

Vendor Guidelines

Overview

Nabors' Vendor Guidelines clearly articulate our global expectations from vendors and suppliers. These guidelines are designed to complement [Nabors' Code of Business Conduct](#) and other referenced policies and procedures. This commitment is applicable to all interactions with vendors, suppliers, and their subcontractors.

Nabors is steadfast in its commitment to ethical and lawful conduct, striving to uphold elevated ethical standards and comply with all relevant laws and regulations. Vendors providing products or services to Nabors are anticipated to adhere to the Vendor Guidelines. It is expected that vendors will effectively communicate and implement these guidelines throughout their organization and supply chain.

Scope and Applicability

We place a paramount emphasis on integrity from our employees, stakeholders, and vendors in every facet of our operations. Our [Code of Business Conduct](#), applicable to both new and existing employees, delineates the policies, procedures, and principles that must govern their actions. These guidelines encompass the lawful and ethical standards that Nabors anticipates from its vendors, their subcontractors, and respective staff members.

Nabors holds the expectation that vendors maintain their own code of conduct, specifically addressing business conduct and practices. We retain the prerogative to conduct annual audits with suppliers, evaluating their performance in key areas such as human rights, environmental management, business ethics, and social responsibility. This assessment aligns with our [Health, Safety, and Environmental Management System \(HSE MS\)](#).

Moreover, Nabors requires vendors and their subcontractors to adhere rigorously to all applicable laws, rules, regulations, and standards within the countries in which they operate. This commitment underscores our dedication to promoting responsible and compliant business practices throughout our supply chain.

Business and Financial Records

Nabors maintains the expectation that vendors submit transparent, precise, and detailed invoices that include the relevant Nabors Purchase Order (PO) number where applicable. These invoices should be substantiated by appropriate documentation and adhere to all stipulated requirements outlined in the relevant agreement(s). It is imperative that invoices are not artificially divided to evade approval requirements. This adherence to invoicing standards ensures accuracy, transparency, and compliance with our established protocols.

Anti-Corruption

Nabors upholds a zero-tolerance stance towards any manifestation of bribery or corruption and mandates that its vendors adopt a similar commitment. This includes, but is not limited to, compliance with prominent anti-bribery legislation such as the U.S. Foreign Corrupt Practices Act, UK Bribery Act, and other relevant statutes. Vendors are expressly prohibited from engaging in any direct or indirect offering, allowance, giving, or acceptance of anything of value on behalf of Nabors or any Nabors employee for the purpose of obtaining an improper advantage.

Furthermore, vendors are obligated to respond truthfully and adhere to the terms delineated in Section 5 of Nabors' Supplier Survey, a copy of which is provided to each vendor. This ensures a comprehensive understanding and compliance with the anti-bribery measures integral to our operational framework.

Anti-Tax Evasion and Anti-Facilitation of Tax Evasion

Nabors unequivocally disapproves of any involvement by its vendors in unlawful tax evasion or facilitation thereof. We hold the firm expectation that our vendors actively ensure compliance with this principle among their subcontractors. This involves the implementation of robust policies and procedures aimed at preventing any engagement in such conduct. This collective commitment to ethical business practices underscores our dedication to upholding legal standards and fostering a culture of integrity within our vendor relationships.

Antitrust and Fair Business Practices

Vendors engaged with Nabors are required to adhere strictly to antitrust laws, commonly recognized as "competition laws" on a global scale. In addition to compliance with these laws, vendors are obligated to conduct their business in accordance with fair practices. This encompasses the provision of truthful and accurate advertising. By ensuring adherence to antitrust regulations and promoting fairness in business practices, vendors contribute to the maintenance of a competitive and ethical marketplace, aligning with Nabors' commitment to integrity and lawful conduct.

Gifts and Entertainment

Vendors are expressly prohibited from engaging in direct or indirect interactions with Nabors employees during any vendor selection or re-selection process. This prohibition is in place to mitigate the risk of creating an impression of favoritism or an improper advantage. Additionally, vendors are strictly forbidden from providing or offering gifts or entertainment that could compromise, or give the appearance of compromising, the judgment or independence of Nabors employees. These guidelines are in place to uphold the highest standards of fairness, transparency, and ethical conduct in all vendor interactions with Nabors personnel.

Mechanism for Reporting Concerns

Suppliers, their employees, and subcontractors are encouraged to report any instances where they believe an employee of Nabors has engaged in illegal or otherwise improper conduct. This includes, but is not limited to, concerns related to human rights, environmental management, business ethics, or social responsibility. Prompt reporting of such concerns to Nabors is essential.

In the event of ethical concerns, individuals have multiple avenues for reporting, including contacting a Nabors manager, a representative from the HR or Law Departments, or an internal or independent auditor. For those who prefer confidentiality, information can be provided through the Nabors Hotline at 1-877-NABORS7. It is important to note that Nabors strictly prohibits any form of retaliation against individuals reporting such concerns in good faith. This commitment underscores our dedication to fostering an environment where ethical concerns can be addressed openly and without fear of reprisal.

Labor

Nabors maintains a steadfast commitment to upholding the fundamental rights of individuals with whom we collaborate, and we steadfastly abstain from participating in any activities that promote or solicit the abuse of another's human rights, as outlined in our [Corporate Guidelines on Human Rights](#).

We extend this commitment to our suppliers and vendors, expecting them to institute analogous policies within their own operations. These policies should be comprehensive, applicable to all employees and suppliers, and aligned with the principles articulated in our Corporate Guidelines on Human Rights. By setting these expectations, we seek to create a collective environment that values and safeguards human rights throughout our operations and supply chain.

Fair Treatment and Anti-Discrimination

Nabors places a high regard on diversity and inclusion, recognizing them as essential elements for our organizational growth and innovation. As an equal opportunity employer, decisions within our company are made without discrimination based on race, color, religion, national origin, ethnicity, sex, sexual orientation, gender identity or expression, age, disability, protected veteran status, or any other characteristics protected by law.

We hold the expectation that our values of diversity and inclusion are similarly embraced and upheld by our vendors and their subcontractors. This commitment extends to fostering an inclusive and diverse environment across our entire supply chain, aligning with our broader organizational principles, and promoting a culture of equality.

Work Hours, Wages and Benefits

Nabors expects vendors to provide fair compensation that aligns with industry standards and reflects the prevailing conditions in the local labor market. This entails a commitment to ensuring full compliance with relevant laws governing wages, work hours, overtime, and benefits. By adhering to these standards, vendors contribute to the establishment of

equitable and lawful employment practices, fostering a working environment that prioritizes fair compensation and compliance with applicable regulations.

Forced Labor and Human Trafficking

Nabors unequivocally condemns the use of forced labor or human trafficking and requires a parallel commitment from our vendors and their subcontractors. It is explicitly stated that no vendor associated with Nabors shall engage in any form of forced labor or human trafficking. This stringent stance underscores our dedication to ethical and responsible business practices, and we anticipate a shared commitment to upholding human rights and dignity throughout our supply chain.

Child Labor

As a global employer, Nabors rigorously adheres to applicable working age requirements and categorically prohibits the use of child labor. In alignment with these principles, we anticipate a corresponding commitment from our vendors to abstain from employing child labor. Furthermore, we expect vendors to ensure that their employees and the employees of their subcontractors conform to the applicable working age regulations. This mutual commitment reinforces our dedication to ethical employment practices and the protection of the rights of young individuals in the workforce.

Human Rights Compliance

Nabors extends access to policies and guidelines referenced in these vendor guidelines to its vendors, with the expectation that vendors adhere to the same standards. The Corporate Guidelines on Human Rights at Nabors align with our overarching [Code of Business Conduct](#), and these resources, along with translations and relevant information, are accessible on the company's website: <https://www.nabors.com/nabors/policies>.

Vendors engaged with Nabors are required to ensure, and affirm that their subcontractors likewise ensure, compliance with all applicable human rights laws, statutes, regulations, and codes, including but not limited to the [United Nations Universal Declaration of Human Rights](#) and the [International Labor Organization Declaration on Fundamental Principles and Rights at Work](#). Vendors are obligated to institute due diligence procedures for their suppliers, subcontractors, and other entities within their supply chains to prevent human rights violations, such as slavery, child labor, or human trafficking.

In the event of any actual or potential breaches of human rights within their business or supply chain, vendors are expected to promptly notify Nabors. This proactive communication is vital to maintaining the commitment to ethical business practices and human rights standards throughout the supply chain.

Protection of Workers

Nabors is unwavering in its commitment to ensuring the safety of our employees globally. Our strategy revolves around establishing a work environment that is safe, healthy, and

free from drug-related risks across all our locations. This approach is fundamental to preventing potential health, safety, and environmental hazards that could negatively impact employees, customers, or the public.

In alignment with our safety principles, Nabors holds the expectation that our vendors and their subcontractors prioritize and provide a work environment that is safe, healthy, and free from the influence of drugs. Furthermore, we expect environmental responsibility to be a key consideration, ensuring that operations do not result in adverse impacts on the environment. This shared commitment reinforces our dedication to fostering safe and responsible practices throughout our operations and supply chain.

Conservation

Vendors are actively encouraged to contribute to the conservation of natural resources by minimizing their usage and promoting recycling whenever feasible. Additionally, vendors are required to exercise caution and prudence in their operations by avoiding the use of hazardous materials whenever alternatives are available. This commitment aligns with Nabors' dedication to sustainable practices and responsible resource management. We anticipate vendors to share in this responsibility, fostering environmentally conscious actions that contribute to the broader goal of minimizing ecological impact.

Environmental Compliance

Vendors are obligated to adhere to all pertinent environmental laws and regulations. This encompasses a firm commitment to full compliance with established legal requirements governing environmental practices. Nabors expects vendors to operate in strict adherence to these laws, ensuring that their activities consistently align with or surpass the prescribed environmental standards as dictated by applicable regulations. This commitment underscores our dedication to promoting environmentally responsible practices throughout our supply chain.

Waste Management

Nabors urges its vendors and their subcontractors to establish robust systems that ensure the responsible management of all waste, with a particular emphasis on hazardous waste. This encouragement reflects our commitment to environmental responsibility and sustainable waste management practices. By having effective systems in place, vendors contribute to minimizing environmental impact and fostering a culture of responsible waste disposal throughout the supply chain.

Processes, Emergency Preparedness and Response

Vendors engaged with Nabors are required to implement suitable processes to identify, prevent, and mitigate any potential risk of a chemical spill or other events that could jeopardize worker safety and/or harm the environment. These processes should encompass the development and implementation of emergency plans and response procedures in the event of an unsafe occurrence. By having these measures in place,

vendors contribute to the overall commitment to worker safety and environmental protection, aligning with Nabors' stringent standards and expectations in this regard.

Management Oversight

Vendors engaged with Nabors are expected to implement robust management systems aligned with these guidelines to:

- Identify and adhere to all applicable laws and regulations in the countries where they operate.
- Conduct comprehensive assessments and effectively manage risks across all areas addressed in these guidelines.
- Maintain meticulous documentation to demonstrate compliance with both these guidelines and relevant laws and regulations.
- Effectively communicate the expectations outlined in these guidelines and provide thorough training to workers.
- Foster a culture of continual improvement in processes to enhance overall operational efficiency.
- Allocate appropriate resources to ensure stringent compliance with these guidelines.

By adopting these management systems, vendors contribute to the sustained adherence to ethical, legal, and operational standards, fostering a culture of excellence and compliance throughout their operations.

Diversity In Nabors Supply Chain

The Procurement and Supply Chain division at Nabors is dedicated to fostering the growth and backing of a diverse supplier base. We guarantee equal opportunities for all vendors, irrespective of their size, geographic location, or workplace nationalities, to competitively engage in the supply of goods and services. We anticipate a reciprocal commitment to equality and fairness from our vendors and their subcontractors.

Commitment to Supplier Expectations

"All individuals representing Nabors are obligated to uphold the Nabors Vendor Guidelines. Nabors reinforces our dedication to this cause compliance with the U.S. Foreign Corrupt Practices Act, UK Bribery Act and other applicable anti-bribery laws. Oversight of Corporate Responsibility at the Board level is carried out by the Governance & Corporate Responsibility Committee and Risk Oversight committee. This document undergoes regular updates led by the Supply Chain team and the Supply Chain Executive Sponsors, who collaborate with functional experts and external advisors for guidance."

Sincerely,



Sigi Meissner

President – Energy Transition

Executive sponsor on Vendor Management-Purchasing and Supply Chain