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|  | <b>Delek US Holdings, Inc.</b><br><br><b>Clawback Policy</b> | <b>LEGAL</b>                         |             |
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|   |  | Effective Date<br>September 23, 2020 | Revision: 3 |

## 1.0 PURPOSE

This clawback policy (this “Policy”) is adopted by the Compensation Committee (the “Committee”) of the Board of Directors (the “Board”) of Delek US Holdings, Inc., a Delaware corporation (the “Company”), effective as of the date set forth above.

## 2.0 SCOPE

This Policy applies to any current or former member of the Executive Team of the Company (an “Executive”) holding positions listed in Appendix I attached hereto.

## 3.0 POLICY

- 3.1 If the consolidated financial statements of the Company and its subsidiaries are materially restated within three years of the first filing of such financial statements with the United States Securities and Exchange Commission (the “SEC”) due to material noncompliance with any financial reporting requirements under applicable securities laws, then the Committee may, within 12 months after the first public announcement or filing with the SEC of such a material restatement, to the extent permitted by applicable law, require that the Executive forfeit and/or return to the Company all or a portion of any bonus or incentive compensation (“Incentive Compensation”) received or awarded for the period to the extent that the amount of Incentive Compensation that would have been awarded to the Executive had the financial results been properly reported would have been lower than the amount actually awarded and/or any compensation vested, awarded or received under any equity award (including any award of stock options, restricted stock, restricted stock units, performance-based restricted stock units or other performance shares, phantom shares or stock appreciation rights) (an “Equity Award”) during the period subject to restatement; provided, however, that any forfeiture and/or return of compensation by an Executive under this policy will, in any event, be limited to any portion thereof that the Executive would not have received if the consolidated financial statements of the Company and its subsidiaries had been reported properly at the time of first public release or filing with the SEC.
- 3.2 If the Committee determines, in its reasonable discretion, that fraud or misconduct has caused significant financial or reputational harm to the Company or any of its affiliates, and that any current or former Executive engaged in such fraud or misconduct, or failed in his or her responsibility to manage or monitor the applicable conduct or risk that resulted in such fraud or misconduct, then, to the extent not prohibited by applicable law, the Committee may require that the Executive forfeit and/or return to the Company all or a portion of any Incentive Compensation and/or Equity Award received by or awarded to the Executive. For purposes of this Policy, misconduct shall include gross negligence.
- 3.3 The Committee may seek recovery in the manner it chooses, including by seeking reimbursement from the Executive of all or part of the compensation awarded or paid, by electing to withhold

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unpaid compensation, by set-off, or by rescinding or canceling unvested Equity Awards.

- 3.4 Any recoupment effort authorized by the Committee shall be subject to the provisions of applicable compensation or employment agreements, including dispute resolution procedures. This Policy shall be incorporated by reference into and shall apply to all performance-based compensation plans and awards granted on or after its adoption by the Committee.
- 3.5 Upon an Exchange Transaction (as defined in the Delek US Holdings, Inc. 2006 Long-Term Incentive Plan) or a Change in Control (as defined in the Delek US Holdings, Inc. 2016 Long-Term Incentive Plan), this Policy will be of no further force or effect unless prior to such change in control the Board expressly authorizes the continuation of this Policy.
- 3.6 By accepting any award as to which this Policy applies, each Executive must agree to be subject to this Policy and thus agree to forfeit and/or return compensation to the Company, as provided by this Policy, as this Policy may be amended from time to time by the Committee, including an amendment, or replacement of this Policy with another clawback policy, adopted by the Committee as the Committee may deem necessary, advisable or appropriate including, without limitation, a policy adopted to comply with regulations issued by the SEC under the Dodd-Frank Wall Street Reform and Consumer Protection Act.
- 3.7 The terms of this Policy shall in no way limit the ability of the Company to pursue forfeiture or reclamation of amounts under applicable law as the Committee may consider appropriate in its reasonable discretion.

#### **4.0 RESPONSIBILITIES & AUTHORITY**

- 4.1 This Policy shall be administered by the Committee, and all determinations or interpretations made by the Committee shall be final and not subject to further review.
- 4.2 The Chief Human Resources Officer of the Company shall update Appendix I from time to time to reflect the current members of the Executive Team.

#### **5.0 RELATED DOCUMENTS**

- 5.1 Delek US Holdings, Inc. 2016 Long-Term Incentive Plan, as amended

#### **6.0 DOCUMENT INFORMATION**

| Revision | Content Owner     | Executive Sponsor                       | Executive Review Committee Approval Date | Policy Effective Date |
|----------|-------------------|---|--|-----------------------|
| 3        | Sr. Lead Counsel, | General Counsel and Corporate Secretary | September 23, 2020                       | September 23, 2020    |



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|   | Corporate & Securities                   |   |                |                |
| 2 | Sr. Lead Counsel, Corporate & Securities | General Counsel and Corporate Secretary | May 6, 2020    | May 6, 2020    |
| 1 | Sr. Lead Counsel, Corporate & Securities | General Counsel and Corporate Secretary | March 24, 2016 | March 24, 2016 |

**NOTICE:** The information contained herein is the confidential property of the Company and should not be relied upon by other parties.

Delek US Holdings, Inc. Clawback Policy

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**Appendix I**  
Executive Team

1. Chief Executive Officer
2. Chief Financial Officer
3. Chief Operating Officer
4. All EVPs
5. SVP - Investor Relations & Market Intelligence
6. SVP, Delek Logistics
7. Chief Information Officer
8. VP, Innovation
9. SVP, Refining