do not feel comfortable approaching my supervisor about the matter. Do I need to take further action?

A) The Company maintains an Open-Door Policy. Team Members have the ability to talk with their supervisors and raise concerns. For our Murphy USA Field employees, this includes Store Managers, District Managers, and/or Division Directors. For our QuickChek Field employees, this includes Store Leaders, District Leaders, and/or the Director of Operations. If a Team Member prefers not to speak with or has already spoken with their respective supervisor and is dissatisfied with the response, they may use any of the reporting channels listed on page 5 of this Code or by clicking here.

Foster a Healthy and Safe Workplace

The Company keeps its Team Members safe by fostering and maintaining a strong safety culture and emphasizing our Team Members' role in identifying, mitigating, and communicating safety risks. Team Members are expected to comply with all health and safety regulations, policies, and procedures that apply to their job and work location, and to be familiar with the procedures for mitigating any hazards in their work area. Team Members are encouraged to immediately report any threats to workplace safety to allow for a rapid response.

The Company's commitment to its Team Members includes maintaining a violence free workplace. Team Members must not engage in violent acts or threats of physical violence, including the possession of a weapon on Company premises that is in violation of the Company's Prohibited Items and Substances Procedure. Weapons may include guns, explosives, knives, tasers, mace, pepper spray, and other weapons that might be considered dangerous or that could cause bodily harm.

Team Members are prohibited from reporting for work under the influence of alcohol, an illegal drug, or a controlled substance. Possessing, using, selling, or offering illegal drugs and other controlled substances is prohibited in all circumstances while on duty, on a Company premises, or while acting on behalf of Company in any capacity.

Protect Confidential Information of Team Members

The protection of our fellow Team Member's information is essential. The Company expects its Team Members to follow information security policies when accessing, maintaining, or discussing sensitive or confidential Team Member information or data. Specifically, Team Members must comply with the Company's "Our Information" Policy and should review this Policy and its related procedures when working with sensitive or confidential information or data.

Some examples of sensitive or confidential personal information or data may include, but are not limited to:

- Team Member's name, demographic data, social security number, birth date, address, phone number, e-mail address, emergency contact information, employment eligibility data, and benefits plan enrollment information.
- Usernames and passwords.

Q) I am attending a conference, and I lost Company equipment (i.e., phone, laptop, etc.) while I was traveling. It has files containing sensitive Team Member information. What should I do?

A) Immediately notify IT so that the access to the Company equipment can be restricted. It is critical that if access to Company property is compromised, whether it is a phone, computer, or lost paperwork, that a Team Member take steps to notify the appropriate Company representatives to limit the risk to the Company.

Q) I like to put a list of my Team Members' cell phone numbers on the register or counter at my store so that I can quickly find replacements if someone unexpectedly misses their shift. Is this allowed?

A) No. A Team Member's personal telephone number or any other confidential information should not be posted or otherwise displayed in a public place, even for short periods of time.

Q) I was working my shift as a cashier when I received a call from a Team Member's boyfriend asking for the Team Member's schedule. Am I allowed to provide it to him?

A) No. Another Team Member's work schedule should be treated as sensitive information and should not be disclosed on their behalf.

Avoid Conflicts of Interest

What is a Conflict of Interest?

A conflict of interest may arise when an individual's personal interests – family, friendships, financial, or social factors – may conflict with the interests of the Company.

When may Conflicts of Interest Arise?

There are many instances when a conflict of interest may arise in the business context. This section is intended to be a guide for Team Members to help identify potential conflicts, but Team Members should consult with their respective supervisors to assist them in determining when disclosure of an actual or potential conflict of interest is required so that it can be vetted by Human Resources appropriately. In certain circumstances, but not all, a potential conflict may be resolved through discussion and proactive management of a Team Member's involvement in a situation. In some instances, there may not be a resolution for the potential conflict, and it is simply prohibited conduct. Disclosure by Team Members is necessary to address these conflict-of-interest situations.

Financial Interests & Investments: Having a financial interest or investment in a competitor, supplier, or business partner of the Company can divide a Team Member's loyalty or create an appearance of a divided loyalty. If it is a large personal investment, then it may be difficult to put the Company's best interest ahead of the other financial partner. Team Members should not engage in competitive conduct with the Company and should be aware of how financial decisions or other business opportunities may create conflicts of interest for their employment.

Family & Personal: Our family members' actions, employment, or personal investments could create a conflict of interest. A Team Member's family member receiving improper personal benefits because of their position with the Company is not permitted. For example, if the Company is awarding contracts or running promotional campaigns, Team Members must disclose romantic or personal relationships that may interfere with objective decision making. It is important to not even create an appearance of having a conflict in loyalty to the Company based on personal or family investments.

Board Memberships: One way to exemplify our Principle of Citizenship is by serving on a board of directors for a non-profit organization. This kind of community service does not require prior approval, as long as the position does not interfere with a Team Member's Company responsibilities. However, serving on the board of directors for another company that competes with the Company, does business with the Company, or is publicly traded, may create a conflict of interest. This type of board membership requires advance approval by the Corporate Compliance Officer.

Outside Employment: A conflict of interest arises when a Team Member engages in outside employment or activities which actually conflict with the performance of the Team Member's job, including the Team Member's availability or job efficiency. There may be instances where a Team Member may take on another part time position or a paid hobby that does not interfere with their Company responsibilities. Team Members should consult with their supervisor before beginning such outside work.

Gifts & Entertainment: Team Members should use sound judgment and exercise caution when receiving gifts or entertainment in the course of, or relating to, their position with the Company. While spending time with our vendors or other business partners in social settings can help build relationships, those activities can also create the expectation or appearance of improper favorable treatment. Team Members must not accept any gift or offer of entertainment that may affect, or could appear to affect, their ability to act in the Company's best interest. Team Members should also comply with the Company's Travel Standard and Finance Policy when assessing the receipt of gifts and entertainment. More specific guidance on Gifts & Entertainment can be found in the following section.

General Rules for Handling Gifts & Entertainment

1) Offers for or receipt of gifts, entertainment, or personal discounts (unless generally offered to the public) should never be solicited and, when accepted, should be infrequent and of a reasonable and modest value. Examples of modest gifts would include: samples, food baskets, meals associated with business activities, and other nominal items under $100 in value.

2) A Team Member should NEVER accept cash or a cash equivalent (e.g., gift cards) as a gift. More specifically, field employees are not allowed to accept any favor or gratuity, including money or anything else of value from a store customer.

3) Meals or entertainment attended with a business relationship should be of an appropriate and reasonable value, not extravagant in nature, and occur with limited frequency. The venue should be appropriate for business. If the business relationship is not attending the meal or entertainment, then a Team Member should not accept the offer. A "business relationship" may include any third party that has influence over or connection to a decision for the Company, including, but not limited to vendors, suppliers, elected or appointed officials, or other business partners of any kind.

4) Travel and accommodations should not be paid for by a vendor or business partner. There may be limited exceptions approved by executive-level management for "group lodging" that is simultaneously provided to additional entities.

5) Gifts and entertainment provided from a business relationship should be limited in the same manner to family and personal relationships. There may be instances where it is appropriate for a spouse or other person, who is not a Team

Member, to accompany a Team Member to a meal or entertainment in the limited nature described above. It is recommended that such attendance be preapproved by a Team Member's supervisor.

6) Team Members should never accept a gift that creates the appearance of impropriety or could be seen by others as a bribe.

7) Do not give or accept gifts or entertainment that may look like an attempt to improperly influence a business decision, such as the Company's award of a Request for Proposal (RFP).

8) Gifts, entertainment, or other items of value given to customers, vendors, and suppliers should be supported by a valid business purpose and should be reasonable under the circumstances. Please be respectful of the conflict-of-interest policies of our customers, vendors, and suppliers.

9) If a Team Member has questions about whether certain gifts or entertainment are appropriate, they are encouraged to consult with their supervisor for guidance on the proper handling of the matter.

What if a Team Member has a Conflict of Interest or Potential Conflict of Interest?

Team Members are required to disclose any actual or potential conflict of interest and complete the certifications required by the Code. All information disclosed by a Team Member concerning actual or potential conflicts of interest will be treated as confidential, except to the extent necessary for the protection of the Company's interests or as required by law.

If a Team Member becomes aware of an actual or potential conflict of interest, promptly report it to Human Resources or through the Ethics Hotline's Conflict(s) of Interest reporting function (see "How do I report concerns and Code violations?" section above). Human Resources reviews potential conflicts of interest using the following process:

1) Human Resources will screen any report of actual or potential conflicts of interest.

2) Any statement which indicates a possible conflict of interest will be submitted to the Corporate Compliance Officer and elevated as appropriate for review. If it is determined that there is no conflict of interest, then no further action is required.

3) If it is determined that a conflict of interest does exist, an informal meeting will be arranged between the Team Member and a Company representative to determine a method for eliminating and/or further addressing resolution of the conflict. In case of doubt or extenuating circumstances concerning a possible conflict of interest, a full written report of the situation may be requested so that a decision can be made as to whether a conflict is involved.

4) Based on the meeting/written report, an appropriate course of action will be determined on how to handle or mitigate the actual or potential conflict of interest.

Any transaction involving a director or executive officer that constitutes a "related party transaction" under SEC rules[1] is evaluated by the Nominating and Governance Committee of our Board of Directors.

[1]Reg. S-K, Item 404(a).

Q) I am a part-time cashier at one of our stores and work primarily night shifts. I have an opportunity to take another part-time job as a cashier for another fuel provider that would allow me to work during the day. Am I allowed to take this position?

A) This is likely fine, but a Team Member should speak to their supervisor prior to taking the position. A Team Member would need to be cautious of scheduling to continue to fulfill their Company duties and not sharing confidential Company information with their other employer.

Q) A vendor sends me a holiday gift basket composed of various promotional items and snacks. I do not know the value of the basket. Is this something I can keep, or should the basket be returned to the vendor?

A) Holiday gift baskets are usually the type of gift a Team Member can accept. However, in this situation, the value is unknown but may exceed a nominal value, so it should be placed in a general area to be shared with colleagues.

Q) A vendor gave me suite tickets to attend an NFL game, and the vendor is not able to attend the game. Can I accept them?

A) No. These tickets are not of a nominal value, and the vendor is not attending the event with the Team Member for an appropriate business purpose. Return the tickets to the vendor and advise the vendor that these offers are against Company policy.

Q) I will be attending a conference where one of the Company's vendors will be present. The vendor has offered to pay for a round of golf and dinner on the day the conference concludes. Am I able to accept this gift?

A) Yes, the meal and entertainment are in a setting where a Team Member can discuss further business, and it is limited in nature. Team Members should be cautious of the frequency of scheduling these types of outings to avoid any appearance of impropriety in how the Team Member engages with other vendors. Team Members should also be cautious of and potentially limit these interactions when the vendor is completing a Request for Proposal (RFP).

Q) The Company is having bids submitted to select a new vendor to supply doors and windows for several stores. My husband's company submitted a bid that is under consideration. Is this a conflict of interest?

A) It is a potential conflict of interest. The Team Member should immediately disclose the relationship to their supervisor, and the Team Member must not participate in the vendor selection process on this project or other projects bid on by the husband's company. Alternatively, the Team Member may submit this matter to the Human Resources Department or the Ethics Hotline.

Q) I have the opportunity to sell eggs at the farmers market each weekend. Is this considered outside employment that I cannot engage in?

A) This is a permissible activity. It is not competitive with the Company, and as long as it does not interfere with normal work hours or shifts, it would not be cause for concern. Like any hobby, a Team Member will need to manage their time appropriately between work and outside activities.

Q: I am an Assistant Manager at one of our stores and run a landscaping business on the weekend. Can I cut the store's grass on the weekend and submit or pay an invoice for my services to the store?

A) No. This would constitute a conflict of interest. It would be improper for a Team Member's personal side business to benefit based on a position at the Company. It would also be improper for a Team Member to select family or friends to provide this landscaping service to the Company.

Q: I was contacted by an industry group that wants me to sit on a panel to answer questions or be interviewed one-on-one for an upcoming article about challenges for retailers. Am I allowed to participate?

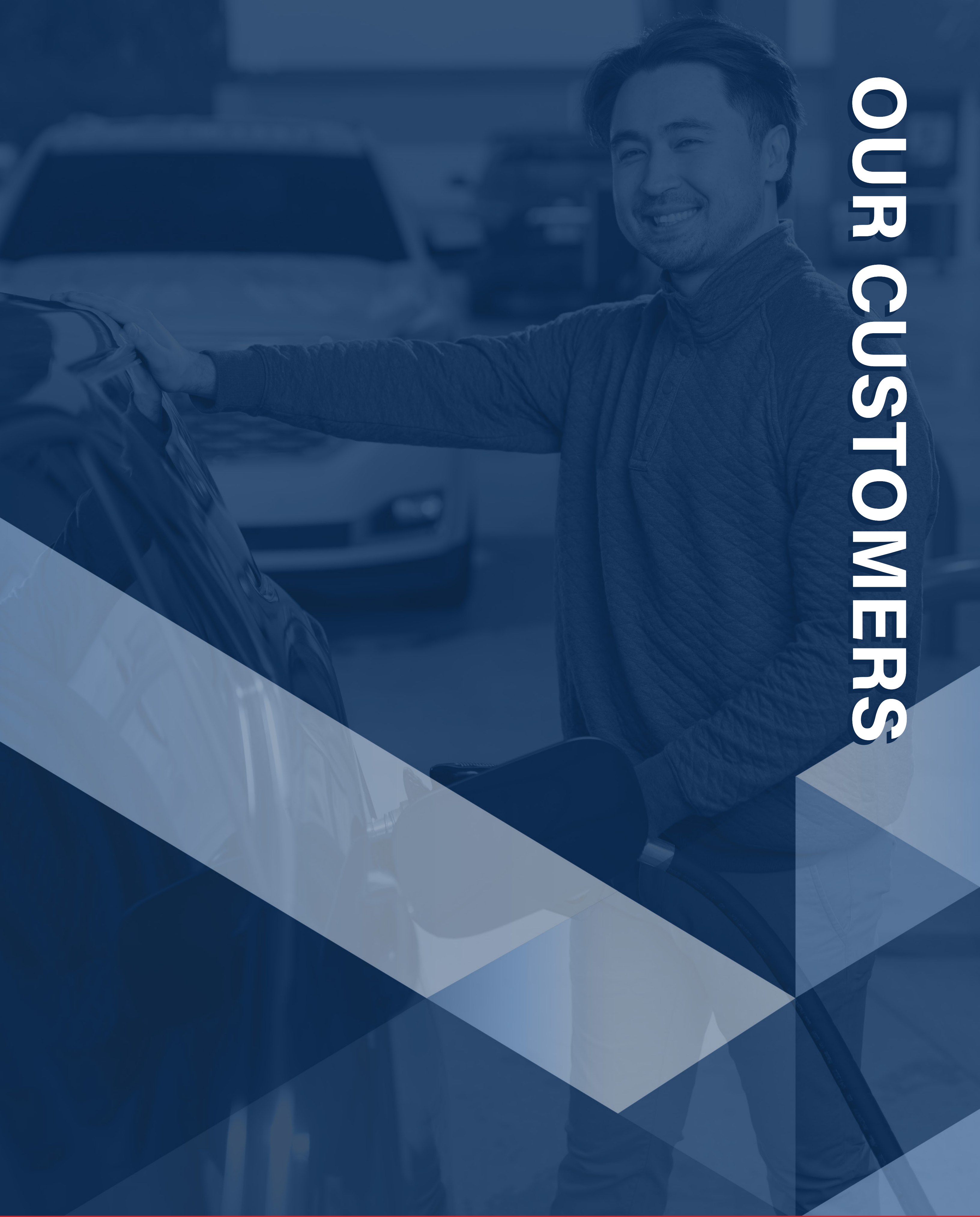
A) The Company generally refrains from these types of requests. If a Team Member receives a request of this nature, before agreeing to participate, they should contact the Corporate Compliance Officer to determine whether the nature of the questions could lead to responses that violate the Code.

Q: I was contacted by an industry group that wants to pay me a stipend to answer survey questions about the Company's vendors and how the Company selects vendors. Am I allowed to answer the survey?

A) Team Members are likely not allowed to respond to the survey. Team Members may contact the Corporate Compliance Officer to determine whether they are permitted to discuss these topics with the industry group.

Q: A vendor wants to pay for me and my spouse to fly to San Diego to have dinner at an expensive restaurant and then tour their facility to see their new product line to sell in our stores. Am I allowed to take this trip?

A) Probably not as outlined. It would be appropriate to travel to see their new product line if it would develop a positive business relationship for the Company. The Company should pay for the travel of the Team Member to develop the relationship. Spousal travel should not be paid for by the Company or vendor. If a Team Member's spouse attends, all expenses of the spouse would need to be paid by the Team Member personally. The extravagant or expensive nature of the trip would also need to be considered to determine whether it creates a conflict of interest. There is an expectation of good judgment in engagement with vendors to ensure that there is not an inappropriate appearance of favoritism or preferential treatment.



OUR CUSTOMERS

Comply with Fair Dealing, Fair Competition, and Anti-Trust Requirements

Each Team Member should deal fairly with the Company's customers, suppliers, competitors, and fellow Team Members. The Company should not obtain an unfair advantage through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice. The Company follows anti-trust and fair competition laws in all locations where it conducts business.

Team Members must not discuss with any third party the non-public, competitively sensitive information of the Company that does not directly relate to the Company's business dealings with such third-party. Team Members should not share pricing, supplier/vendor information, or sales objectives with any actual or potential competitor of the Company. Be aware that association and industry meetings pose special risks because these events bring together competitors, which increases the risk of a discussion about competitively sensitive matters. Team Members are encouraged to use good judgment and avoid discussing anything that could even appear to violate competition laws.

Q) We hired a new Team Member who used to work for a competitor. Can I ask her to share some of her former company's product pricing strategies?

A) No. This would likely be considered proprietary competitor information that should not be shared with us. Confidential business information is often protected by agreements when an employee leaves a position of employment. Do not put a new Team Member in the position of being asked to disclose confidential business information of a competitor.

Q) One of our vendors is offering special pricing on a new product release. I want to tell the vendor that we will cut our purchase orders with the vendor if he also offers this special price incentive to one of our competitors. Can I do this?

A) No. A Team Member may not tie the quantity of our purchases to the vendor's decision to sell or how to sell to our competitors. This would be a violation of the anti-trust/anti-competition laws

Maintain Proper Relationships with Suppliers and Vendors

It is expected that our suppliers and vendors will act in an ethical manner, consistent with our Principles and this Code. We expect all vendors and suppliers to 1) comply with contractual commitments; 2) protect confidential information of Company and our customers; and 3) conduct business ethically and lawfully. If a Team Member believes that a supplier or vendor is failing to meet the requirements and expectations of this Code, this should be reported immediately to the Company's Corporate Compliance Officer.

Q) I anticipate executing a contract for a new product to sell to our customers. The product is subject to certain government regulations related to its sale. There is pending legislation to relax the standards for selling the product. Our vendor notifies me that he is going to make a large campaign contribution to sway the vote of a legislator opposing the legislation. Do I have an obligation to report this vendor's conduct?

A) To the extent that the vendor is attempting to engage in a bribe, this would merit reporting the conduct. Be cautious in this scenario as there are also instances where a personal political contribution may be a permitted course of action. Reach out to the Corporate Compliance Officer for further discussion or disclose the issue through the Code's other reporting channels.

Safeguard Customer Information, Company Information, and Trade Secrets

Customers, suppliers, and third parties often entrust the Company with confidential information during a business transaction. With respect to customer information, customers provide us with their payment method at the point of sale and provide other information as they interact with our customer loyalty programs. It is a Team Member's responsibility to always safeguard this customer data. Team Members are responsible for knowing Company policies on handling personal and confidential information, what information is sensitive or confidential, how to handle and protect it, and how to properly store or destroy this data. Violations of these requirements may be subject to disciplinary action, up to and including termination.

It is also necessary to protect trade secrets of the Company. No Team Member should use, publish, or otherwise disclose any of the Company's trade secrets, proprietary, or confidential information to any individual, publication, corporation, business, competitor, or other entity. The terms "trade secrets", "proprietary" information and "confidential" information mean any formula, document, pattern, program, device, plan, method, technique, process, compilation or piece of information, including personal information, which is used or may be used by the Company in its business, and which is not available to the Company's competitors in the general domain. This includes any information not generally known in the relevant trade or industry which is disclosed to, discovered by, or known to a Team Member or consultant because of that person's position with the Company, including financial, purchasing, accounting, and selling information.

Some examples of confidential information or trade secrets may include the following:

- Purchasing or pricing information.
  - Costs to buy a new store location.
  - Volume required to receive a discount on certain products that are sold in our stores.
- Customer information.
- Financial information.
  - Profits.
  - Business forecasts and budgets.
- Legal matters or communications with attorneys.
- Company surveillance footage.

Please note this list is only to provide examples and is not exhaustive. If a Team Member has questions of whether information is protected, sensitive, or confidential, ALWAYS ask before disclosing.

Responsible Use of Artificial Intelligence

Team Members are expected to use Artificial Intelligence ("AI") responsibly, ethically, and in accordance with the Company's AI Governance Procedure. AI may support, but does not replace, human judgment, accountability, or decision-making. Team Members must protect confidential information, verify the accuracy of AI-generated content before use, and use only approved AI systems for approved business purposes. All AI use must comply with applicable laws and the Company's AI governance requirements.

Protect Company Assets

All Team Members should protect the Company's assets and ensure their efficient use. Company assets include financial assets, property, inventory, software, information technology, and other Confidential/Sensitive Data as defined in the Company's procedures. All Company assets should be used for legitimate business purposes. Theft, fraud, carelessness, and waste or misappropriation of Company, Team Member, supplier, or customer property is inconsistent with our Principle of Integrity and may also have a direct impact on the Company's profitability. Violation of this policy may subject a Team Member to personal legal action and associated penalties.

OUR COMMUNITIES

Prevent Bribery, Fraud, and Corruption

Acts of bribery, fraud, and corruption by a Team Member, either for personal benefit or for the benefit of the Company, will not be tolerated. "Bribery" is defined as the offering, giving, accepting, or soliciting anything of value in exchange for an action which is illegal or unethical. Team Members must also comply with all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act. Such laws are designed to prevent payments or otherwise providing value (cash equivalents, in-kind donations, or other services or goods), directly or indirectly, to an entity or person, including government officials, for the purpose of securing a business advantage. Never pay, promise to pay, or accept anything of value directly or indirectly that may improperly influence the business judgment or actions of others. Team Members that receive such requests for payments or bribes of any nature should notify the Corporate Compliance Officer and their supervisor.

Q) The Company is opening a store in a new market. A local government official recently offered to expedite the permit approval process for a cash payment. Can the Company make this payment?

A) No. Most anti-corruption laws prohibit facilitation payments of this nature, and it is the policy of Company not to make such payments even where permitted by applicable law. The Team Member should not make the payment and should alert their supervisor and the Corporate Compliance Officer.

Q) A supplier of the Company is hoping to receive additional orders. A Team Member communicates to the supplier that a big order will be forthcoming if the supplier contributes a large donation to the charitable organization that this Team Member supports. Is this allowed?

A) No. The action by the supplier may provide an indirect business advantage and is considered an indirect bribe.

Protect the Environment

The Company is committed to conducting business in a manner that is safe, efficient, and protective of human health and the environment. To that end, we have adopted health, safety, security, and environmental procedures that demonstrate our commitment to responsibly managing the products that we handle and sell at our store locations and terminals. All Team Members must comply with these procedures and the applicable safety and environmental laws and regulations in the communities we serve.

Use Social Media Responsibly

Team Members using social media must comply with the Company's Social Media Procedure. Unless expressly authorized for a work-related purpose, personal use of social media by Team Members during work hours should be minimal. When a Team Member does post, they must always be respectful of the Company, fellow Team Members, customers, suppliers, vendors, and competitors. Do not engage in behavior that will reflect negatively on the Company's reputation. Do not disparage the Company, its products, or any other Team Members, even if specific names are anonymized or not mentioned. If a Team Member discloses their affiliation with the Company on their personal social media account, they should clearly indicate that the opinions expressed are personal and not necessarily those of the Company. Any information that may be considered confidential or proprietary information of the Company, its customers, vendors, or suppliers must not be shared on social media.

Q) I have just taken a new position with the Company. Can I update my LinkedIn profile with my job title and where I work?

A) Yes. In most cases, there is nothing wrong with sharing a job title or location of work, as long as the Team Member follows our policies and makes sure it is clear that they are not speaking for the Company when sharing online. There are certain positions that may require confidentiality and should not be disclosed. These positions will be notified of any restrictions.

Q) While I was working in the store, I recorded a video of a customer doing a funny dance by a fuel dispenser while they were waiting for their car to fill up. Can I post this to my personal TikTok account?

A) No. Team Members are not allowed to post pictures or videos of store property or customers. Also, Team Members should not post to their personal social media accounts during a shift. Pictures, images, or videos obtained on or of Company property, products, customers, team members, or vendors are not permitted to be posted on a Team Member's personal social media.

Q) I have a personal social media account where I will regularly post my political beliefs. Sometimes my posts can be extreme in nature. Several of my Team Members follow my social media account and complained to our supervisor that they were uncomfortable with the contents of my posts. Did I do anything wrong in posting my beliefs?

A) Possibly. An investigation would be conducted regarding the Team Member complaints. It is important to remember that even in personal posts, a Team Member should always be respectful of the Company and fellow Team Members, customers, and vendors. Content published on social media sites should not contain commentary, content, or images that are defamatory, profane, pornographic, harassing, threatening, abusive, embarrassing to another person, or have the potential to create a hostile work environment. This includes, among other things, offensive content about race, gender, age, sexual orientation, religious or political beliefs, national origin, or disability.

Communicate with One Voice

Communicating with "one voice" helps to ensure that information released to the media and the public is accurate and consistent. Designating one spokesperson will help avoid confusion that can take place if multiple sources are cited. No Team Member or representative of the Company may speak to the media (through social media or otherwise) unless explicitly approved to do so by the President and CEO, Chief Financial Officer, or the General Counsel. If a Team Member receives a request for information from a reporter or media outlet, they should immediately escalate the request in accordance with the Company's Media Contact Procedure. Additionally, endorsements, such as a political endorsements or contributions, made when a Team Member is representing the Company in an official capacity, are prohibited without the approval of the General Counsel.

OUR SHAREHOLDERS

Do Not Trade on Inside Information

Inside information must be kept strictly confidential, and it is illegal to trade securities (stock) while a Team Member has Inside Information. These restrictions on trading apply both to Company stock or another company's stock, such as a Company vendor or supplier, that is impacted by the Inside Information of the Company.

In addition to applying to Team Members, the prohibition against trading on Inside Information applies to family members (spouses, domestic partners, and minor children) and anyone to whom a Team Member provides significant financial support.

Do not share any Inside Information with family, friends, or any other person. Sharing Inside Information or "tipping" can result in serious civil and criminal penalties for both the Company and for the individual involved.

Team Members are also prohibited from engaging in any Hedging transactions that are designed to hedge or speculate on any change in the market value of the Company's securities.
If a Team Member has questions about whether an action is prohibited or information is confidential, they should contact the Corporate Compliance Officer at 870-881-6883.

Directors, officers, and other designated insiders are also subject to certain trading restrictions based on the timing of a trade pursuant to the Company's separate Stock Transactions Guidelines, which are periodically communicated to these insiders by the General Counsel.

Key Definitions:

"Hedging" – Buying or selling an investment made with intent of reducing the risk of loss.

"Inside Information" – Information that is (1) Material and (2) Non-Public information.

Information is *"Material"* if a reasonable investor would consider the information to be important when making an investment decision. Material information can be favorable or unfavorable. If it is not clear whether information is Material, it should be treated as if it was Material. Common examples of Material information include, but are not limited to:

- Unexpected financial results.
- Unpublished financial reports or projections.
- Information about existing or potential business plans, product developments, innovations, or major transactions.
- Interruption of business or significant changes by management.
- New products or projects.
- Major outcomes in litigation.
- Mergers or acquisitions.

Information is *"Non-Public"* if it has not been publicly disclosed in a manner making it available to investors generally on a broad-based non-exclusionary basis. If it is not clear whether information has been publicly disclosed, it should be treated as if it is Non-Public information.

Maintain Accurate Books and Records

The Company maintains appropriate books and records of assets, liabilities, and business transactions. This means financial and other business information will be maintained under procedures and practices that ensure accuracy. Since the accuracy of the Company's entire financial system relies on individual entries, Team Members are expected to properly record business transactions in a timely manner. This applies whether the transaction is big or small - from preparing time sheets and expense accounts to posting accounting data and recording major capital investments. It also means proper records management practices must be followed. Secret or unrecorded funds, making false or misleading entries, or preparing misleading reports will not be tolerated. In addition, Team Members must comply with the applicable requirements related to proper storage and destruction of books and records as governed by the Company's "Our Information" Policy. Team Members responsible for maintaining books and records should refer to and comply with the Records and Information Management Procedure within the "Our Information" Policy.

Comply with Public Disclosures

The Company has a responsibility to provide full and accurate information in our public disclosures, in all material respects, about the Company's financial condition and results of operations. The Company's reports and documents filed with or submitted to the SEC and our other public communications shall include full, fair, accurate, timely, and understandable disclosures.

Q) My cousin asked me whether it is a good time to buy Company stock. What should I tell them?

A) Be cautious in answering. Do not share any Inside Information. Refer them to the Company Investor Relations website to help them learn about the Company through publicly available information.

Q) A Team Member learned that the Company was going to significantly surpass earnings expectations for the quarter and disclosed this information to her father over dinner. Her father then purchased shares of the Company's stock. Would this constitute a violation of insider trading laws?

A) Yes. After earnings were released, the stock price went up and the Team Member's father sold the stock making a substantial profit. Both the individuals will likely be found to have violated the law.

Prohibition on Prediction Market Wagers/Bets

Team Members are prohibited from entering into any contract, or making any wager or bet, on any prediction market (i) relating to (directly or indirectly) the Company, its operations, its financial condition or its securities, or (ii) using any Inside Information that the Team Member learns in the course of his or her employment or service with the Company, whether such Inside Information relates to the Company, a customer, vendor, supplier, business partner, competitor, or any other company or issuer.

Administration of the Code

Certification of Compliance with the Code

Each Team Member will be advised of this Code and receive training on the Code when they onboard with the Company and periodically throughout their employment with the Company. Each Team Member will have a certification on file with the Company addressing their conformance and pledge of future compliance with the Code. Team Members will be requested to update such certifications approximately once every two years. Please refer to the Appendix to view the certification, which may be revised periodically in the Company's discretion.

Waivers, Amendments, and Modifications of the Code

There will be no waiver of any part of the Code for any director or officer, except by a vote of the Company's Board of Directors or a designated board committee that will ascertain whether a waiver is appropriate and provide the prompt disclosure of the waiver to shareholders.

There will be no amendment or modification to this Code except by a vote of the Board of Directors or a designated board committee that will ascertain whether an amendment or modification is appropriate. In case of an amendment or modification of this Code, the notice of such amendment shall be disclosed promptly as required by applicable law.

Where to get help

- Store Manager / Store Leader
- District Manager / District Leader
- Division Director
- Human Resources Department at 877-237-8306
- Corporate Compliance Officer (870) 881-6883

Compliance Hotline

- Ethics Hotline 800-566-8257
- http://www.murphyusa.ethicspoint.com
- ethics@murphyusa.com

Effective August 2026

Appendix

Certification of the Code of Business Conduct and Ethics

I certify that I have received (either digitally or in print) and have read the Company's Code of Business Conduct and Ethics (the "Code"). I further certify that:

1. I have conformed to the Code and will exercise my best efforts to assure future compliance with the Code; and

2. In accordance with the Code, I do not have any actual conflicts of interest and will immediately disclose any conflicts of interest or potential conflicts of interest to my supervisor, Human Resources, the Corporate Compliance Officer, or through the Ethics Hotline's Conflict(s) of Interest reporting function.

Name ______________________________

Title ______________________________

Signature ______________________________

Date ______________________________