

CHAMPIONX CORPORATION

Supplier Code of Conduct



Letter from Our CEO

Our teams throughout the world have been steadfast in safeguarding and enhancing our reputation for quality, and delivering outstanding products and services to our customers. This is an essential part of our efforts to position ChampionX as a leader in every market we serve. All of us at ChampionX are proud that we have conducted our business over the years with honesty and integrity in everything we do.

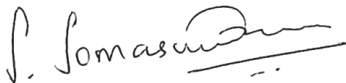
ChampionX values its reputation for conducting business in a legally compliant and ethical manner. Consistent with this commitment, ChampionX wants to do business with those who share in its culture, values and ethical business practices. ChampionX has developed this Supplier Code of Conduct to guide its suppliers as to how to engage in ethical, responsible and legal business practices in their operations around the world. These expectations mirror the standards ChampionX sets for its own employees, officers and directors, as described in the ChampionX Code of Business Conduct and Ethics.

ChampionX requires its suppliers to:

- Act with honesty and integrity
- Understand and comply with the laws and regulations that apply to your business in the countries where you do business
- Read, understand and follow this Supplier Code
- Ensure compliance with this Supplier Code by each of your officers, directors, employees, other workers, representatives, agents, subcontractors and sub-tier sources who are involved in the procurement and production process related to products and services provided to ChampionX
- Cooperate with inspections, audits and investigations

We expect that our suppliers embrace ethical business practices. We appreciate your renewed commitment to protecting and strengthening these principles.

Sincerely,



Soma Somasundaram



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Prior to engaging in business or during an existing business relationship, ChampionX may conduct diligence on its suppliers and their owners and key personnel to assess compliance with this Supplier Code and address ChampionX’s business needs. This diligence may involve checking watch lists and sanction lists as well as checking other publicly available information about companies and individuals. Any use by us of your personal information will be carried out in accordance with our privacy notice available at www.ChampionX.com. The records collected will be maintained in accordance with ChampionX policy and may be viewed upon request.



Introduction

A. Purpose and Applicability

This Supplier Code of Conduct is an extension of the ChampionX Code of Business Conduct and Ethics. The Supplier Code establishes the standards for conducting business with ChampionX. ChampionX seeks out and expects that its suppliers use this Supplier Code as a guide for ethical, responsible, and legal business practices in their operations.

This Supplier Code does not alter any of the terms and conditions in applicable agreements, nor does it create contractual rights for suppliers or others. ChampionX will update this Supplier Code periodically and will expect suppliers to stay current.

“ChampionX” means ChampionX Corporation, including its segments, platforms, operating companies and subsidiaries.

“Supplier Code” means this Supplier Code of Conduct. “Suppliers” or “you” means any company, corporation or other entity or person that sells, or seeks to sell, goods or services to ChampionX, including the supplier’s employees, other workers, representatives, agents, subcontractors and other sub-sources.

Comply with Applicable Laws, Rules and Regulations

Each supplier must comply with all laws and regulations applicable to its business in the countries where it does business. While laws, regulations, business practices and customs can vary greatly from one country to the next, this Supplier Code sets forth the minimum requirements that all of ChampionX's suppliers must meet.

A. Anti-Bribery and Anti-Corruption

Offering or paying bribes or anything of value to win business or obtain an unfair advantage is unacceptable, even if business is lost or difficulties are encountered as a result (for example, delays in obtaining permits or licenses). Bribes and other corrupt payments may violate multiple anti-corruption laws and expose individuals, ChampionX's suppliers and ChampionX to civil and criminal liability and severe penalties. Violations could also result in the loss of future government contracts. ChampionX's suppliers are prohibited from engaging in corruption, extortion or embezzlement in any form.

Examples of Red Flags: Anti-Bribery and Anti-Corruption

- Offers of extravagant or multiple gifts or entertainment
- Third parties who do not clearly account for their expenditures or whose commissions seem in excess of the services provided
- Customers or officials who hint or suggest that certain payments be made to obtain business or information
- A request that a third party make a payment to an official to expedite the handling of a matter such as customs clearance

Examples of Red Flags: Gifts, Entertainment and Hospitality

- Gifts or entertainment involving a government official
- Gifts or entertainment of more than nominal value
- Gifts or entertainment of any value offered to a ChampionX employee in a position to make a decision about the gift giver
- Inappropriate gifts such as cash
- Gifts or entertainment offered during a tender process

B. Gifts, Entertainment and Hospitality

ChampionX's suppliers are required to understand and comply with this Supplier Code and the law when offering or accepting any gifts, favors, meals, entertainment or hospitality to or from ChampionX employees, customers or other business partners or their family members. Any such gift, entertainment or hospitality must be consistent with customary regional business practices and the recipient's policies—and it must not adversely affect the reputation of ChampionX or the supplier if publicly disclosed. In addition, ChampionX's suppliers must not create or give the appearance of a conflict of interest when engaging in these practices.

Examples of Red Flags: Global Trade Compliance

- Suppliers who attempt to provide lower value invoice totals with imports to lower duties owed on imported goods or who misclassify goods on invoices to avoid antidumping duties
- Suppliers who transship products to hide actual country of origin or content that would be subject to importing country restrictions or sanctions

C. Global Trade Compliance

ChampionXs suppliers are required to comply with all applicable U.S. and international trade laws and regulations, including import, export and re-export controls regulations, as well as applicable embargoes and sanctions, in each case to the extent they are not inconsistent with U.S. law.

Examples of Red Flags: Fair Dealing and Competition Laws

- Any competitor who attempts to discuss competitive information such as pricing, bids, sales or territories
- Discussions at trade associations, meetings or events where competitors are in attendance which relate to prices, markets, profits or other topics that could be of interest to competitors

D. Fair Dealing and Competition Laws

ChampionX succeeds by competing fairly and dealing truthfully with customers and business partners, without manipulation or concealment. ChampionX's suppliers are required to uphold fair business standards in advertising, sales and competition. ChampionX's suppliers are required to comply with applicable antitrust and competition laws where they do business. These laws prohibit agreements between competitors that affect prices, costs, terms or conditions of sale, the markets in which they will compete or customers or suppliers with whom they will do business. These laws may also regulate distribution agreements, rebates, discounts or territorial restrictions on resellers.



E. Conflicts of Interest

ChampionX's suppliers must avoid involvement in actual or apparent conflicts of interest between the supplier's interests and the interests of ChampionX. Any actual or apparent conflict of interest should be disclosed.

Examples of Red Flags: Conflicts of Interest

- A supplier employee has a second job at a current or potential competitor of ChampionX
- A supplier has a substantial ownership interest in a current or potential competitor of ChampionX (other than nominal investments in public companies)

F. Anti-Money Laundering

ChampionX conducts business only with reputable suppliers involved in legitimate business activities using funds from legitimate sources. ChampionX's suppliers are required to comply with applicable laws relating to money laundering.

- Any customer, supplier, agent or partner who provides incomplete or suspicious information
- Funds paid to/from unusual sources or to/from countries not normally associated with the customer

Examples of Red Flags: Anti-Money Laundering

- Any proposed or actual payments in cash from a customer or partner
- Customers who overpay for goods or services, and then request a refund



G. Conflict Minerals

ChampionX's suppliers must cooperate in due diligence requests made by ChampionX with respect to the origin of intermediaries associated with the purchases of materials or products containing Conflict Minerals, whether or not those materials or products may have been mined or produced in the Covered Countries or obtained from recycled sources, in compliance with ChampionX's reporting requirements under the U.S. Dodd- Frank Act Section 1502. Where specified in a purchase order or supply agreement, suppliers will comply with any ChampionX requirement to provide products, components, parts and materials which are free of Conflict Minerals mined or produced in the Covered Countries in support of armed conflict in the region. See ChampionX's Conflict Minerals Policy for more information.

"Conflict Minerals" are tin (Cassiterite), tungsten (Wolframite), tantalum (Columbite-tantalite or coltan) and gold, and the derivative metals from these minerals. The "Covered Countries" are the Democratic Republic of the Congo, Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia.

H. Environment

ChampionX is committed to creating economic value for shareholders and customers through sustainable practices that protect the long term well-being of the environment, ChampionX's employees and the communities in which it operates. ChampionX's suppliers are required to comply with all applicable environmental laws, regulations and standards and minimize any adverse impact on the environment.

ChampionX's suppliers must also endeavor to conserve natural resources and energy and reduce or eliminate waste and the use of hazardous substances.

I. Inside Information

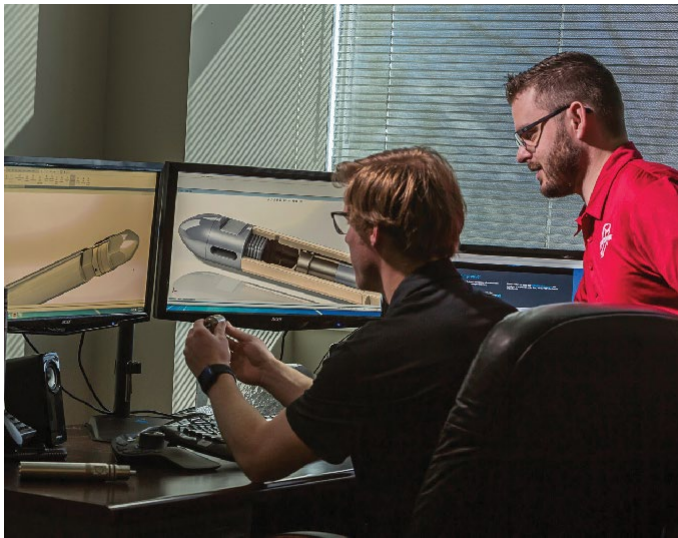
You must not buy or sell the securities of ChampionX or any other company if you possess inside information that is not available to the investing public and could influence an investor's decision to buy or sell the security (for example information about winning or losing a contract). You also cannot give inside information to others who might use it to buy or sell securities.

Protect ChampionX's Assets, Information and Reputation

ChampionX's suppliers are required to preserve, protect and responsibly use ChampionX property that they have access to, and protect it from theft, damage, loss and misuse. This includes physical and intangible assets such as ideas, innovations, technology, brands and confidential information.

A. Intellectual Property

Suppliers are required to respect intellectual property rights, both during their contract with ChampionX and thereafter. Patents, copyrights and trademarks belonging to others may not be used without express permission from the owner. Any transfer or sharing of technology or know-how must be done on a need-to-know basis and in a manner that protects intellectual property rights and is in compliance with local law.



B. Confidential Information, Data Security and Privacy

Suppliers are required to safeguard ChampionX's proprietary and confidential information, which includes all information, whether written or oral, that ChampionX has a legitimate business interest in protecting. This includes technical, design or process data, improvements, new products, products in development, inventions, models, manuals, know-how, financial data, pricing information, business development or acquisition plans, marketing plans, project practices and customer and supplier lists.

Suppliers are required to follow all applicable privacy laws that govern the handling of information and data provided by ChampionX, which may include private and sensitive personal information.



C. Records Management and Cooperation with Inspections, Audits and Investigations

Suppliers must retain documents and records in accordance with applicable law, including accounts, quality reports, time records, expense reports and submissions to ChampionX, regulatory authorities or others. This also includes documentation necessary to demonstrate compliance with law and this Supplier Code or relevant to any pending litigation, an audit or investigation. Suppliers must cooperate with requests for inspections, audits and investigations by ChampionX or any of its authorized agents relating to compliance with this Supplier Code.

Examples of Red Flags: Confidential Information, Data Security and Privacy

- Discussing confidential information with third parties without a confidentiality agreement
- International data transfers involving personal data from the European Union
- Inadvertent disclosure of confidential information in external meetings
- Unattended or unprotected computers or mobile devices that contain ChampionX proprietary and confidential information
- Requests for data from questionable sources
- Non-transparent subcontracting by suppliers of data processing and cloud computing
- Using ChampionX's proprietary or confidential information beyond the scope of the engagement or for the supplier's or other's benefit

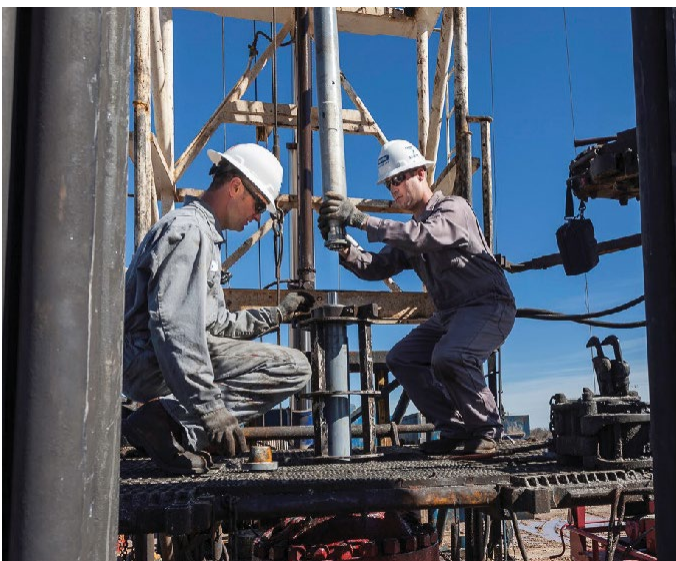
Maintain a Fair and Safe Workplace

A. Safety

ChampionX's suppliers have a responsibility to promote a safe, clean and secure workplace and conduct operations in compliance with applicable health and safety laws and regulations. ChampionX also requires its suppliers to know, understand and comply with all applicable laws governing product safety and quality.

Examples of Red Flags: Safety

- Failure to follow applicable safety regulations or policies
- Unsafe workplace conditions or practices such as exposed hazards, blocked emergency exits or failure to use safety equipment
- Workers using, possessing or being under the influence of alcohol, illegal drugs or any substance that could interfere with safely performing their work
- Providing worker accommodations that are not clean, safe or meet basic needs
- Failing to adhere to product safety and quality requirements



Examples of Red Flags: Ethical Employment Practices and Non-Discrimination Policy

- Failing to comply with laws relating to minimum and maximum wages, overtime and/or legally mandated benefits
- Hiring for employment or work a child who is below the age of 15 or below the age for completing compulsory education in the country of work
- Requiring a medical test that could be used in a discriminatory way, except where required by applicable law or where prudent for workplace safety
- Sourcing materials from supply chains associated with human trafficking or slavery
- Employing a worker whose employer is withholding wages until a recruitment fee and related interest debt is repaid

B. Ethical Employment Practices and Non-Discrimination Policy

ChampionX recognizes the value of diverse skills, ideas and backgrounds, and requires its suppliers' workplaces to be professional and free from discrimination, harassment and abuse. Each supplier must, in relation to employees, other workers and applicants for employment, as applicable:

- Treat each person with dignity and respect, and afford them equal opportunity to the fullest extent provided by law
- Not discriminate in hiring and employment practices based on characteristics that are protected by local law
- Respect the right to freely associate or not associate with any group in compliance with local laws
- Comply with all applicable wage and hour laws
- Comply with all applicable local laws with respect to child labor
- Not use forced, bonded, involuntary, prison or indentured labor
- Not intentionally source materials from supply chains associated with human trafficking and take reasonable efforts to assure that its own suppliers comply with this requirement



How to Report Concerns

ChampionX takes violations of this Supplier Code seriously. If a supplier violates any of the requirements contained in this Supplier Code, ChampionX may terminate the relationship. In appropriate cases, ChampionX may also refer misconduct to the proper authorities. Suppliers should report known or suspected violations of this Supplier Code. Methods of reporting include:

Reporting Concerns

- Your primary business contact at ChampionX
- ChampionX's Global Hotline at 1-844-742-7279 (for calls from the U.S.)
- Web-based report through www.ChampionX.ethicspoint.com
- ChampionX's Law Department at general.counsel@ChampionX.com or mail to

ChampionX Corporation
2445 Technology Forest Blvd.
Building 4, 12th Floor
The Woodlands, TX 77381 USA
Attention: Law Department

You may report anonymously where local law permits. Please keep in mind that the more information you provide, the easier it will be for ChampionX to investigate and appropriately respond to your report. Unless otherwise required by local law, ChampionX will treat reports of violations confidentially.