



FRANK'S INTERNATIONAL

Business Partner Code of Conduct and Ethics

Message from John Symington, Senior Vice President, Secretary, General Counsel and Chief Compliance Officer of Frank's International N.V.

For more than 80 years, Frank's International has been committed to serving the oil and gas industry with the expertise and innovation necessary to be a leader in the field. As we continue our journey, we must also continue to make a commitment to operating Frank's business with the honesty, integrity and trustworthiness our customers and business partners have grown to expect from us. Frank's continued success relies on the preservation of its good reputation. We seek to earn and maintain the trust of our customers, vendors, regulators, shareholders and employees. It is Frank's goal to maintain the highest standards of ethical and legally-compliant behavior in all business activities and to avoid actions that could lead to even the appearance of improper business conduct. Because we are committed to upholding these values, we expect our business partners to be aware of and uphold Frank's Business Partner Code of Conduct and Ethics.

Each Frank's business partner is expected to read, review, discuss and understand Frank's Business Partner Code of Conduct and Ethics, and to fully embrace it. If you find yourself with questions or in doubt about a decision or possible action, please seek guidance as outlined in this document.

Sincerely,



John Symington

Senior Vice President, Secretary, General Counsel and Chief Compliance Officer

Frank's International N.V.

This Business Partner Code of Conduct and Ethics ("Code") applies to all of Frank's vendors, suppliers, service providers, agents, distributors and resellers, joint venture partners, consultants and intermediaries, (collectively, Frank's "business partners"). As a guiding principle, Frank's business partners must comply with all applicable laws and regulations governing their business activities, but the commitment does not stop there. Ethical business conduct is of paramount importance to Frank's relationship with its business partners. The following standards, therefore, while not all-inclusive, serve as guidelines for Frank's business partners regarding the company's expectations around ethical business practices.

- **Anti-Bribery and Anti-Corruption:** Business partners must comply with the United States Foreign Corrupt Practices Act and the U.K. Bribery Act, as well as any local anti-corruption and anti-bribery laws where Frank's operates. These laws make it illegal for companies to pay or offer to pay anything of value to foreign government officials or other persons to obtain or retain business. Agents, distributors, resellers, joint venture partners, and consultants/intermediaries must pass Frank's rigorous due diligence process before they are approved as a Frank's business partner.
- **Anti-Harassment and Anti-Discrimination:** Frank's expects its business partners to maintain a workplace free from discrimination, where each individual has equal employment opportunity regardless of sex, race, color, age, religion, national origin, height, weight, marital status, sexual orientation, disability, or veteran status. The company also expects its business partners to maintain a workplace that is free from all forms of harassment, including sexual harassment. Any complaint alleging harassment or discrimination will be investigated without the threat of retaliation against the individual who files the complaint.
- **Anti-Money Laundering and Criminal Activity:** Frank's is committed to ensuring that all of the transactions that we enter into are not associated with criminal activities such as money laundering or other financial crimes, and its business partners must also be committed to this practice. Examples of prohibited conduct include tax evasion, price-fixing schemes, collusion, industrial espionage, shell companies, and hidden/disguised owners or beneficiaries. Business partners are required to report instances of such conduct to their Frank's contact or to the Compliance & Ethics Hotline described below.
- **Conflicts of Interest:** Frank's expects its business partners to work with Frank's employees to identify and prevent situations where there is an actual conflict of interest or even the appearance of such. Any material transaction or relationship that involves or may involve a real or potential conflict of interest must be promptly disclosed to an authorized Frank's representative for further evaluation. Business partners must certify annually that they are free from conflicts of interest either through a contractual provision or on a standalone certification basis.

- **Fair Dealing and Antitrust:** Business partners are prohibited from colluding with Frank's employees to limit or restrict competition in the marketplace. Frank's strives to deal fairly with all business partners and expects business partners to follow all laws protecting free enterprise and companies and consumers from unfair business practices. Business partners are prohibited from price-fixing, bid-rigging, dividing markets/territories or customers, and restricting sales/output with Frank's employees or on the company's behalf.
- **Gifts, Entertainment and Hospitality:** Frank's expects its business partners to adhere to the company's guidelines for the exchange of business courtesies such as gifts, meals and entertainment. Providing Frank's employees with cash or a cash equivalent of any kind is strictly prohibited. Acceptable forms of entertainment may include infrequent, moderate hospitality such as meals or gifts of nominal value. Unacceptable forms of entertainment include gambling or sexually-oriented entertainment. Your Frank's contact can answer any related questions you may have.
- **Health and Safety:** Frank's expects its business partners to provide a safe and healthy work environment for their employees, subcontractors, customers, and all visitors to their premises. Business partners should require regular safety training and reviews, follow all safety policies, procedures and work rules, and comply with all local and federal safety regulations.
- **Intellectual Property:** Frank's expects its business partners to protect Frank's and others' intellectual property, including trademarks, trade secrets, patents and copyrights.
- **International Trade:** Compliance with customs, sanctions and other trade control laws is critical to Frank's business in international locations. These laws apply to the products we make, the services we provide, the people we transport and the technical information we transfer. Accordingly, Frank's business partners must obtain all necessary licenses and permits applicable to the company's imports and exports to ensure every cross-border transaction includes proper import and export classification, valuation, and country of origin information. Business partners must also know where Frank's is authorized to operate. Trade sanctions and boycotts impose restrictions on who we can do business with; Frank's business partners are restricted from participating in any boycott or trade restriction that would violate U.S. or other applicable law.
- **Records Management and Privacy:** Frank's expects its business partners to honestly, accurately, and timely record and report all business information (including financial records) to ensure that such information is maintained in a manner consistent with applicable laws and regulations and that effective internal controls are in place to comply with these requirements. Additionally, Frank's business partners must protect the confidentiality and privacy of these records and allow only authorized personnel to access and use those records for authorized

business purposes. Frank's expects to be advised immediately of any clerical or accounting errors as they become known and when there may have been an inadvertent disclosure of confidential or private information.

Not only does Frank's expect its business partners to adhere to the standards and practices outlined above, we also expect them to ask questions and report concerns regarding possible ethical or legal violations so that Frank's can respond, investigate, and resolve such issues. Frank's Compliance & Ethics Hotline is a confidential and anonymous reporting system available to all business partners to raise concerns or ask questions, either online via <http://franksinternational.silentwhistle.com> or toll-free at +1 800 923 9553. Frank's promptly investigates all reports of violations and treats these investigations confidentially. Frank's does not tolerate any form of retaliation against an individual or a firm who raises a good faith concern regarding misconduct of its employees or its business partners, and the company expect its business partners to follow this same rule.

While no set of guidelines can be all-inclusive, adhering to Frank's Business Partner Code of Conduct and Ethics and the core values at its foundation is critical to the success of Frank's business partnerships. Upholding the highest standards of ethical business conduct is a shared responsibility between Frank's and its business partners. It is the responsibility of the business partner to ensure that its representatives understand and comply with this code. Frank's looks forward to doing business with partners who understand this responsibility and join in Frank's commitment to these principles.