



**CODE OF
BUSINESS
CONDUCT
& ETHICS**

Table of Contents

- Introduction..... 3**
- Mission Vision Values Behaviors 5**
- Quality, Health, Safety, Environment 8**
 - Health and Safety
 - Quality
 - Environmental Stewardship
- Workplace Conduct..... 10**
 - Mutual Respect
 - Non-Retaliation
 - Open Door Policy
 - Workplace Violence
 - Social Media
 - Alcohol and Drugs
 - Drug & Alcohol Dependency
 - Data Privacy
 - Learning and Development
 - Equal Opportunity
- Marketing and Communications 14**
 - Business Communications
 - Careful Communications
 - Political Activity/Lobbying
 - Political Donations
- Conflicts of Interest..... 15**
 - Gifts and Hospitality
 - Receiving Gifts
 - Insider Trading
- Legal 17**
 - Anti-Bribery & Anti-Corruption (ABC)
 - Government Officials
 - Gifts, Travel and Hospitality
 - Independent Sales Representatives
 - Fair Competition
 - Anti-Trust Statements
 - International Operations
 - Trade Controls
 - Money Laundering
- Protecting our Assets..... 20**
 - Property and Equipment
 - Intellectual Property
 - Information Security
 - IT System Controls
 - Information Security Guidelines
 - Challenge Yourself
- Financial..... 24**
 - Financial Accounting and Reporting
 - Disclosure
- Reporting Issues and Concerns 25**
 - Reporting Obligations
 - WIS Ethics Hotline and Website

Interactive Navigation: Click any line in the Table of Contents (TOC) to go directly to that page. To navigate back to the TOC, click anywhere in the footer section at the bottom of each page or on the TOC icon.



Introduction

Establishing and maintaining Wellbore Integrity Solutions' reputation as a global leader in wellbore integrity products and services is essential to the future of the Company and is every employee's responsibility. WIS's Code of Business Conduct & Ethics (the "Code") contains certain obligations and expectations to assist you in fulfilling this responsibility. The Code formally embodies the Company's values and key policies to help guide us in making decisions with integrity and confidence. We ask every member of the WIS team to make a personal commitment to follow our Code.

Although the Code cannot provide guidance for every possible scenario, it establishes a foundation for sound decision making and empowers you to do so. It provides support for you to act with integrity and honesty and to comply with all applicable laws. When faced with decisions, please also refer to Company policy, talk to your supervisor and/or contact one of the other resources highlighted in the Code. Always ask yourself if an action or decision is legal, ethical, and complies with the policies of Wellbore Integrity Solutions. If you can answer "yes" to these questions, you are on the right path.

The Code applies to all WIS employees, contract personnel, officers, and members of the Board of Directors (collectively "employees" in this Code). It impacts those with whom we do business, including customers, contractors, suppliers, independent sales representatives and even government officials. You should become familiar with it and follow the letter and spirit of the Code. Those who violate the Code are subject to disciplinary action, up to and including termination. Any waiver of this Code may only be made by the Board of Directors of Wellbore Integrity Solutions. If a law conflicts with the Code, you must comply with the law; however, if a local custom or policy conflicts with this Code, you must comply with the Code.

If you have any concerns about potentially illegal or unethical business conduct, including potential violations of the Code or Company policy, you are obligated to report it. You can report such concerns by speaking to your supervisor, any senior manager in the Company, a Human Resources representative, someone in the Legal or Corporate Compliance department, or by calling the WIS Ethics Hotline (the "Hotline"). The Hotline may be called at any time to anonymously or confidentially report any concerns not being addressed through normal channels. Your identity as a caller will be kept confidential to the extent reasonably possible and consistent with the law and good business practices. Information on the Hotline is included in the section at the back of the Code. Our policy protects you from retaliation if you, in good faith, make a report or assist in good faith in the resolution of an investigation or proceeding.

Our Company is built on a solid heritage of operational excellence, customer focus and a well-known commitment to the highest ethical standards. As we continue to build Wellbore Integrity Solutions and live up to the Company's heritage, let's ensure we all conduct our business, in every location, consistent with the Code.

Our Company is built on a solid heritage of **operational excellence, customer focus** and a well-known commitment to the **highest ethical standards.**



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OUR VALUES

Define our company and how we conduct our business.

Mission — Vision — Values — Behaviors



OUR MISSION

Create a people centric company delivering profitability, growth, and a greener future focusing on superior technology, value, and service quality for our customers.

OUR VISION

To be recognized globally, focused on innovative solutions to increase asset value, operational efficiency, and reduce environmental risk for all our futures.

OUR VALUES



Well-Being and Environmental Stewardship

Protect our people; preserve the communities and environments where we work.

Guiding Behaviors:

- Safety and respect for the environment guides all our decisions
- Support work life harmony
- Mental health is as important as physical
- Everyone is responsible and accountable to act safely and look after others



Trust and Teamwork

Conduct business with transparency, inclusivity, and trust.

Guiding Behaviors:

- Build diverse teams; respect different viewpoints
- Be transparent and inclusive in open/honest communication
- Everyone has a voice
- Encourage collaboration; share ideas, lessons learned, information and seeks help and to help others

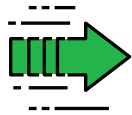


Customer Focus

Strive to exceed customer expectations.

Guiding Behaviors:

- Understand customers needs, requirements and values
- Take ownership and accountability to address problems and opportunities
- Collaborate with customers and understand everyone has a role in providing the best solution
- Strategic thinking



Deliver Results

Drive financial performance for WIS stakeholders and customers.

Guiding Behaviors:

- Deliver quality products and customer services
- Be cost and profitability conscious for all products and services delivered
- Focus on maximizing asset value for customers while reducing risk and/or time
- Focus on training and development

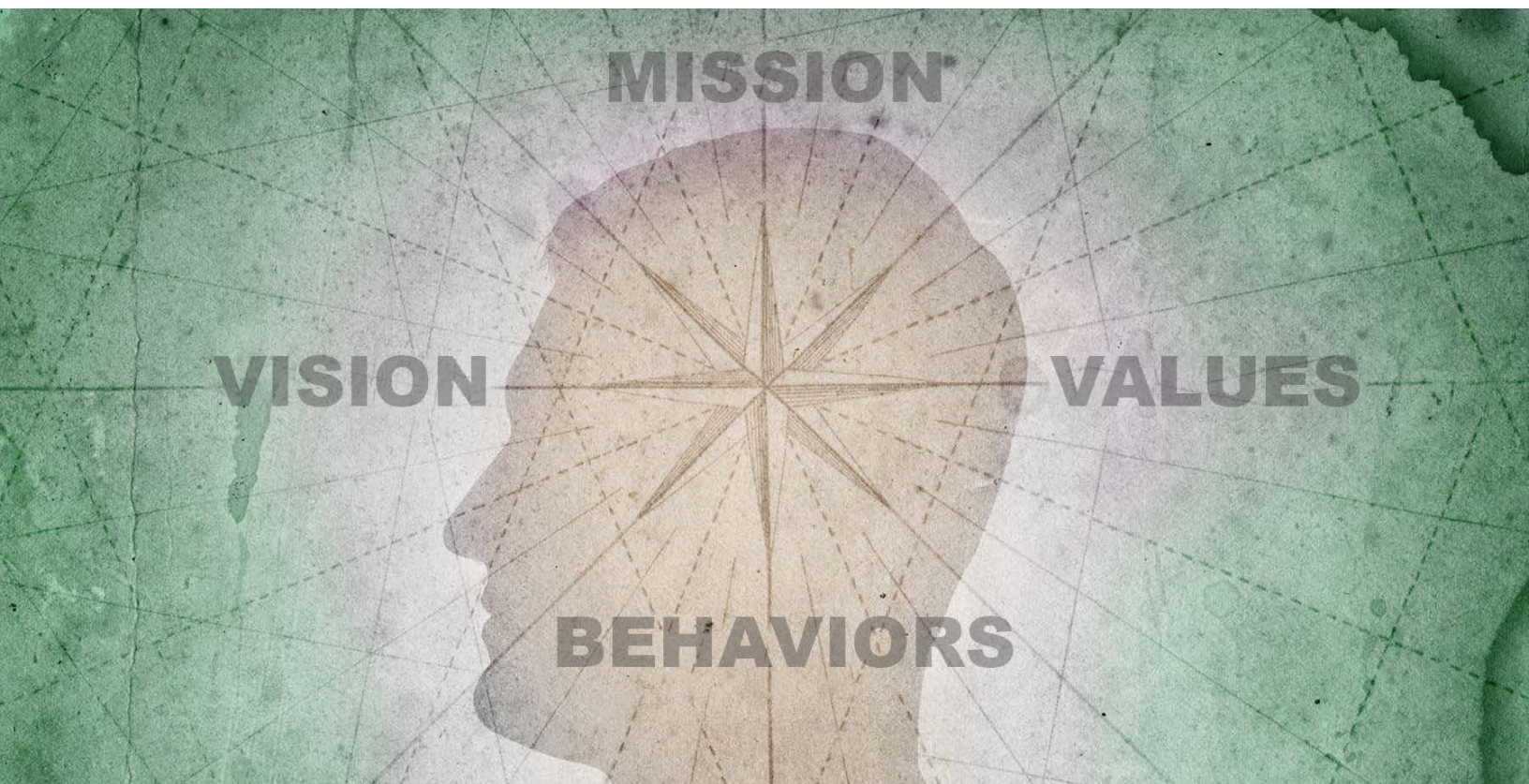


Enterprising

Be open and receptive to creative thinking.

Guiding Behaviors:

- Welcome new ideas, opportunities, and ways of working
- Reward entrepreneurial thinking and endeavors
- Challenge each other to stretch beyond the norm
- Employees are empowered and supported to step out of their comfort zones



We believe that **excellence in safety performance** and **environmental stewardship** are the guiding principles of good business.



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Quality, Health, Safety, Environment (QHSE)

At Wellbore Integrity Solutions QHSE performance is a part of our business strategy, differentiates us in the marketplace and drives our continued success. By protecting people and preserving our environment, we assure the vitality of our business, as well as the sustainability of our operations. Safety and environmental stewardship begins with the leadership and commitment of our management team. Every employee has the obligation to comply with our policies, applicable regulatory requirements and recommended industry practices.

The foundation of our QHSE Policy begins with adherence to applicable laws, regulations, and industry standards. In the course of running our business, at times we find it necessary to go beyond mere compliance with government regulations. The health, safety and environmental implications of our actions must remain at the forefront of our decision making.

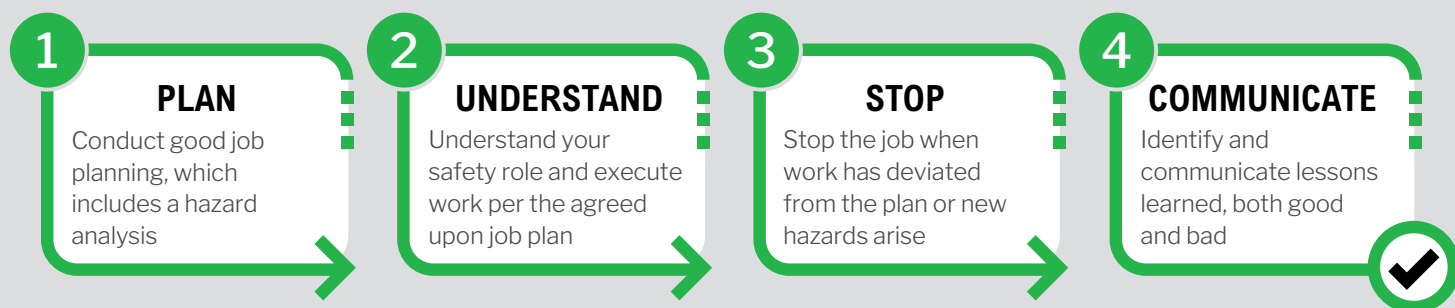
We believe in the importance of open communication on environmental, health and safety issues with our employees, governments, environmental organizations, and communities.

Health and Safety

In conducting our operations, all of us, regardless of position, are obligated to:

- Identify potential hazards and stop any operations or practices which, in our opinion, can threaten the safety or health of any person or can lead to harming the environment
- Maintain our facilities such that they can be operated in a safe, environmentally sound and compliant manner
- Adhere to WIS policies and procedures in addition to applicable laws, regulations and industry standards
- Inform our managers and supervisors of issues affecting the ability to meet WIS's expectations regarding health, safety and environment
- Encourage open communications and adherence to health, safety and environmental requirements
- Understand and comply with the laws and regulations that may apply specifically to our jobs

FOUR BASIC STEPS FOR SAFETY



These four simple steps apply equally well whether you are in a facility, in the field, in the corporate office or even at home doing work around the house.

Quality

WIS's commitment to quality includes a Quality Policy that WIS will provide its customers with products and services that are safe, reliable, cost effective and of the highest quality. Our objectives under the policy are to:

- Focus on continuous customer satisfaction and quality improvement in all the Company's activities worldwide
- Consistent monitoring of customer requirements and their future needs
- Identification and integration of best practices and lessons learned to enhance our continuous improvement in being the most respected provider of our products and services for our people, performance and results

Environmental Stewardship

At WIS, our commitment to social responsibility is demonstrated by our efforts to be good environmental stewards. Our goal is to protect the environment from harm and sustain the ecosystems in which we operate. To ensure the protection of our people and the environment, our environmental requirements are communicated on a regular basis to all employees.

In conducting our operations, all of us, regardless of position, are obligated to:

- Work within environmental limits established by WIS and government issued permits or regulations
- Not make modifications to processes, procedures or equipment without an approved Management of Change, which includes updating drawings and documents to reflect any changes
- Strive to eliminate waste or accidental releases of pollutants into the environment
- Inform our managers and supervisors of issues affecting the ability to meet WIS's expectations regarding environmental stewardship

KEYS TO ENVIRONMENTAL STEWARDSHIP



1. Include potential release scenarios in job planning.
2. Understand and adhere to environmental and operating limits.
3. Never modify any processes, procedures or equipment without an approved Management of Change.
4. Report all spills, releases or deviations from environmental or operating limits.

Workplace Conduct

Mutual Respect

We are fully committed to providing a workplace free from offensive or harassing conduct. This commitment involves respect for our employees and our business partners.

WIS will not encourage, permit or tolerate harassment on the basis of race, color, sex, religion, national origin, age, citizenship, disability status, veteran status, engaging in legally protected activity, or any other class protected by law. Harassment can take many forms, including:

- Abusive or offensive language or gestures
- Unwanted advances
- Demeaning comments or jokes
- Hazing
- Bullying or intimidation

Respect for the individual and a mind-set of accountability underscore WIS's approach to all business relationships—both within and outside the Company.

Non-Retaliation

We do not tolerate retaliation in any form in response to reports made in good faith or in response to assistance in good faith in the resolution of an investigation or proceeding. Retaliation includes actions such as firing, demoting or transferring someone, as well as avoiding or excluding the person from professional activities.

Open Door Policy

We encourage honest and open communication. All of our employees are encouraged to seek information from their supervisor regarding issues that are troubling them. These informal discussions often enable problems to be cleared up without delay, and allow our management to make decisions with the best interests of our employees in mind.

Workplace Violence

We prohibit all violence, whether implied or actual, against our coworkers, visitors and anyone else on our assets or premises. We regard threats of violence as very serious. Any threatened or actual violence must be reported immediately and appropriate action will be taken. If you feel a coworker or anyone on WIS premises may become violent, speak to your supervisor or your Human Resources representative.



Social Media

Our computer and telecommunications systems should be used for Company purposes. Reasonable and appropriate incidental personal use is permitted, but we should all exercise discretion when using Company resources for personal activities. Personal use of our Internet and computer resources should not:

- Consume more than a trivial amount of resources
- Interfere with our productivity
- Preempt any WIS business activity

Under no circumstances should WIS Internet or computer resources be used to obtain, post or review any pornographic or otherwise illegal or inappropriate material.

You should not assume that any communications sent from WIS communication devices are private. All WIS communications are property of the Company, regardless of the device used to send the communication, including personal computer and mobile phone devices. Please refer to the “Acceptable Use Policy” found on the IT internal portal for more detail.

Only certain employees are authorized to publish information about WIS. Company information posted on blogs or websites by unauthorized employees may not only be an inappropriate disclosure, but may inadvertently trigger legal disclosure obligations. In addition, distributing or sharing information online, whether facts, speculations, rumors or criticisms of WIS, even on personal social networking sites, could harm our reputation and impair our business. Remember, actions that are unacceptable in other settings are also unacceptable online. Please refer to the “Global Corporate Social Media Policy and Employee Guidelines” found on the internal MarCom portal for more details.

Related Sections: Marketing and Communications – Business Communications and Financial – Disclosure

The Internet is not Private

The Internet is a public forum. It is important to protect your own confidential information, as well as the Company’s, on the Internet. Your WIS communications may be monitored by the Company.



Alcohol and Drugs

We strive to maintain a safe, healthy, efficient and effective work environment. Abuse of alcohol, drugs and other controlled substances impairs our ability to provide a safe and healthy environment for all employees. To maintain this environment, certain substances are prohibited from WIS's and our customers' facilities including: alcohol, drugs, including prescription medication not prescribed by a licensed physician, and drug paraphernalia.

Anyone under the influence of alcohol is prohibited from engaging in WIS business or operating WIS equipment. Under certain circumstances with pre-approval from executive management, alcohol may be permitted, such as at WIS-sponsored social events, in accordance with the policies governing such events.

Drug & Alcohol Dependency

If you feel you may have a dependency on drugs or alcohol, get help. Contact WIS's Benefits Department for information on the Company's employee assistance program. As a condition of your employment, you may from time to time be subject to testing for illegal drug or alcohol use.

Data Privacy

At times, WIS must gather and maintain certain information about our employees, but the Company will only gather information that is required by law or necessary to operate. WIS will only make this information available to authorized employees who need to use the information to conduct our operations.

Maintaining the security and integrity of stored personal information is vital. WIS will maintain all employee information securely and with proper controls in place to ensure that only authorized employees are able to access and view the information. These controls are designed to adequately prevent accidental or fraudulent loss of employee information.

Certain additional laws govern the transfer of personal information between countries. WIS is committed to complying with all applicable data privacy laws, both locally and globally.

Learning and Development

At WIS, our success results from the numerous decisions and contributions made by our employees every day. WIS is committed to provide our employees with the proper tools and to sponsor training opportunities to enable them to meet their job requirements. Our training opportunities and programs are primarily focused on:

- Safety, operations, supervisory and leadership programs
- Customized development programs, competency development and assurance, and employee and team performance



Equal Opportunity

WIS is an equal opportunity employer. We do not willfully discriminate against employees and applicants for employment based on:

- Race
- Color
- Gender
- Religion
- National origin
- Age
- Citizenship status
- Sexual Orientation
- Physical or mental disability of an otherwise qualified individual
- Military veteran status, or any other class protected by applicable law

Discrimination based on any of the factors listed above not only goes against our values, but may also violate the law.

Keep it Confidential

Certain types of information, such as medical updates about sick or injured employees, may be subject to data privacy laws, including the Health Insurance Portability and Accountability Act (HIPAA) in the United States or the Data Protection Directive in the EU.



Marketing and Communications

Business Communications

All outside inquiries or requests for information should go through the proper channels. Such requests for WIS information could come from the media, investors, analysts, government officials, or members of the public. Requests of this nature should be forwarded for handling by authorized management and the Marketing and Communications Department.

WIS's reputation and public image could be tarnished if we make inaccurate public statements. Such statements could also violate the law. We have designated employees who are trained and authorized to speak on our behalf.

We all communicate on a daily basis both internally and externally with third parties such our customers and vendors. Whenever we communicate, we should be careful to:

- Protect confidential business information
- Not mislead
- Not write speculative opinions
- Not exaggerate
- Not speak casually about sensitive or confidential matters
- Not joke about serious matters

Careful Communications

Be careful when writing e-mails, keeping in mind the context and the intended and potential unintended audiences. Information put in e-mails is discoverable and may be monitored by the Company. Communications with a competitor could violate fair competition laws; therefore, remember that WIS's business is WIS' business.

Political Activity/Lobbying

WIS's business requires us to maintain relationships with governments and government officials in countries around the world. Many of our employees frequently interact with government officials and regulators in order to ensure that we are operating lawfully and with all necessary authorizations and permits. Whenever we interact with these government officials, we should act with professionalism and conduct ourselves with integrity. Maintaining these relationships is crucial to our business.

At times, we may also use lawful channels to influence or better understand government policies and regulations. To accomplish these goals, we may hire outside consultants or advisors who must maintain the same professionalism and integrity that we expect from our own employees. Do not contact the government on behalf of WIS to influence legislation, regulations or decision making without prior approval from the Legal Department.

Donations

Our policy prohibits political donations to be made on behalf of WIS. Employees are not authorized to make donations to politicians, political parties or candidates for office on WIS's behalf. If you wish to make personal political donations, make clear that the donation is personal and not related to WIS.

Employees are also prohibited from soliciting, for personal reasons, donations or sponsorships from any Company suppliers or customers on behalf of any organization, cause or third party, including charitable and community organizations.

Conflicts of Interest

While conducting its business, WIS expects all its employees, officers, and members of its Board of Directors to act fairly and honestly in all relationships. Business decisions should be made free from any conflict of interest. No one should ever:

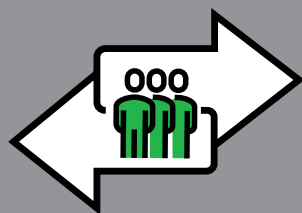
- Use their position or influence to get an improper benefit
- Use confidential WIS information for personal gain
- Take advantage of inside information for one's personal gain

Conflicts of interest can occur when our outside activities or interests conflict, or appear to conflict, with our responsibilities to WIS. Unless permission is first obtained as required by WIS's Conflict of Interest policy, a conflict of interest may occur when employees, officers, members of the Board of Directors or a member of their family:

- Has an interest in an outside company doing business with WIS where there is an opportunity for preferential treatment to be given or received
- Serves in a management or director capacity at another company in the energy services industry
- Discloses confidential information about WIS's business to someone outside the Company
- Buys, sells or leases equipment or property to or from WIS
- Accepts gifts or extravagant entertainment from someone soliciting business from WIS

We should always strive to deal fairly and openly with our customers, vendors and competitors. If you have any doubts about what may constitute a conflict of interest, first consult WIS's Conflict of Interest policy or consult with your supervisor, HR or the Legal or Corporate Compliance department. Disclosing the potential conflict of interest to management and acting in a transparent manner is what WIS expects from all its employees.

Related Sections: Conflicts of Interest – Gifts and Hospitality and Legal – Anti-Bribery and Anti-Corruption (ABC)



Family Ties

Family is a broad term and includes your and your spouse's immediate and extended families. If you wish to participate in a personal activity which you feel may create, or appear to create a conflict of interest, first consult WIS's Conflict of Interest Policy to determine the approvals which may be required.

Gifts and Hospitality

Our relationships with our customers and suppliers are an important part of our business. To help maintain those relationships, from time to time it is customary to offer nominal forms of gifts and hospitality. However, we should avoid situations where gifts and hospitality can influence our business decisions or create real or implied obligations, either for WIS or our business partners. Gifts should always:

- Be legal
- Serve a valid business purpose
- Be of modest value
- Be authorized by relevant policy

Receiving Gifts

If you feel that accepting a gift from one of our business partners will obligate you to provide preferential treatment to that partner, do not accept the gift. We should always be free from conflicts of interest when making business decisions.

We never give or accept gifts that are illegal in nature, gifts in cash, or gifts that will influence, or appear to influence, WIS or our business partners in making a business decision. We will never give a gift that could be seen as a bribe or a method of obligating someone else to provide a good or service for WIS's benefit. In general, WIS does not give gifts to government officials, as it could violate certain laws and regulations.

Related Sections: Legal — Anti-Bribery and Anti-Corruption (ABC)

Insider Trading

Because of our employment at WIS, we are at times privy to certain information concerning WIS, our customers, our suppliers and other business partners that is considered “material, non-public information”. Information may be considered “material” when the information, whether positive or negative, would be expected to affect the investment decision of a reasonable investor in a decision to purchase, sell or hold a security or if the disclosure would be expected to significantly alter the total mix of information in the market regarding such security. Information is “non-public” if such information has been effectively disclosed in a manner sufficient to ensure its availability to the investing public. Selective disclosure to a few persons does not make information public.

Some examples of potential “material, non-public information” include:

- Financial forecasts
- Sales information
- Marketing plans
- Changes in top management
- Proposed mergers and acquisitions
- New or lost contracts

Trading in any company's securities using “material, non-public information” may trigger strict sanctions under the United States securities laws. It is also illegal to “tip” others outside of WIS. “Tipping” occurs when you advise others outside WIS when to buy or sell securities based on material, non-public information.

Legal

We respect the diverse cultures, customs, and business practices we encounter in the global marketplace. As an international business our operations are subject to the legal requirements of different countries around the world. Each of us is responsible for understanding and following these laws and regulations as they apply to our jobs. This includes, but is not limited to, competition, inside information, and anti-corruption and anti-bribery laws and regulations. When these laws, local customs, or business practices potentially conflict with applicable laws or the rules set forth in our Code or Company policies, we must seek advice from the Legal department before conforming to them.

WIS is committed to maintaining the highest level of professional and ethical standards in the conduct of our business.

Anti-Bribery and Anti-Corruption (ABC)

We place the greatest importance upon our reputation for honesty, integrity and high ethical standards. WIS prohibits bribery in the conduct of all its business. Bribes can be in many forms or amounts such as payments, goods or services provided “in-kind,” and lavish entertainment and gifts.

We have a fundamental commitment to comply with all applicable laws governing the conduct of our operations worldwide. This commitment includes compliance with Anti-Bribery and Anti-Corruption (ABC) laws such as the United States Foreign Corrupt Practices Act (FCPA) and the United Kingdom’s Bribery Act.

The foundation of ABC law is the prohibition against the payment, or offer of payment, of anything of value to a government official, or any other person, in order to assist in obtaining or retaining business or to secure any improper advantage. This prohibition includes indirectly making the offer or payment through an intermediary on WIS’s behalf, such as an independent sales representative.

Government Officials

The FCPA prohibits corrupt payments to non-US government officials, and it defines government officials broadly. The definition includes:

- Any officer or employee of a government or any department, agency or instrumentality thereof
- Any person acting in an official capacity or on behalf of any such government or governmental department, agency or instrumentality (including government-owned companies, such as national oil companies, or NOC’s)
- Any officer, employee or other person acting for, or on behalf of, a “public international organization” (such as the World Bank, the United Nations, or the Red Cross)
- Any employee of a state-owned company, such as a national oil company

Similarly, the UK Bribery Act also prohibits improper payments to government officials, as well as to any other person even if they are not a government official. In addition, the UK Bribery Act prohibits facilitation payments (payments made to facilitate or secure the performance of a “routine governmental action” by a government official). Facilitation payments are also prohibited by WIS policy. WIS employees must always be in compliance with company policy and all ABC laws, including the FCPA and the UK Bribery Act.



DUE DILIGENCE

Current due diligence must be completed before doing business with an independent sales representative. Make sure all vendors are approved before doing business with them. You should review any new agreements specifically for language which might inadvertently establish an agency relationship. If an invoice or transaction seems unusual speak up and ask questions.

Gifts, Travel, and Hospitality

Gifts, travel and hospitality for government officials are very sensitive areas. Before offering gifts, travel or hospitality of any sort to a government official, take extreme caution to ensure that what you are doing is consistent with our policy and consult with the Corporate Compliance department if you have any questions. Under ABC law, excessive or frequent gifts, travel or hospitality can be considered bribes.

Related Section: Conflict of Interest – Gifts and Hospitality

Independent Sales Representatives

In some circumstances, we hire independent sales representatives in order to conduct our business. In short, we define independent sales representatives as third parties who represent or act on behalf of WIS. Independent sales representatives can be companies or individuals and are often referred to as intermediaries, sponsors or consultants and may also include local partners, joint ventures or consortiums. Any vendor who represents or interacts on behalf of WIS with a non-US government official such as a vendor that provides marketing, customs-clearance, visa processing or other services is considered an independent sales representative.

We expect our independent sales representatives to adhere to the same values of honesty and integrity that we expect from our employees, including the values set forth in this Code of Business Conduct and Ethics. We should conduct proper due diligence coordinated through the Corporate Compliance department before hiring an independent sales representative to ensure any red flags are identified and dealt with accordingly. We have an obligation to continuously monitor the conduct of our independent sales representatives to be reasonably certain that they are upholding our policies against bribery and corruption.

Whenever we hire or do business with an independent sales representative, first consult the Corporate Compliance department to ensure that proper diligence (or “vetting”) has been conducted and is up to date.

Fair Competition

The oil and gas industry is a competitive marketplace and WIS is committed to competing aggressively in this business. We will always deal fairly and honestly with our competitors as well as our customers. Unethical or illegal practices are never an acceptable way for WIS to conduct its business. Taking unfair advantage of a situation is not only wrong, it can be illegal under Anti-trust or Competition law. Generally, these laws prohibit WIS from performing certain activities which harm competition, including:

- Sharing WIS pricing, supplier rates, or other strategic information with our competitors
- Agreeing with competitors to allocate regions or customers, to fix prices or to otherwise limit rig availability to the market
- Sharing misleading or unjustified criticism of a competitor’s services

These laws are strongly enforced to effectively act as a deterrent. There can be severe fines and penalties for the Company as well as liability for those individuals involved, up to and including prison sentences. We must all take precautions to never harm or appear to harm competition in any market in which we operate.

Anti-Trust Statements

If you are a member of a trade organization which has members from our competitors, make sure the organization maintains and enforces its own anti-trust statement. If you have a concern that an agreement or proposed agreement may violate anti-trust laws, ask the Legal Department; anti-trust rules are complex and can vary depending on the jurisdiction.

International Operations

WIS provides services in many parts of the world. Most countries have specific laws and regulations governing the import and export of assets and goods, international trade and immigration. As a global company, WIS is subject to many different regulations in various countries and has a responsibility to understand and comply with these laws and regulations to maintain our ability to operate.

Trade Controls

We must comply with all applicable import and export laws and regulations and be aware of the country of origin of the items being exported and imported, including any restrictions or license requirements. Imports or exports made on behalf of WIS must comply with any applicable trade regulations. Understanding the countries involved directly and indirectly in both the trade of the goods as well as the manufacture, origination and transportation of the goods is imperative, as many countries have rules regulating or limiting trade with other countries.

International trade laws generally impact our operations and our indirect operations through our suppliers. We must be compliant and we must understand our suppliers and how they will provide services, including how the goods will be manufactured and shipped, to ensure they are compliant. Contact Global Supply Chain or the Legal Department for further guidance.

Money Laundering

Money laundering occurs when criminals hide money from criminal activity in legitimate business dealings. WIS takes steps to prevent criminals from using business transactions with WIS to launder illegal funds. Specifically, we will not do business with a known criminal organization or individual, will perform appropriate background checks on those we do business with, and will report suspicious transactions or incidents.



Protecting our Assets

Theft, carelessness and waste directly impact our ability to do business. WIS will not tolerate misuse of our Company assets. Our assets take many forms, including property and equipment, intellectual property, confidential information, information technology and even our people.

We should all endeavor to protect WIS's assets and ensure that we are using them efficiently.

Property and Equipment

Property and equipment are the tools we need to provide services and do our jobs. We will invest in quality assets and continuously improve our efficiency, asset reliability, safety and environmental performance. We are committed to excellence in HSE, operations, communications, teamwork, engineering, personnel and maintenance. Our assets also include computers, mobile phones, desk phones, digital tablets, office supplies, office facilities, operational equipment, spare parts and supplies. These tools should only be used while at work and only for business purposes. In certain approved circumstances, reasonable and appropriate incidental personal use may be permitted, but we should all use discretion when using Company resources for personal activities. Company tools should never be used for unintended or unauthorized purposes.

WIS has procedures governing proper use of property and equipment, including procedures for safe use and for properly safeguarding our assets. These procedures should be followed at all times.

Intellectual Property

Our innovation is essential to our continuing success in the market. This innovation leads to new inventions, discoveries, process improvements, computer programs and other proprietary information. This information is an important asset and must be protected. We should:

- Never disclose the information to others outside WIS, taking special care to not discuss sensitive information in public places or in situations where we may be overheard
- Never use this information for personal benefit
- Obtain approval before discussing trade secrets in speeches, technical papers and WIS publications

All proprietary information we create while working at WIS is and remains the property of WIS even after employees leave the Company.



Information Security

Today, much of our confidential and proprietary information is stored in our IT system. To protect this information, WIS uses certain IT controls and procedures in how we manage our people, business processes and technology, such as passwords, encryption and other access controls. WIS will ensure that the controls remain up-to-date and capable of preventing intentional or unintentional breaches in our information security. To avoid unintended consequences and jeopardize our security, do not circumvent, alter or remove IT controls without proper approval.

Although limited use of WIS IT and telecommunication facilities for personal use is currently generally acceptable, the use of these facilities, including your personal use, is logged and monitored.

You should apply high ethical standards, comply with applicable laws and regulations, and ensure you meet WIS's security requirements when using WIS IT and telecommunications facilities. Your personal use of WIS's IT and telecommunications facilities should not incur more than a nominal cost or negatively affect productivity. Improper use of these facilities could be illegal and could damage WIS. WIS may report illegal use to the proper authorities.

IT System Controls

WIS's controls ensure that:

- We can protect the confidentiality, integrity and availability of important information and IT assets
- Only authorized users are able to access our computers and network services such as the internet, email applications and network file directories
- Authorized users can only access the IT assets/systems they need to fulfill their job responsibilities
- Access to WIS's IT assets/systems can be monitored to prevent misuse of an asset, or unauthorized access to it
- We comply with all applicable legal, regulatory and contractual requirements relevant to keeping our information and IT assets/systems secure
- Terminated employees must return all WIS equipment, including computer and other IT assets



Information Security Guidelines

Information Security can be maintained by following these guidelines:

- Information stored on a WIS computer or a WIS mobile device is the property of WIS, even if the information is personal in nature
- Keep computer equipment safe and secure at all times. This includes laptops, mobile devices and storage devices. This particularly applies when you are working away from WIS premises, for example at home or in a hotel
- Check with your supervisor and IT before embarking on international business travel to ensure necessary precautions are observed to protect WIS's property
- Protect your user IDs and passwords. Make sure your passwords are difficult to guess and change them regularly. Never share your passwords or personal identification numbers (PINs), or allow anyone else to use your user account
- Ensure your personal use of WIS IT and telecommunication facilities is occasional and brief
- Do not use the WIS network or data storage space on the network for entertainment purposes or to store your personal data
- Remain in control of the IT and telecommunication facilities you are responsible for if others use them
- Do not upload, download, send or view pornography or other indecent or objectionable material or material that is illegal or which could cause offense, anxiety, inconvenience or annoyance to your colleagues
- Use WIS security measures
- Ensure you comply with the Communications and Workplace Conduct requirements as laid out in this Code
- Get authorization before installing software or connecting hardware
- Do not use WIS IT or telecommunication facilities for unlawful or immoral activities or purposes (including the violation of IP rights or the commission of a cybercrime), or to gamble, or to conduct your own business activities
- Report incidents immediately. If you suspect an incident has happened or is about to happen (e.g. suspected virus, suspicious phone call, lost laptop/mobile device or information), contact the WIS IT Helpdesk

Challenge Yourself

- Can you explain and justify your personal use?
- Have you uploaded, downloaded or transmitted objectionable material?
- Did you receive approval to install software?



Protect Your Information

Protect your user IDs and passwords. Make sure your passwords are difficult to guess and change them regularly. Never share your passwords or personal identification numbers (PINs), or allow anyone else to use your user account



Financial Accountability

We adhere to a conservative financial policy and disciplined operational mind-set to understand and manage financial and operational risk and deliver shareholder value.

Financial

Financial Accounting and Reporting

WIS must record and prepare timely financial information accurately and honestly. This includes the information management uses internally for decision making purposes, historical information we report publicly in our financial statements or press releases, and other forward-looking information we share with the public and our investors. We all contribute to maintaining accurate books and records in our day-to-day activities by maintaining open channels of communication across the organization, completing tasks such as preparing expense reports and time sheets, submitting detailed AFE's, and highlighting and addressing issues or concerns as they arise.

Fair and accurate books and records are essential to properly managing our company. WIS maintains a system of internal controls designed to ensure that our records are accurate and our assets are safeguarded from risk of fraud. We must never knowingly circumvent these controls by bypassing or working around them. We should work to improve our existing processes if we feel that our existing controls do not adequately prevent fraud, waste or inaccurate records.

WIS will maintain our books and records in a manner consistent with all applicable laws, regulations, and accounting requirements. If required, WIS will take the necessary steps to plan for and comply with all new accounting standards and statutory laws within the required deadlines.

Disclosure

All public communication made by WIS, such as periodic reports, press releases, and other filings with regulatory authorities must be timely, understandable, fair, complete, accurate and thoroughly reviewed by the appropriate personnel who have the authority to approve the communication. We must never knowingly misrepresent, omit or cause others to omit material facts from our public disclosures. We are committed to the accuracy and truthfulness of all reports that we present to the public.

In addition to our own employees, others, such as our internal and external auditors, help ensure that our disclosures are fair and accurate. We must never directly or indirectly induce, coerce, manipulate, or mislead our accounting team or our auditors.

Inaccurate public reports can damage our reputation and our ability to conduct business in the future. Disclosures to the public must have the approval of the CEO or the CEO's delegate.

Related Section: Marketing and Communications

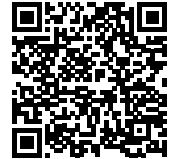
INTEGRITY IN ACCOUNTING & REPORTING

1. We all play an important role in the integrity and quality of our financial accounting and reporting processes. Open and collaborative communication across functional areas is critical to ensure our books and records are accurate, complete, and fairly presented.
2. If you feel that any of our books, records, or public disclosures contain errors, misrepresentations or false statements, alert your supervisor, the Legal Department, or the Chief Financial Officer; you may also report your concerns through the WIS Ethics Hotline.
3. Don't take shortcuts around financial controls. These controls are designed to protect you and WIS and to prevent errors, both intentional and accidental.

Reporting Issues and Concerns

Reporting Obligations

We are fully committed to operating our business with honesty and integrity. We all share this responsibility. If you are aware of any potentially illegal or unethical business conduct, including potential violations of the Code or Company policy, you are obligated to report it. You can report such concerns to your supervisor, to any senior manager in the Company, to a Human Resources representative, to the Legal or Corporate Compliance departments, call the WIS Ethics Hotline directly, or report through the WIS Ethics website by scanning the QR code to the right. Information about the website and hotline are included below.



The Ethics Website and Hotline Can Be Trusted

The website and hotline are managed by a third-party operators that are trained specifically to take your report. Your report is forwarded to the Legal Department of WIS. After a report is made, you will be provided with a unique code that you can use to provide additional information or check on the status of your report.

Anonymous Reporting

When calling or submitting online, you can choose to make your report anonymously. When making a report it is not required that you provide your name or any other personal information.

Other Than English Capability

If English is not your first language, the hotline call operators will have a person available to communicate in your native language. It is important to be patient during this process as it may take a few moments to bring the person on the line.

Information Access

To access the most up-to-date information, please visit the **Legal portal** on JARVIS or the **WIS Ethics website**.



www.wellboreintegrity.ethicspoint.com



**WIS Ethics Hotline Number:
1-844-996-0274**



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**THOMAS
TOOLS**