

# Anti Bribery Compliance

DEPARTMENT	DOCUMENT NUMBER	REVISION	DATE ISSUED
Legal	NCS-LE-S.001	0	Jan-29-2026

## 01 PURPOSE

To provide expectations on full compliance with all applicable domestic and extraterritorial anti-bribery laws and regulations that apply to Nabors' activities around the world, including but not limited to The U.S. Foreign Corrupt Practices Act, The U.K. Bribery Act 2010 and The Bermuda Bribery Act. This standard is intended to supplement the general requirements for anti-bribery compliance found in the Nabors *Anti Bribery Policy* (NCS-LE-P.001), *Code of Business Conduct* (HUR-REF-001), *Code of Business Conduct – Compliance* (HUR-PRO-019) and other compliance policies.

## 02 APPLICATION

Applies to all Nabors employees, directors, officers, contingent workers, and agents.

## 03 STANDARD

### Standard Specific Definitions

- **Bermuda Bribery Act:** 2016 Bermuda law based on the U.K. Bribery Act 2010, applicable to both individuals and corporations. The Bermuda Bribery Act prohibits all forms of bribery, including Facilitation Payments.
- **United States Foreign Corrupt Practices Act (FCPA):** U.S. law that prohibits payment of money or anything of value to foreign government officials to secure any improper advantage in order to assist in obtaining or retaining of business. The books and records provision of the FCPA requires Nabors to maintain certain accounting records that accurately reflect our transactions.
- **U.K. Bribery Act 2010:** U.K. law that covers a wide range of bribery activities, including offering, promising or giving a financial or other advantage to induce improper performance of a function or activity. It applies to individuals and organizations with a close connection to the U.K. and prohibits Facilitation Payments.
- **Facilitation Payments:** Payments intended to expedite or secure the performance of “routine governmental action” by a government official.

### General Considerations

Violations of applicable bribery laws can subject you and the Company to potential criminal and civil penalties. Where applicable laws expressly provide for a fine to be imposed on a corporate employee under the antibribery provisions, it may not be directly or indirectly paid by the Company.

Officers, directors, employees, contingent workers, and agents who violate this standard and/or its governing policy are subject to disciplinary action, which can include loss of financial bonus, loss of incentive compensation and termination of their relationship with Nabors.

### Prohibited Practices

The following non-exhaustive list describes examples of activities prohibited under various applicable bribery laws:

- Payments made by company officers or employees, or agents acting on behalf of the Company, which could be interpreted as bribes, kickbacks or other improper payments, regardless of form to or for the benefit of any government official or foreign political party or candidate for foreign political office, in order to gain a business advantage.
- The establishment of undisclosed or unrecorded funds or assets by a company or any of its subsidiaries.
- Knowingly making false or artificial entries in the books or records of a company or its subsidiaries.
- Payments on behalf of a company or any of its subsidiaries authorized or made with the intention that they will be used for any purpose other than that described by supporting records.

## Suspect Situations

Below is a non-exhaustive list of typical situations that should put you on alert:

- Money or property passed through a consultant to a government official to obtain certain government actions.
- Use of consultants who are connected with the government or a political party in the country in which the company is doing business.
- Gifts or gratuities of more than nominal value to employees of government-owned companies (e.g., a national oil company), other government officials or political party officials, candidates for public office, or their families.
- Extravagant entertaining of employees of government-owned companies, other governments officials or party leaders or their families.
- Use of company facilities by such government officials.
- Requests for significant cash advances for travel to foreign countries.
- Expenditures from petty cash funds without supporting documentation.
- Any request that a commission or other payment be made in a third country or to another name.

Below is a list of prudent procedures regarding relationships with agents, contractors and consultants who act in a representative capacity (collectively “Agents”, see *Agent Policy* (NCS-LE-PR.005) for additional details):

- Agents should be investigated prior to engagement to ascertain experience, capability, reputation, character, and educational and work background.
- Relationships with Agents should be reduced to a written contract specifying services to be performed and compensation (including commissions) to be paid therefore.
- Agents shall agree in writing that they are aware of applicable bribery laws, will take no action in violation thereof, and will not make any payment or transfer anything of value, directly or indirectly, to any foreign official, political candidate, political party or official thereof, to influence any decision or to obtain or retain business.
- Commissions or other compensation should be reasonable in amount and customary in relationship to the services provided.

- Commissions or other compensation shall be properly reflected in the Company's records and financial statements.
- Agreements with Agents should include the Company's right to access and audit the Agent's books and records.
- A signed statement of continuing compliance with applicable bribery laws should be obtained from each Agent annually.
- Agent invoices should contain specific itemized descriptions for services performed and be accompanied by adequate supporting documentation for disbursements to be made on the Company's behalf.

## **Facilitation Payments**

The Company generally prohibits Facilitation Payments and seeks to avoid them except in very limited circumstances, such as where an individual's health, safety or security is at risk.

A demand by a government official for a payment that is accompanied by a physical threat is extortion, and a payment in this case would not be considered a Facilitation Payment, but rather a safety payment. Nevertheless, such a payment should be reported to the Legal Department as soon as possible and must be properly recorded in the Company's books and records, regardless of amount.

## **Supplier Contracts**

All supplier contracts must include language prohibiting the supplier from making payments in violation of applicable bribery laws and shall be reviewed in accordance with the Company's contract review policies and procedures.

## **Mergers and Acquisitions**

In connection with an approved merger with, acquisition of, or – when commercially reasonable – acquisition by, a third-party entity or business, Nabors shall conduct appropriate risk-based due diligence regarding the third-party entity or business prior to entering into any agreement that would prevent Nabors from deciding not to complete the merger or acquisition. Pre-acquisition due diligence may include a target company screening of the businesses and key personnel or include an investigative report; depending on the preliminary assessment of magnitude, complexities (products and/or geographies) and estimated time horizon to consummate the transaction. The due diligence may, as determined by the Chief Compliance Officer, also include the engagement of the use of external consultants and/or subject-matter experts with industry, geographical or political expertise.

Upon consummation of a merger or acquisition for which Nabors has the ability to impose its own Code of Conduct, policies and procedures regarding anti-bribery compliance ("Compliance Standards"), it shall implement and apply its Compliance Standards or equivalent standards to the newly acquired or merged entities and businesses as quickly as is practicable.

## **Questions or Concerns**

Employees are urged to ask questions whenever they have even the slightest reason to doubt the propriety of a particular activity, transaction or payment. If an employee is aware or suspects that Company personnel, agents, consultants or other representatives are violating or have violated applicable bribery laws, the employee shall immediately contact the Legal Department and report such information.

Please direct all inquiries or concerns regarding the propriety of any business activity, transaction or payment to the Nabors Legal Department.

#### 04 EXTERNAL REFERENCES

- United States Foreign Corrupt Practices Act (FCPA) - <https://www.trade.gov/us-foreign-corrupt-practices-act>
- U.K. Bribery Act 2010 - <https://www.legislation.gov.uk/ukpga/2010/23/contents>
- Bermuda Bribery Act 2016 – <https://www.bermudalaws.bm/Laws/Consolidated%20Law/2016/Bribery%20Act%202016>

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