



## WIS SUPPLIER CODE OF CONDUCT

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### I. PURPOSE

The purpose of this Supplier Code of Conduct ("Code") is to ensure that all suppliers conducting business with Wellbore Integrity Solutions ("WIS") share our values and adhere to high standards of ethics, safety, legal compliance, and environmental and social responsibility. WIS seeks to promote a responsible and sustainable supply chain, aligned with our corporate principles.

WIS expects all suppliers to meet the standards set forth below. *By supplying WIS with goods or services, suppliers represent that they are in compliance with these standards and that they have not violated and will not violate any law in connection with the supply of goods and services to others.*

### I. DEFINITIONS

- **Supplier:** Any individual, corporation, or other legal entity providing goods or services to WIS.
- **Material Value:** Any item, service, or benefit with monetary or non-monetary value that could influence decision-making.
- **Coercion:** The practice of compelling an individual to act against their will by using threats, force, or undue pressure.
- **PII (Personally Identifiable Information):** Data that can identify an individual, such as names, addresses, or identification numbers.

### II. ETHICS & COMPLIANCE

- A. **Legal Compliance.** Suppliers must operate in full compliance with all applicable laws and regulations in the jurisdictions where they operate or supply goods/services to WIS. This includes, but is not limited to, laws related to labor, health and safety, human rights, trade, environmental protection, and anti-corruption.

Suppliers must have systems in place to remain informed of and compliant with all applicable legal requirements.

- B. **Anti-Corruption and Bribery.** WIS maintains zero tolerance for bribery and corruption. Suppliers must comply with all applicable anti-corruption laws, including the US Foreign Corrupt



Practices Act and the UK Bribery Act. Suppliers shall not offer, promise, or accept any bribes or improper payments in connection with business dealings with WIS or third parties.

- C. **Data Privacy and Confidentiality.** Suppliers must take reasonable precautions to safeguard all confidential and personal data shared by WIS. Compliance with laws such as the Uniform Trade Secrets Act and the European Union's General Data Protection Regulation (GDPR), where applicable, is required. Suppliers must also implement data breach protocols and notify WIS immediately in the event of any unauthorized disclosure.
- D. **Quality.** Suppliers are expected to deliver goods and services that meet or exceed industry standards and contractual obligations. Deliverables must consistently perform as warranted and be safe for intended use.
- E. **Responsible Sourcing of Materials.** Suppliers sourcing from conflict-affected or high-risk areas must avoid contributing to armed conflict, terrorism, or human rights violations. Suppliers should follow the OECD Due Diligence Guidance for Responsible Supply Chains. Materials derived from protected wildlife or plants must be sourced legally and in accordance with conventions like the CITES treaty.
- F. **Fair Competition.** Suppliers shall not engage in anti-competitive behavior such as price-fixing, bid rigging, or market sharing. Suppliers may not offer inducements or confidential information to or from WIS employees and must conduct all transactions on strictly commercial terms.
- G. **Trade Compliance and Conflict Minerals.** Suppliers must comply with all applicable import, export, customs, and trade compliance laws and regulations. This includes proper classification, labeling, and documentation of goods, as well as adherence to embargoes and sanctions.

Suppliers are also expected to take steps to ensure that their products do not contain conflict minerals (tin, tantalum, tungsten, and gold) that finance or benefit armed groups in the Democratic Republic of the Congo or adjoining countries. Suppliers should adopt policies and procedures aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals.

### III. HEALTH, SAFETY, & ENVIRONMENTAL

- A. **Health and Safety.** Suppliers must provide a safe and healthy working environment and comply with all applicable health and safety regulations. Regular risk assessments and implementation of safety controls are required. WIS encourages suppliers to adopt industry best practices and provide health and safety training to their workers.



**B. Environmental Stewardship.** Suppliers are expected to comply with all environmental laws and regulations related to emissions, hazardous materials, waste, and water. Suppliers should:

- Set and track environmental performance goals.
- Reduce waste through recycling, source reduction, and composting.
- Conserve water and energy.

WIS encourages our suppliers to reduce their impact on the environment and climate and to protect the natural resources we all depend on, especially through reasonable efforts to reduce or eliminate waste of all types, including through source reduction, recycling, composting, and conserving water and energy. Annual environmental performance reports may be requested by WIS from high-risk or high-volume suppliers.

#### **IV. WORKPLACE & LABOR**

**A. Respect and Dignity.** Suppliers must provide a workplace free from harassment, discrimination, intimidation, or abuse. Respect for all workers is required regardless of race, gender, age, religion, or sexual orientation. Training on harassment prevention and diversity should be provided.

**B. Wages and Benefits.** Suppliers must pay wages and benefits in accordance with legal requirements, including overtime compensation. Accurate payroll records must be maintained, and no illegal deductions may be made.

**C. Employment Eligibility and Voluntary Employment.** WIS honors labor laws and does not tolerate any supplier utilizing prohibited child labor, forced labor, or any form of coercion, physical punishment, or abuse of workers. Suppliers should only hire workers with a legal right to work, and they are responsible for verifying and documenting their employees' work eligibility. Further, suppliers shall not use any practice to coerce the continued employment of any person, such as the practice of requiring employees to pay recruitment commissions or the withholding of travel documents. Suppliers must not use child labor, forced labor, or any form of coerced labor. Workers must be free to terminate employment without penalty. Practices such as withholding travel documents or requiring recruitment fees are strictly prohibited. Verification of employment eligibility is required.

**D. Freedom of Association.** Suppliers must respect workers' rights to freely associate, organize, and bargain collectively in accordance with applicable laws.



**E. Inclusion of Minority, Woman, and Veteran-Owned Businesses.** WIS values diversity and encourages suppliers to support economic inclusion. Suppliers should actively promote and engage with minority-owned, woman-owned, veteran-owned, and other diverse businesses within their supply chains. WIS may request information from suppliers about their efforts to foster inclusivity and their use of diverse business partners.

**F. Human Trafficking and Modern Slavery.** In compliance with the UK Modern Slavery Act and other similar legislation in the jurisdictions in which WIS conducts business, other emerging legal requirements, and ethical industry norms, Suppliers of WIS must comply with all applicable labor laws in all WIS operations and endeavors to promote the health and safety of all workers. Suppliers must comply with US laws applicable to labor trafficking, including the Uyghur Forced Labor Prevention Act (UFLPA), and the requirements of US Customs Law 19 U.S.C. 1307 prohibiting the import of goods made with forced labor anywhere in WIS' supply chain. These laws essentially impose an obligation of supply chain due diligence on US importers. The UFLPA establishes a rebuttable presumption that any goods made wholly or in part in the Xinjiang region of China were made with forced labor.

WIS does not engage in, tolerate, or condone any use of prohibited child labor, forced labor, indentured labor, or any form of coercion, physical punishment, or abuse of workers. In addition, we expect our suppliers to uphold these same standards, and WIS will not knowingly conduct business with any supplier who violates these standards.

#### **IV. ENVIRONMENTAL, SOCIAL, & GOVERNANCE (ESG).**

**A.** WIS encourages suppliers to adopt robust ESG practices to ensure long-term sustainability and ethical business operations. Suppliers should:

- Establish ESG goals and incorporate them into their business strategy.
- Publish ESG metrics or reports where feasible.
- Conduct operations in a manner that promotes climate action, inclusion, and transparent governance.
- Promote diversity, equity, and inclusion across all levels of their workforce.
- Implement strong ethical standards, including whistleblower protections and clear governance structures.

WIS may request ESG disclosures or scorecards from suppliers as part of ongoing evaluations.



## V. MONITORING, REPORTING, & COMPLIANCE

- A. **Supplier Responsibilities.** Suppliers are responsible for ensuring this Code is understood and followed through their operations, including among subcontractors involved with WIS business.
- B. **Audits and Assessments.** WIS reserves the right to conduct audits or assessments, announced or unannounced, to verify compliance. Suppliers are expected to cooperate fully.
- C. **Reporting Violations.** Suppliers are required to promptly report any actual or suspected violations of this Code to their primary WIS contact or through an anonymous reporting platform if available.
- D. **Consequences of Non-Compliance.** WIS may cancel outstanding contracts, suspend future business, or terminate its relationship with any supplier found in material violation of this Code. "Material violation" includes repeated or willful disregard of any provision herein.

Suppliers are responsible for ensuring that the requirements of this Code are understood and followed throughout their organization. Suppliers are also responsible for ensuring that any of their approved subcontractors involved in providing goods or services to WIS understand and comply with this Code. Suppliers are expected to self-monitor in line with this Code.

WIS expects suppliers to provide to their WIS contacts notice of any failures to meet the standards set forth in this Code so that, if possible, WIS can work with you to remedy or rectify the issue.

Although WIS desires to work with its suppliers towards continuous improvements in the processes by which goods and services are produced and delivered to WIS,

**WIS RESERVES THE RIGHT TO CANCEL OUTSTANDING CONTRACTS, SUSPEND FUTURE CONTRACTS, OR TERMINATE OUR RELATIONSHIP WITH ANY SUPPLIER IN MATERIAL VIOLATION OF THIS CODE, NOTWITHSTANDING ANY TERMS TO THE CONTRARY IN ANY CONTRACT BETWEEN WIS AND THE SUPPLIER, AND REGARDLESS OF WHETHER THE VIOLATIONS OF THIS CODE BY THE SUPPLIER AFFECT THE SUPPLIER'S DELIVERY OF GOODS OR SERVICES TO WIS. THE FAILURE OR OMISSION BY WIS TO INSIST UPON STRICT PERFORMANCE AND COMPLIANCE WITH ANY OF THE PROVISIONS OF THIS CODE AT ANY TIME SHALL IN NO WAY CONSTITUTE A WAIVER OF ITS RIGHTS**



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**Acknowledgment to WIS Supplier Code of Conduct**

By supplying goods or services to WIS, the supplier acknowledges that they have read, understood, and agree to comply with the terms of this Supplier Code of Conduct.

Supplier Representative Name \_\_\_\_\_

Date \_\_\_\_\_

Signature \_\_\_\_\_

Please return this portion to the WIS Supply Chain group.