
SUPPLIER CODE OF CONDUCT

Global

Date: 11-05-2024



INTRODUCTION

PHX Energy Services Corp. and its subsidiaries ("Phoenix", "we", "our" or the "Corporation") require the highest standards of professional and ethical conduct from our suppliers, contractors, agents, and other partners, including any entity that provides Phoenix with goods, services, or human resources (hereafter collectively referred to as "Suppliers"). We continue to actively pursue Suppliers that share our values regarding business ethics, safe and healthy workplace, and social and environmental responsibility. Supplier cooperation and adherence to this Code of Conduct ("Code") is necessary for the continued success of our ESG initiatives and to ensure our Corporation and associated supply chain maintain a reputation as good corporate citizens.

RESPONSIBILITY OF SUPPLIERS

Suppliers need to understand and comply with the requirements outlined in this Code. It is the Supplier's responsibility to notify Phoenix of any actual or suspected breaches of this Code or if there are other circumstances that could negatively impact Phoenix's operations or reputation.

COMPLIANCE WITH LAWS, POLICIES, PROCEDURES AND STANDARDS

Suppliers must comply with all applicable laws, rules, regulations, and generally accepted standards in the jurisdictions in which they operate and avoid even the appearance of impropriety. For greater certainty, Suppliers are prohibited from engaging, either directly or indirectly, in corruption, bribery, extortion, fraud, or any other practice that breaches applicable laws or puts Phoenix at risk in any way.

BUSINESS INTEGRITY AND ETHICS

Phoenix requires the highest standards of professional and ethical conduct from all those who work with or on behalf of the Company. We expect Suppliers to conduct themselves in an ethical manner at all times demonstrating honesty, fairness, respect, and integrity.

An essential element of our business is that no Supplier shall receive preferential treatment. Suppliers are expected to exercise good judgement in dispensing or receiving gifts and entertainment. No exchange should ever create a sense of obligation on the part of either party.

HUMAN RIGHTS & LABOR

It is expected that Suppliers not only meet applicable labor laws but also treat their personnel with respect and dignity. Suppliers shall not permit any violence, discrimination, harassment, or abuse including physical, sexual, verbal, or psychological.

Suppliers should consider all personnel based on their qualifications, experience and skills while respecting and providing for diversity, equity, and inclusion of their personnel. This includes applicable laws relating to human rights, accommodation, and accessibility.

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Suppliers shall respect human rights principles and not utilize modern slavery (i.e. forced labor, child labor, bonded labor, debt bondage, domestic servitude, sex trafficking and human trafficking). Suppliers' personnel shall not be subjected to unnecessary risk jeopardizing their health and safety.

HEALTH, SAFETY & ENVIRONMENT

We are all responsible for maintaining a safe workplace by following safety and health rules and practices. Suppliers must be committed to keeping their workplaces safe and performing their business activities in a manner that mitigates environmental impacts.

Phoenix is sensitive to the environmental, health and safety consequences of its operations. Accordingly, Phoenix insists upon strict compliance with all applicable Federal, Provincial and State health, safety and environmental laws and regulations and expects the same from our Suppliers. Suppliers are expected to implement programs, training, audits, and controls necessary to achieve compliance with these laws and mitigate associated risks.

CONFIDENTIALITY AND INTELLECTUAL PROPERTY

Suppliers may be in receipt of information or products that are protected intellectual property and thereby confidential in nature. Suppliers are expected respect confidentiality and to comply with applicable data protection laws and industry best practices, including having the proper processes and procedures to ensure the protection of Phoenix's information against accidental, unauthorised or unlawful loss, destruction, alteration, disclosure, use or access. Any use of Phoenix property must receive prior approval from the appropriate Phoenix authority.

COMPLIANCE

Compliance with both the letter and spirit of all laws, rules and regulations applicable to our business is critical to our reputation and continued success. Failure to comply with applicable laws, regulations and standards could result in punitive measures including termination of contract.

It is expected that Suppliers have internal avenues in place that provide personnel opportunities to disclose illegal, unethical or otherwise improper conduct without retaliation or consequences for reporting.

At Phoenix, we have a strong commitment to conduct our business in a lawful and ethical manner. Supplier personnel are encouraged to talk with their Phoenix contact when in doubt about the best course of action in potentially unethical or unlawful situations with respect to interactions with Phoenix. If you do not feel comfortable discussing the matter with your Phoenix contact, please call any of the following:

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CONTACT	POSITION & EMAIL	PHONE NUMBER
Whistleblower Hotline	Whistleblower@phxtech.com	403-930-9047
Doug Webb	Global Quality & HSE Manager / Compliance Officer dwebb@phxtech.com	403-589-9001
Ron Mueller	Director, Global Supply Chain & US Production rmueller@phxtech.com	713-647-1541

ACKNOWLEDGEMENT

I ACKNOWLEDGE that I have read and considered the Code and agree to adhere to the requirements outlined in the Code.

Name

Company

Signature

Position

Date