

# Supplier Code of Conduct

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#### **In This Policy**

- we, us, our, Company and Precision mean Precision Drilling Corporation and its subsidiaries and affiliates
- you, your, they, their and Suppliers mean Precision's suppliers, vendors and contractors
- Policy and Code mean this Supplier Code of Conduct Policy

#### **About This Policy**

At Precision, we are committed to conducting business responsibly, ethically, and sustainably. Our Suppliers play a critical role in helping us achieve these objectives. This Policy outlines the minimum standards and expectations for all suppliers, vendors, contractors, and partners working with Precision.

By adhering to this Code, Suppliers agree to align their operations with our values, including environmental stewardship, social responsibility, and sound governance.

# What We Expect

We expect Suppliers to uphold the principles outlined in this Code and to operate with the highest standards of business integrity, including, at a minimum:

- complying with all applicable laws and regulations;
- understanding and adhering to our Code;
- communicating and enforcing our Code provisions throughout your organization and across your supply chain, including your sub-vendors and sub-contractors;
- demonstrating honesty and accountability in your actions;
- acting in our best interests; and
- protecting our assets.

A Supplier's ability to meet or exceed the standards set forth in this Code is a key factor in our procurement decisions. We expect all Suppliers to comply with these requirements, even if the Code is not formally incorporated into a specific contract. Additionally, this Code does not limit our ability to impose additional social, environmental, ethical, privacy, or cybersecurity requirements in procurement contracts to address specific risks associated with a given agreement.

#### Scope

The Code applies to all Suppliers engaged in providing goods and/or services to the Company.

# **Legal and Regulatory Compliance**

Suppliers must comply with all applicable local, national, and international laws, regulations, and industry standards that apply to them, including but not limited to:

- anti-bribery and anti-corruption laws;
- labor laws, including wage and working hours regulations;
- Corporate Transparency Act;
- health, safety, and environmental laws and regulations;
- antitrust and fair competition laws that govern the jurisdictions in which you do business;
- trade control laws that apply to Precision's operations; and
- insider trading.

# **Environmental Responsibility**

Suppliers are expected to consider the environmental impact of their operations and products and comply with all applicable laws and regulations in their operating jurisdictions.

#### **Human Rights and Labor Practices**

Suppliers must uphold internationally recognized human rights and ensure fair labor practices, including, but not limited to:

- prohibiting forced labor, child labor, and human trafficking;
- providing safe, healthy, and inclusive working conditions;
- respecting workers' rights to freedom of association and collective bargaining; and
- ensuring fair wages and equitable treatment without discrimination based on race, gender, religion, nationality, or other protected characteristics.

### Health, Safety, and Well-Being

Suppliers must prioritize the health, safety, and well-being of their employees and contractors by:

- implementing and maintaining health and safety management systems;
- providing appropriate training, equipment, and support to prevent workplace injuries; and
- reporting and addressing health and safety incidents transparently.

#### **Ethical Business Practices**

Suppliers are required to conduct business with the highest ethical standards, including:

- zero tolerance for corruption, bribery, or fraud in any form;
- ensuring transparency in financial transactions and reporting;
- avoiding conflicts of interest in all business dealings; and
- respecting Precision's intellectual property rights and confidentiality agreements.

#### **Supply Chain Management**

Suppliers are responsible for ensuring their own supply chain's meet the standards outlined in this Code. This includes:

- extending this code of conduct to subcontractors and ensuring compliance; and
- monitoring, auditing, and addressing risks related to human rights, environmental impact, and ethical business practices.

#### **Reporting and Accountability**

Suppliers must maintain transparent reporting mechanisms to demonstrate compliance with this Code. This includes our expectations that the Supplier:

- actively oversees its supply chain to ensure adherence to all applicable laws and enforces policies and procedures that enable the reporting of misconduct or violations without the risk of retaliation;
- is responsible for ensuring that all subcontractors and sub-suppliers, regardless of tier, comply with the provisions of this Code;

- maintains accurate, comprehensive, and transparent records, books and accounts to verify compliance with applicable laws and this Code. This includes:
  - providing data and documentation related to environmental, social, and governance performance upon request;
  - o allowing audits by Precision or third parties to verify compliance; and
  - o promptly addressing any non-compliance issues and implementing corrective actions.

## **Reporting a Concern**

You have a responsibility to report violations of this Code, as well as any breaches of the law or applicable rules and regulations governing the goods or services you provide to Precision.

If you or your representative have a question about a situation or need to report a problem or concern, You are encouraged to work with your primary contact at Precision to determine the best route to resolve your concern. However, Precision recognizes that there may be times when this is not possible or appropriate. In such instances, you or your representative can report concerns through one of the following channels:

• Our anonymous whistleblower line – PD *EthicsLine*:

**Internet:** <u>www.pdcethicsline.com</u>

By Phone:

Canada and United States: 1-866-570-6002

Kuwait: 965-2206-9141Saudi Arabia: 800-850-0307

- UAE: 800-0320635

Send an email to our Compliance Department at <a href="mailto:compliance@precisiondrilling.com">compliance@precisiondrilling.com</a>

Each of our channels of communication are designed to ensure that reports are handled in a confidential manner, and where permitted by law, anonymous for submitting violations of this Code. There will be no retaliation if you make a report in good faith.

This Code is available on Precision's website.

### **Violations of the Code**

Precision reserves the right to terminate agreements with Suppliers found to be in violation of this Code if corrective actions are not implemented within an agreed timeframe. Precision may, in its sole discretion, revise this Code. It is the supplier's responsibility to comply with the most current version of this Code.

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