

# Supplier Code of Business Conduct

## 1. Introduction

Civeo Canada Limited Partnership (Civeo or Company) has a long-standing reputation for integrity and trustworthiness among its stakeholders. The Company's reputation depends upon the way in which it conducts its business.

Commitment to ethical business practices, a key part of operating with honesty, integrity and respect, is a core value for Civeo. This Code of Business Conduct is designed to ensure that suppliers have a clear understanding of how Civeo expects to conduct its business with suppliers.

The Company expects full compliance with all principles and processes related to this Code of Business Conduct. All suppliers to Civeo must carefully review the commitments in this Code and agree to abide by the commitments as a condition of doing business with the Company.

## 2. Application

This Code applies to the Company's suppliers and their sub-suppliers and it also applies suppliers to all other businesses in the Civeo family of businesses. Suppliers are defined as those businesses that sell good and/or services to the Company or any other member of the Civeo family of businesses.

## 3. Civeo Principles of Business Conduct

Civeo employees – and this Code of Conduct – are guided by the following principles of ethical business practice:

- comply with applicable laws, regulations, Company policies and procedures;
- respect the lives, rights, privacy and property of others;
- avoid conflicts of interest in decisions that we determine or influence;
- conduct duties and business relationships in an honest, fair and responsible manner;
- sustain a culture in which ethical conduct is valued and recognized;
- maintain safe, healthy and secure work environments;
- use resources, material and energy as efficiently and responsibly as possible in the provision of products and services;
- foster a business environment that encourages open communication and seeks out, listens and responds to the ideas and concerns of stakeholders;

- manage compliance with the Supplier Code of Business Conduct as any other critical business activity.

### 3.1. Conflict of Interest

Civeo employees and directors owe primary loyalty to the Company. A conflict of interest arises when an employee or director has a personal or financial interest in a proposed Company action, even if the action is in the best interests of the Company. Employees are not permitted to participate in decisions where they have a conflict of interest. Employees and Directors must not ignore Company procedures or use their position for the benefit of those seeking to do business with the company or for their own personal interests or the interests of family, friends and colleagues.

## 4. **Supplier Expectations**

This section sets out the Company's specific expectations regarding the workplace standards and business practices of its suppliers. These expectations are consistent with the Company's values, principles and policies regarding ethical business conduct.

The Company will seek to identify and engage suppliers who conduct their business based on a set of ethical standards compatible with its own. The Company will favour suppliers who share its commitment to contribute to improving conditions in communities where they operate. The Company will not knowingly do business with suppliers who do not meet the standards outlined in this Code.

### 4.1. Compliance with Laws

Suppliers will comply with the laws and regulations, whether domestic or foreign, which govern the conduct of their businesses.

### 4.2. Respecting Human Rights

Suppliers will respect Civeo's Human Rights policy and will not discriminate against its employees on any ground prohibited by law.

### 4.3. Workplace Environment

Suppliers will provide workers with a safe and healthy working environment consistent with all applicable laws and regulations as well as all applicable Civeo policies.

### 4.4. Environmental Protection

Suppliers will comply with all applicable environmental laws and regulations in their country and laws as well as all applicable Civeo policies.

### 4.5. Unlawful Payments

Suppliers will not offer or accept unlawful payments.

### 4.6. Dealing with the Company's Employees

Civeo expects its employees to treat all suppliers – or those seeking to do business with the company – with honesty, integrity and respect. In conducting business on behalf of Civeo,

employees are bound by a Code of Business Conduct and Ethics. Suppliers are reminded that Civeo employees owe exclusive business loyalty to the Company. Employees must never be put in a position where personal or financial incentives or interests may impair their judgment and ability to make decisions in the best interest of the Company. It is never acceptable for any employee to pay or accept any bribe, kickback or other unlawful payment or benefit to secure any concession, contract or other favourable treatment. The Company expects its suppliers to respect our employees who are duty-bound to comply with Civeo's Code of Business Conduct and Ethics guidelines regarding gifts, entertainment and travel. The Company does not believe that its business goals are best advanced in an environment of entertainment and, thus, employees are discouraged from accepting gifts and entertainment that exceeds nominal value. Civeo does, however, encourage its employees and suppliers to come together in support of charitable events and programs where there is mutual interest.

#### **4.7. Sub-suppliers**

Suppliers will certify that their sub-suppliers comply with a set of ethical standards compatible with this Supplier Code of Business Conduct.

### **5. Supplier Certification**

All suppliers will certify that they have read this Supplier Code of Business Conduct and will agree to abide by it.

Suppliers will either complete the attached form or sign a contract with the Company, which incorporates the Supplier Code of Business Conduct.

Civeo will determine the frequency of certification.

### **6. Enforcement of Supplier Compliance with the Code**

The Company reserves the right to terminate its business relationship with any supplier who fails to comply with the Supplier Code of Business Conduct.

### **7. Reporting and Addressing Code Violations**

Any person who believes that a violation of the Company's Supplier Code of Business Conduct has occurred is asked to report the relevant information in confidence by calling 1-855-866-2133, an independent, toll-free Ethics Line or on line <https://civeo.alertline.com>.

The Company will make every effort to investigate all reported violations in a discreet, fair and confidential manner and will take appropriate action to maintain the integrity of its business.

### **8. Questions**

Suppliers should direct any questions they may have regarding the Supplier Code of Business Conduct to the Company employee with whom they normally deal or to the Business Conduct Office, Hotline or Web Reporting.

## 9. Supplier Certification Form

### Civeo Supplier Code of Business Conduct

I acknowledge that I have received a copy of Civeo Supplier Code of Business Conduct, dated May 23, 2024 that I have read and understood the contents, and that my company agrees to abide by this Code.

To the best of my knowledge, my company is in compliance with the Supplier Code of Business Conduct.

I have the authority to bind the company named below.

Name: \_\_\_\_\_

Position Title: \_\_\_\_\_

Company: \_\_\_\_\_

Signature: \_\_\_\_\_

Dated this \_\_\_\_\_ day of \_\_\_\_\_, in the year \_\_\_\_\_.

Please return a signed copy of this document to the attention of:

\_\_\_\_\_