



Helmerich & Payne Vendor Code of Conduct

This Vendor Code of Conduct (“Code”) describes the expectations of Helmerich & Payne, Inc. and/or its subsidiaries (collectively, the “Company”) with respect to how the Company’s vendors, suppliers and contractors (collectively, “Vendors”) conduct business. All Vendors engage in providing goods and/or services to the Company are expected to act in accordance with the Code, including aligning guidelines, policies and practices, and communicating and enforcing the Code provisions throughout their organization and across their supply chain, including to Vendor’s sub-vendors and subcontractors.

The Company requires that our Vendors understand the requirements of this Code, operate in accordance with the expectations outlined in this Code and comply, at a minimum, with all applicable laws, rules, regulations and standards within the geographies in which they operate. In instances where standards outlined in the Code differ from local laws, Vendors must respect these standards within the framework of the applicable local laws. This document summarizes the Company’s expectations from Vendors, sub-vendors and their staff.

I. Expected Regulatory Compliance Practices

Vendors and their representatives are expected to:

- Conduct business in compliance with antitrust and fair competition laws that govern the jurisdictions in which they do business;
- Comply with the anti-corruption laws of the countries in which they do business;
- Not make any direct or indirect payments, proposed payments, facilitating payments, or offer something of value to another person or someone who is an employee of the government or a public agency with the intent to influence him or her;
- Comply with all applicable environmental laws and regulations;
- Be honest and truthful in discussions with regulatory agency representatives and government officials;
- Comply with all applicable trade control laws that apply to the Company’s operations; and
- Not impose improper boycott requirements on the Company.

II. Expected Business Practices

Vendors and their representatives are expected to:

- Honestly and accurately record and report all business information and comply with all applicable laws regarding their completion and accuracy;
- Comply with the intellectual property ownership rights of the Company and others, including but not limited to patents, trademarks and trade secrets and use software, hardware and content only in accordance with their associated license or terms of use;
- Protect and responsibly use the physical and intellectual property of the Company;
- Comply with the Company’s requirements for maintenance of passwords, confidentiality and security, and follow its privacy procedures as a condition of receiving access to the Company’s internal corporate network, systems, and buildings, as applicable;
- Use good judgment and moderation when offering gifts or entertainment to Company’s directors, officers, employees and agents (individually, a “Covered Person,” and collectively, “Covered Persons”);
 - In general, Vendors and their representatives should refrain from giving a Covered Person, or a Covered Person’s immediate family, improper personal



benefits or gifts of more than token value, loans or guarantees of obligations, excessive entertainment, or other substantial favors. Gifts of more than token value, loans or guarantees of obligations, excessive entertainment, or other substantial favors. Gifts of nominal value, entertainment, meals, or social invitations which are customary and proper under the circumstances, are for legitimate business purposes (e.g., team-building, goodwill, and enhancing relationships with customers), are in keeping with good business ethics, and do not place the recipient under obligation or create the appearance that Company is entitled to preferential treatment are allowed, provided that any such gifts or entertainment given or received must comply with the law and be consistent with Company policy.

- Vendors and their representatives should never offer a bribe, kickback or bartering arrangement for goods or services or any other incentive to a Company associate to obtain or retain H&P business.
- Avoid a conflict of interest or even the appearance of a conflict of interest;
- Avoid insider trading by buying or selling the company's or another company's stock when in possession of information about the Company that is not available to the investing public and that could influence an investor's decision to buy or sell stock; and
- Create, retain and dispose of business records in full compliance with all applicable legal and regulatory requirements.

III. Expected Employment Practices

Vendors and their representatives are expected to:

- Cooperate with the Company's commitment to providing a workplace free of sexual or other harassment and discrimination;
- Provide a safe and healthy work environment and comply with all applicable safety and health laws, regulations and practices;
- Prohibit the use, possession, distribution and sale of illegal drugs while on Company owned or leased property and comply with the Company's Policy Regarding the Use and Possession of Drugs, Alcohol and Firearms and Marijuana and the Workplace policy (copies of which will be provided to Vendor upon request);
- Use only voluntary labor; the use of forced labor, whether in the form of indentured labor or otherwise, is prohibited;
- Comply with all local wage, hour and minimum working age laws and requirements; the use of child labor is prohibited; and
- Maintain employee records in accordance with local and national regulations.

IV. Reporting Concerns and Requesting Assistance

If a Vendor or Vendor representative has a question about a situation, or needs to report a problem or concern, they are encouraged to work with their primary Company contact in resolving the business practice or compliance concern. The Company recognizes, however, that there may be times when this is not possible or appropriate. In such instances, a Vendor or Vendor representative can:

- Contact the Company's helpline, which can be accessed 1-800-205-4913 or convercent.com/report; or
- Send an email to the Company's Compliance Department at HPCompliance@hpinc.com.



THE GLOBAL DRILLING
SOLUTIONS COMPANY

The Company does not tolerate retaliation against another person. No one who reports any suspected legal or policy violation in good faith will be subject to retaliation for making such a report. Good faith means that the individual coming forward with the information believes he or she is giving sincere, truthful and complete report.