

# Vendor Guidelines

## Overview

Nabors' Vendor Guidelines have been developed to clarify Nabors global expectations of its vendors and suppliers. Nabors' guidelines are intended to complement Nabors' [Code of Business Conduct](#) and the Company's other policies and procedures referenced therein. This commitment extends to Nabors dealings with all its vendors, suppliers and their subcontractors.

Nabors is committed to ethical and lawful behavior and seeks to maintain high ethical standards and to comply with all applicable laws and regulations. Any vendor engaged in providing product or services to Nabors is expected to act in accordance with the Vendor Guidelines, communicating and implementing the guideline requirements throughout its organization and its supply chain.

## Scope and Applicability

We expect integrity from our employees, our stakeholders and our vendors in all we do. We have a [Code of Business Conduct](#) for new and existing employees describing the policies, procedures and principles they must follow. Likewise, these guidelines incorporate the principles of lawful and ethical conduct Nabors expects of its vendors, any of their subcontractors and their staff. Nabors expects its vendors to have their own code of conduct addressing business conduct and practices.

Nabors reserves the right to carry out annual audits with suppliers, evaluating their performance in the areas of human rights, environmental management, business ethics and social responsibility as outlined in these guidelines and aligned with our [Health, Safety and Environmental Management System \(HSE MS\)](#).

Nabors expects its vendors and their subcontractors to comply with all applicable laws, rules, regulations and standards within the countries in which they operate.

## **Ethics:**

### **Business and Financial Records**

Nabors expects vendors to provide honest, accurate and itemized invoices inclusive of Nabors PO number (where applicable). Such invoices shall be supported by proper documentation and comply with all other requirements as set out in the applicable agreement(s). Invoices will not be split to circumvent approval requirements.

### **Anti-Corruption**

Nabors does not tolerate any form of bribery or corruption and requires its vendors to take the same approach, including but not limited to, compliance with the U.S. Foreign Corrupt Practices Act, UK Bribery Act and other applicable anti-bribery laws. Vendors shall not directly or indirectly offer, allow, give or accept anything of value on behalf of Nabors or a Nabors employee in order to gain an improper advantage

Vendors are required to answer honestly and comply with terms set forth in Section 5 of Nabors' Supplier Survey, a copy of which is provided to each vendor.

### **Anti-Tax Evasion and Anti-Facilitation of Tax Evasion**

Nabors does not tolerate its vendors committing or facilitating unlawful tax evasion. We expect our vendors to ensure the same of their subcontractors by adopting policies and procedures preventing such conduct.

### **Antitrust/Fair Business Practices**

Vendors must comply with antitrust laws – known globally as “competition laws.” Further, vendors must abide by fair business practices, including truthful and accurate advertising.

### **Gifts and Entertainment**

Vendors shall not directly or indirectly engage a Nabors employee during any vendor selection or re-selection process as this has the potential to give others the impression of favoritism or improper

advantage. Furthermore, vendors shall not give or offer gifts or entertainment that might compromise, or appear to compromise, an employee's judgment or independence.

## Mechanism for Reporting Concerns

Suppliers, their employees and their subcontractors, who believe that an employee of Nabors has engaged in illegal or otherwise improper conduct, shall report the matter to the Company. Any concerns inclusive of, but not limited to, violations surrounding human rights, environmental management, business ethics or social responsibility shall be reported promptly to Nabors.

If ethical concerns arise, individuals can contact a Nabors manager, a representative of the HR or Law Departments, or an internal or independent auditor. In addition, individuals may choose to provide information in confidence by calling the Nabors Hotline at 1-877-NABORS7.

Nabors prohibits retaliation against any person reporting such a concern in good faith.

### Labor:

Nabors is committed to respecting the basic rights of the people with whom we work and avoiding engagement in any activity that encourages or solicits the abuse of another's human rights as detailed within our [Corporate Guidelines on Human Rights](#).

We expect our suppliers and vendors to adopt similar policies within their own operations that apply to all employees and suppliers.

## Fair Treatment and Anti-discrimination

Nabors values diversity and inclusion. We believe these two elements are vital for our ability to grow and be innovative. As an equal opportunity employer, decisions are made without regard to race, color, religion, national origin, ethnicity, sex, sexual orientation gender identify or expression, age, disability, protected veteran status or any other characteristics protected by law. We expect the same values of diversity and inclusion to be upheld by our vendors and their subcontractors.

## Work Hours, Wages and Benefits

Nabors expect our vendors to offer fair compensation relative to the industry and local labor market and work to ensure full compliance with applicable wage, work hours, overtime and benefits laws.

## Forced Labor and Human Trafficking

Nabors does not tolerate any use of forced labor or human trafficking and expect the same of our vendors and their subcontractors. No vendor shall use any form of forced labor or human trafficking.

## Child Labor

As a global employer, Nabors ensures our employees meet the applicable working age requirement and prohibits the use of child labor. We expect that our vendors will commit to not use child labor and will ensure their employees and their subcontractor's employees are of applicable working age.

## Human Rights Compliance

Nabors provides access to policies and guidelines referenced in these vendor guidelines to vendors and expects its vendors comply with the same. Nabors' Corporate Guidelines on Human Rights are aligned with our [Code of Business Conduct](#). This policy, including translations and related information, can be found via the Company's internet site: <https://www.nabors.com/nabors/policies>.

Nabors vendors are expected to (and shall ensure that each of their subcontractors shall) comply with all applicable human rights laws, statutes, regulations and codes from time to time, including but not limited to the [United Nations Universal Declaration of Human Rights](#) and the [International Labour Organization Declaration on Fundamental Principles and Rights at Work](#). Vendors shall implement due diligence procedures for their own suppliers, subcontractors and other participants in their supply chains, to ensure that there are no human rights violations, including but not limited to slavery, child labor or human trafficking in their supply chain. Vendors shall notify Nabors as soon as they become aware of any breach, or potential breach, of human rights in their business or supply chain.

## Protection of Workers

Nabors is committed to the safety of our employees worldwide. Our approach focuses on providing a safe, healthy and drug-free work environment at all our locations. This is how we prevent health, safety, and environmental hazards that could adversely affect the employees, the customers, or the public.

Nabors expects our vendors and their subcontractors to provide a safe, healthy and drug-free work environment, and to be environmentally responsible, to avoid adverse impacts of operations on the environment.

## Conservation

Vendors are encouraged to conserve natural resources, by reducing their use and recycling when possible. In addition, vendors shall avoid use of hazardous materials where possible.

## Environmental Compliance

Vendors shall comply with all applicable environmental laws and regulations.

## Waste Management

Nabors vendors and their subcontractors are encouraged to have systems in place to ensure that any waste, especially hazardous waste, is managed in a responsible manner.

## Processes, Emergency Preparedness and Response

Vendors shall have appropriate processes in place to identify, prevent and mitigate any risk of a chemical spill or other event that would pose a threat to worker safety and/or to the environment. These processes include emergency plans and response procedures in the case of an unsafe event.

## Management Oversight:

Vendors are expected to adopt management systems in furtherance of these guidelines to:

- Identify and comply with all applicable laws and regulations in the countries where they operate.
- Assess and manage risks in all areas addressed in these guidelines.
- Maintain documentation to show compliance with these guidelines and relevant laws and regulations.
- Communicate the expectations of these guidelines and provide effective training to workers.
- Ensure continual improvement in processes.
- Allocate appropriate resources to the ensure compliance with these guidelines.

## Diversity in Nabors Supply Chain

Nabors Procurement and Supply Chain is committed to the development and support of a diverse supplier base. We ensure that all vendors, regardless of their size, geography or workplace nationalities, have the same opportunities to compete for the supply of goods and services. We expect the same from our vendors and their subcontractors.