

**ChampionX Corporation**

# **Code of Business Conduct & Ethics**



## Letter from Our Chief Executive Officer

Dear Colleagues,

I am proud of our unified and unwavering commitment to operating with integrity. Our culture makes ethics a priority, and because of that we earn our global reputation for conducting business with integrity.

Our standing as a highly ethical enterprise is an important, distinguishing characteristic of ChampionX Corporation. By continuing to meet the high expectations we place on ourselves, we protect an essential part of what makes us successful and ensure we can achieve our purpose of improving lives for our employees, customers, shareholders, and the communities where we live and work.

Our employees work diligently to create the most trusted brands in oilfield services and specialty chemicals, recognized for quality, performance, and customer service while doing business with the highest ethical standards. As we serve new markets, engage with new customers, and expand globally, we must continue to operate with the highest ethical standards wherever we do business, and in every market we serve.

The Company's Board of Directors has adopted this Code of Business Conduct & Ethics, which applies to all employees, officers, and directors of the Company and its subsidiaries, and to all third parties that conduct business on the Company's behalf. Employees, officers, and directors are required to certify compliance with the Code on an annual basis.

The Code should be used as a reference, providing guiding principles and valuable information at all times. Please read it carefully and refer back to it as needed. In every decision we make, we should make preserving our reputation for ethical and lawful business performance our highest priority. By understanding and applying the information in the Code, you make a deliberate choice to advance our commitment to integrity while making a real contribution to our future success.

If you have any questions or concerns about the Code, believe you have witnessed, or know of suspected Code violations, we provide several ways for you to be heard, including raising your concerns with your manager. You are obligated to come forward with your concerns.

Let us all continue our commitment to protect and strengthen ChampionX's reputation for integrity and uphold the standards set forth in the Code.

Sincerely,



Soma Somasundaram



**Table of Contents**

- I. Introduction..... 5**
  - A. Purpose ..... 5
  - B. Applicability..... 5
  - C. Accountability ..... 6
- II. Ask Questions and Voice Concerns..... 7**
  - A. How to Seek Guidance and Report Concerns ..... 7
  - B. Non-Retaliation Policy ..... 8
  - C. Investigations..... 8
  - D. Consequences of Code Violations ..... 8
  - E. Waivers..... 8
- III. Maintain a Fair and Safe Workplace..... 9**
  - A. Ethical Employment Practices and Non-Discrimination Policy..... 9
  - B. Safety ..... 11
  - C. Political and Charitable Contributions ..... 11
- IV. Protect ChampionX’s Assets, Information and Reputation..... 13**
  - A. Technological Equipment..... 13
  - B. Intellectual Property..... 14
  - C. Confidential Information..... 14
  - D. Electronic Communications ..... 16
  - E. Data Privacy and Protecting Employee Data ..... 16
  - F. Records Management ..... 18
  - G. Communications with the Public, Investors and the Media..... 18
- V. Act in ChampionX’s Best Interests ..... 19**
  - A. Conflicts of Interest..... 20
  - B. Corporate Opportunities ..... 21
  - C. Cooperation with Audits and Investigations ..... 22
  - D. Investments ..... 22
- VI. Comply with Applicable Laws, Rules and Regulations ..... 23**
  - A. Financial Integrity ..... 23
  - B. Inside Information ..... 25
  - C. Fair Dealing and Competition ..... 25
  - D. Global Trade Compliance ..... 28
  - E. Anti-Bribery and Anti-Corruption..... 30
  - F. Environment ..... 32

Our Code applies to all employees, officers and directors of ChampionX Corporation. Throughout our Code, “ChampionX” refers to ChampionX Corporation and all of its subsidiaries. References to “we” or “our Company” can be associated with ChampionX, a specific subsidiary or its employees, depending on the context in which it is used. The Company reserves the right to amend our Code at any time, as it may be desirable and in the best interests of ChampionX, and as required by changes in law.

This Code does not alter any of our terms and conditions of employment, nor does it create contractual rights for you or others.



# Introduction

## A. Purpose

At ChampionX, we understand that our success depends on our reputation for conducting business in a legally compliant and ethical manner. We have developed this Code of Business Conduct and Ethics (our “Code”) to assist each of us in upholding our Values as we pursue our goal to be the leader in every market we serve.

Our Code guides us as to how to engage in ethical, responsible and legal business practices in all of our operations around the world. Our Code shows us how to interact ethically with our stakeholders — including our fellow employees, customers, suppliers, competitors, governments and communities — and act in the best interests of our shareholders.

Understanding and following our Code is a vital part of maintaining our culture and reputation. You will find many resources throughout our Code to help you make the best possible decisions when conducting ChampionX business. Our Code should be read in conjunction with the Company’s separately maintained policies, as well as any procedures specific to a particular country or business unit (collectively, the “Policies”). The Policies, while not a part of the Code, support and provide important details regarding specific application of various parts of our Code.

This Code is not a contract of employment and is not intended to create any express or implied obligations, promises or guarantee any fixed terms of employment.

ChampionX reserves the right to amend this Code at any time, as it may be desirable and in the best interests of ChampionX, and as required by changes in law.

## B. Applicability

Each of us plays a crucial role in our Company’s ethical culture and business practices. This includes full time and part time employees and officers of ChampionX Corporation and all of its subsidiaries worldwide, along with the Company’s Board of Directors. When we refer to ChampionX in this Code, we are referring to all of us, and we are all guardians of our Code, regardless of our location, position, business unit or operating company. Therefore, we must all abide by the same rules. In doing so, we help to create a better, stronger ChampionX.

In addition, ChampionX seeks out business partners — distributors, suppliers, consultants, agents and other third-party providers — who act in a manner consistent with our Code and other applicable policies. We refuse to do business with third parties who violate our high standards or detract from the values we strive to create.



### C. Accountability

#### i. General Responsibilities

Because our Code applies to all of us, it is important that we each be aware of our shared responsibilities. When acting on behalf of ChampionX — which includes every ChampionX company, we are expected to:

- **Act with honesty and integrity.**
- **Have a basic understanding** of our Code and Policies, with a detailed understanding of Policies that apply to your job.
- **Seek guidance** with any questions about the application of our Code or Policies.
- **Promptly raise any concern** about possible violations of our Code or Policies, whether by or towards ChampionX employees or a third party agent or contractor. Covering up mistakes generally only makes a situation worse. Instead, errors or problems should immediately be fully disclosed and corrected. In some circumstances, a waiver may be warranted, but raising a concern enables the right people to make the right decisions. All reports must be made in good faith.
- **Cooperate in any ethics-related investigation.** This includes not making false or misleading statements or engaging in otherwise misleading conduct with respect to such investigations. It also includes retaining and preserving all records (documents, emails, electronic data, voicemails, etc.) in your control that may pertain to the investigation.
- **Understand the many options available for raising policy concerns.** See the “Ask Questions and Voice Concerns — How to Seek Guidance and Report Concerns” section of the Code for detailed information about the resources available to you.

#### ii. Management Responsibilities

The obligations of ChampionX managers go beyond those required of others. Managers are expected to:

- **Build and maintain a culture of compliance** by exemplifying ethical conduct in business transactions, communicating that business results are never more important than compliance and encouraging employees to raise their integrity questions and concerns.
- **Prevent compliance problems** by ensuring that policies and procedures, tailored to the particular risk areas faced by a business, are issued and well-communicated, to ensure that employees understand the requirements of our Code, Policies and applicable law.
- **Detect compliance problems** by implementing appropriate control measures in business processes to detect compliance risks and/or violations. Managers are also responsible for ensuring that periodic compliance reviews are conducted to assess the effectiveness of compliance measures and to identify ways of improving them.
- **Respond to compliance problems** by taking prompt corrective action to fix any identified weaknesses in compliance measures, taking appropriate disciplinary action and consulting with ChampionX’s Law Department, and making disclosures to regulators and law enforcement authorities when appropriate.



## Ask Questions and Voice Concerns

### A. How to Seek Guidance and Report Concerns

If you are ever unsure about the right thing to do in a business situation, you should seek guidance. In addition, you have a responsibility to alert your supervisor or any of the resources listed below if you know of or suspect misconduct. Reporting your concerns contributes to our ethical culture and helps ChampionX promptly address situations that left unaddressed could adversely impact employees, other stakeholders, and the Company and its reputation. Failing to properly report a known or suspected violation — or suggesting that another employee not report one — or otherwise withholding relevant and material information concerning a potential violation is itself a violation of our Code and may subject an employee to disciplinary action up to and including termination of employment, where permitted by local law.

Your supervisor is often the person best suited to help you. However, if you are uncomfortable discussing the matter with your supervisor, or his or her response is not adequate, you also may contact:

- A Human Resources representative within your location
- ChampionX's Law Department ([general.counsel@ChampionX.com](mailto:general.counsel@ChampionX.com))
- ChampionX's Corporate Compliance Officer or the Compliance Officer for your region
- ChampionX's Audit Committee, for concerns relating to accounting and auditing matters ([audit.committee@ChampionX.com](mailto:audit.committee@ChampionX.com))
- ChampionX's Global Hotline via telephone or at [www.ChampionX.ethicspoint.com](http://www.ChampionX.ethicspoint.com)

### III. ASK QUESTIONS AN VOICE CONCERNS

---

ChampionX's Global Hotline is available 24 hours a day, 7 days a week and is administered by a third party. You can report a matter through the Hotline by telephone, or by submitting a web-based report, in each case by following the instructions available at

[www.ChampionX.ethicspoint.com](http://www.ChampionX.ethicspoint.com).

A list of the telephone numbers by employment location are on the back cover of this Code.

Alternatively, you may send a note with details of the matter and relevant documents 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 the Company to investigate and appropriately respond to your report.

#### B. Non-Retaliation Policy

The Company, and applicable law, prohibit any form of retaliation against individuals who report suspected illegal or unethical conduct in good faith or who raise concerns regarding possible misconduct in good faith. Making a report in "good faith" means that you have provided all the information you have and you believe it to be true, even if your report turns out to be unsubstantiated. Any person found to have retaliated against another individual for reporting suspected illegal or unethical conduct in good faith will be subject to disciplinary action up to and including termination of employment, where permitted by local law. ChampionX also does not tolerate retaliation arising from your cooperation in a compliance investigation. If you suspect you are being retaliated against, you should contact Human Resources or our Global Hotline. However, submission of reports known to be false may subject an employee to disciplinary action up to and including termination of employment.

#### C. Investigations

We take violations of our Code seriously, including, as appropriate, investigating reports of actual or suspected misconduct fairly, discreetly, and promptly and in a manner that ensures due process for all parties. Unless otherwise required by local law, ChampionX will make reasonable efforts to maintain

any information disclosed as confidential to the extent possible, balanced against its responsibility to investigate reports of misconduct properly and thoroughly. As necessary, communications will be made to others only on a "need to know" basis. An employee's failure to cooperate fully in an investigation constitutes a violation of this Code and will result in disciplinary action up to and including termination of employment, where permitted by local law.

#### D. Consequences of Code Violations

Because our Code is a key component of our compliance program and plays an integral role in safeguarding our ethical culture and reputation, Code violations may result in serious disciplinary action — up to and including termination, where permitted by local law. In appropriate cases, ChampionX may also refer misconduct to the proper authorities for prosecution. This may subject the individuals involved to civil and/or criminal penalties.

#### E. Waivers

If you seek a waiver of a provision of our Code, you should reach out to your local Human Resources department or to the ChampionX Law Department. Waivers of our Code that are applicable to our directors or executive officers must be approved by our Board of Directors (or a designated Board committee) and will be disclosed as and when required by law or the listing standards of the New York Stock Exchange.





## Maintain a Fair and Safe Workplace

### A. Ethical Employment Practices and Non-Discrimination Policy

One of ChampionX's strengths in the marketplace is the diversity of its workforce. We actively seek out skilled, dedicated individuals with integrity from a wide variety of cultural and education backgrounds to contribute to our Company's success and its ethical culture. In keeping with ChampionX Values, it is our goal to foster and sustain this diverse workforce and to promote a workplace that allows each of us the opportunity to develop our full potential to strengthen our Company. By maintaining a diverse workforce, we enrich our culture and surrounding communities, better enable the Company to achieve its goal of being the leader in every market it serves, and create value for our stakeholders. We should view our diversity as a tremendous asset, treat one another with respect, and recognize the value of our respective skills, ideas and backgrounds.

ChampionX is an equal opportunity employer and is committed to maintaining a work environment that is professional and free from discrimination, retaliation, and harassment. ChampionX complies with applicable U.S. federal, state, local and other governing employment laws and strictly prohibits discrimination, retaliation, or harassment with respect to any employee or applicant in matters of hiring, promotion, transfer, disciplinary action, assignments, termination, compensation, fringe benefits, or other terms and conditions of employment. While employees and applicants for employment must be qualified and able to perform essential functions of the job, each person will be accorded equal opportunity to the full extent

provided by U.S. federal, state, local and other governing law and without regard to race, color, religion, disability, national origin, gender, sexual orientation, marital status, age or other characteristics or status protected by U.S. federal, state, local and other governing law. ChampionX is committed to ensuring that decisions involving our employment are based on merit.

It is our policy to provide reasonable accommodations to qualified individuals in all aspects of the employment process in accordance with applicable U.S. federal, state, local and other governing laws. An employee who believes he or she needs a reasonable accommodation for a disability or religious belief or practice should contact your local Human Resources representative or the Law Department.

Furthermore, we abide by all U.S. federal, state, local and other governing wage and hour laws in the locations where we do business. This includes but is not limited to minimum wage requirements, meal and rest periods, overtime pay, record-keeping requirements, and final pay upon separation. ChampionX does not tolerate the employment of children or forced labor, and we refuse to do business with any suppliers or other third parties who do. If any employee becomes aware of any violations of wage and hour laws, policies or work rules, you must immediately report it to your local Human Resources representative or the Law Department.

In addition, ChampionX strictly prohibits and does not tolerate harassment or any behavior (verbal or physical) that creates an intimidating, offensive or demeaning environment or shows hostility or aversion towards an individual related to a person's protected characteristics or protected status under relevant U.S. federal, state, local and other governing laws—whether by or towards an employee, a temporary employee, external vendor, supplier, or contractor. Harassment may be sexual or non-sexual in nature and may include, for example, epithets, slurs, stereotyping, insulting jokes, unwelcome sexual advances or physical contact, offensive or sexually suggestive comments, touching, or requests for sexual favors, or the display or circulation of offensive or degrading graphics or other material. This list is illustrative only as it is not possible to list all the circumstances that would constitute harassment. No form of discriminatory harassment will be tolerated.

ChampionX's policy against harassment also prohibits unwelcome physical or verbal conduct which is of a sexual nature, or directed at an individual because of the individual's sex when: (i) such conduct is explicitly or implicitly a term or condition of the individual's employment; (ii) submission to or rejection of such conduct is used as the basis for employment decisions affecting the

### III. MAINTAIN A FAIR AND SAFE WORKPLACE

---

person who submits to or rejects such conduct; or (iii) the conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creates an intimidating, hostile, or offensive work environment, even if the reporting individual is not the intended target of the harassment.

To keep harassment out of our workplace, we must be sure that our comments and actions are appropriate and respectful. ChampionX's anti-harassment policy applies to all work-related settings and activities, whether inside or outside the workplace, during or outside regular work hours, and includes business trips and business-related social events. ChampionX's property, including but not limited to telephones, copy machines, computers or computer applications (i.e., email or Internet), may not be used to engage in conduct that violates this policy.

If you feel that you have experienced or observed any mistreatment of workers in any of our facilities, any discriminatory, retaliatory or harassing behavior or any unethical employment practices, you should report the incident immediately following the steps set out in the "Ask Questions and Voice Concerns — How to Seek Guidance and Report Concerns" section of the Code.

**Q: Israel and Nora work in close proximity to one another. While they do not have a close working relationship, they are part of the same team. Nora frequently uses vulgar language when she becomes frustrated with her work or is having a bad day — language that Israel finds offensive. Though Israel has kindly asked Nora to tone down her swearing, she waves him off, saying, "This is how I deal with stress. I don't mean anything by it." Her behavior hasn't improved, and Israel is still bothered by the situation. What should his next step be?**

**A:** Israel did the right thing by voicing his concerns to Nora. However, Nora should have respected Israel's feelings and stopped using foul language. Because Nora's behavior did not improve, Israel should escalate the matter to his supervisor or Human Resources representative for further review. While Nora may not intend to offend her coworkers, her actions are inappropriate and ChampionX expects its employees to respect others.

## B. Safety

We each have a responsibility to our Company and to each other to promote a safe, secure workplace for all ChampionX employees. In addition to our standards set out here for promoting safety, you must comply with your local safety policies and procedures, which may vary depending on job requirements and local regulations. It is your responsibility to know and follow the safety policies, procedures and local laws that apply to your job.



We must ensure work areas are secured and free from hazards and workplace violence. We must not use, possess or be under the influence of alcohol, illegal drugs, or any substance that could interfere with safely performing our work. Although alcohol may be served at approved Company functions, if you choose to consume alcohol, it must be done in moderation and not interfere with your ability to drive a vehicle or you must secure alternative transportation.

In addition to the safety of its employees, ChampionX is committed to ensuring the safety and quality of the products and services it provides. We must continuously strive to earn and keep the trust our customers place in the safety and quality of our products and services. To that end, it is the responsibility of each of us to know, understand and comply with all applicable laws and company policies governing product safety and quality. If we do not uphold our commitment to product safety and quality, we

risk losing the trust of our customers, compromising their safety, and tarnishing our reputation.

If you are aware of any violations of safety policies, potential hazards or potentially unsafe products, you should report them immediately following the steps set out in the “Ask Questions and Voice Concerns — How to Seek Guidance and Report Concerns” section of the Code.

**Q: Lindsey works in a manufacturing facility. She works closely with a machine that has many moving parts, but is not an inspector or mechanic. Lindsey notices that a section of her machinery is not working properly and the product that it is turning out does not look the way it should. She is afraid to attempt to fix it herself but knows it was just serviced last week. What should she do?**

**A:** Lindsey should not attempt to correct the problem herself because she is not an inspector or mechanic. She should remain out of possible harm's way and immediately report the suspected defect to her supervisor or an employee authorized to perform work on the machine, so that the machine can be shut down, inspected and properly fixed as soon as possible. She also should tell her supervisor about the non-conforming product that the machine was producing.

## C. Political and Charitable Contributions

ChampionX encourages each of us to give our personal time and funds to support the political candidates and charitable causes of our choice. However, employees should be sensitive to the possibility that participating in outside activities could create a conflict of interest, as discussed further below in the “Conflicts of Interests” section. Note that a conflict of interest may exist if these outside activities (even if the outside activity itself may not be a conflict of interest) are so demanding on an individual's time that they interfere with job performance.

Moreover, we cannot use Company resources or the ChampionX name when making contributions to or involving ourselves in such activities without first obtaining permission from the Law Department. If you ever feel pressured or coerced to do so, report the incident to any of the resources listed in the “Ask Questions and Voice Concerns — How to Seek Guidance and Report Concerns” section of the Code.

### III. MAINTAIN A FAIR AND SAFE WORKPLACE

---

When employees speak out on a public issue, they should be certain to make their opinions known as individuals and avoid any communications or actions that may be perceived as or that actually are communications or actions of ChampionX. Your choice to support political causes or not will have no bearing on your position in our Company, nor your potential for future advancement.



## Protect ChampionX's Assets, Information and Reputation

We must ensure the proper and efficient use of Company property and protect it from theft, damage, loss and misuse. "Company property" includes our physical and intangible assets, such as facilities, equipment, vehicles, software, computers, funds and supplies, as well as our network and computer systems, our power and energy sources, our ideas and innovations, and our confidential information and data. If you believe that anyone is placing the performance or security of Company property at risk, such as through theft, carelessness, waste or violation of the Company's information security policies, you should immediately advise your supervisor or any of the resources listed in the "Ask Questions and Voice Concerns —How to Seek Guidance and Report Concerns" section of the Code.

### A. Technological Equipment

We must use our Company's technological equipment for business purposes and to serve our Company's interests. "Technological equipment" includes, but is not limited to, computer equipment, smart phones, software, operating systems, and network accounts for email and storage media. ChampionX owns or has been licensed to use the technology we use in our businesses, including hardware, software and computer systems. This technology and the information stored on them are critical to our success. Everyone who uses a computer or other technological equipment at ChampionX is responsible for protecting these valuable technology resources.

We are responsible for taking proper security precautions when using our Company's network and information technology systems. Be sure to secure your PCs, laptops, tablets and workstations properly when unattended. If you are sending information considered sensitive or vulnerable, password protect or encrypt the information and follow our Company's internal controls and our Data Security Incident Response Plan

For more information, please see ChampionX's Global Data Privacy Policy, Data Security — Acceptable Use Policy and Incident Response Plan.

If you suspect that any sensitive ChampionX information or systems have been compromised, immediately report your concern to [general.counsel@ChampionX.com](mailto:general.counsel@ChampionX.com).

### **B. Intellectual Property**

Patents, copyrights and trademarks are legal terms that define when an invention, product, written work or name is owned by an individual or company and use of these by others is prohibited without express permission. Ownership rights in patents, copyrights and trademarks are granted on a country-by-country basis.

We may sometimes develop ideas, processes and technology on our Company's behalf or in the scope of our work for our Company that will be protected by patents, copyrights, trademarks or trade secret laws.

This "intellectual property" usually belongs to our Company or our Company's customers, depending on the situation. As required by law and the terms of our employment, each of us agrees to assign the rights to any such intellectual property to the Company or our customers, as appropriate.

Patents, copyrights and trademarks belonging to others may not be used without express permission from the owner. This includes all digital assets (photo, video and multimedia), and references to customer projects.

Never copy or use proprietary data, product drawings, chemical formulations, user manuals, names or software created by someone else without obtaining the required authorization from the author or owner. Never plagiarize or make inappropriate use of articles or materials published by others. In addition, never download, open or use computer software for which there are no software licensing agreements, which could violate copyright laws, or that does not have a business purpose. You should communicate with the IT Department prior to downloading, opening or using any software.

Seek advice from the ChampionX Law Department if you have any questions or concerns regarding intellectual property rights.

### **C. Confidential Information**

ChampionX's proprietary and confidential information is one of our most important assets. "Proprietary and confidential information" generally includes nonpublic information of ChampionX that, if revealed, might benefit our competitors and/or harm ChampionX or its customers. This includes all information, in any format, that we have a legitimate business interest in protecting, including, without limitation, all technical, design, or process data, improvements, chemical formulation, new products, products in development, inventions, models, manuals, know-how, financial data, pricing and cost information, business strategy, development or acquisition plans, marketing plans, project practices, and customer and supplier lists and other information.

You must be vigilant, both on and off the job, in protecting ChampionX's proprietary and confidential information with the utmost care. You may provide this information only to coworkers or outside third parties who have a legitimate business need to know it or where such disclosure is legally mandated under guidance and direction of the Law Department. In all cases, however, be sure to follow the safeguards put in place to protect this information from unintended or deliberate misuse (see ChampionX's Data Security — Acceptable Use Policy for more information on our safeguards). Never discuss this information in a public or other place where outside parties can overhear you.

To the extent mandated by law, nothing in this Code or any other policy shall limit or interfere with the right of an employee to, without notice to or authorization of ChampionX, provide truthful information or documents to, file a charge with or report possible violations of law or regulations to, or participate in investigations or proceedings conducted by the Equal Employment Opportunity Commission, the National Labor Relations Board, the Occupational Safety and Health Administration, the Financial Industry Regulatory Authority, the U.S. Securities and Exchange Commission, or any other self-regulatory organization or any other U.S. federal, state or local governmental agency or commission or other applicable governmental agency or commission. Employees shall also not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that is made: (i) in confidence to a U.S. federal, state or local government official, or other applicable government official, or to an attorney, solely for the purpose of

reporting or investigating a suspected violation of law; (ii) in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal; or (iii) in court proceedings if an employee files a lawsuit for retaliation by an employer for reporting a suspected violation of law, or to the employee's attorney in such lawsuit, provided the employee must file any document containing the trade secret under seal, and the employee may not disclose the trade secret except pursuant to court order. However, employees are not authorized to make disclosures as to which ChampionX may assert protection under the attorney-client privilege or the attorney work product doctrine without prior written consent of the Law Department.

We also are expected to protect one another's personal information, such as home addresses, compensation, health information, government identification numbers and payroll data. It is critical that we follow all applicable privacy, information security and data protection laws that govern the handling of this private and sensitive information.

Our customers, suppliers and other business partners often entrust us with confidential data and information. This information includes business methods, information about acquisitions and divestitures, pricing and marketing data, strategy, computer code, screens, forms, experimental research and information about ChampionX's current, former and prospective customers, suppliers and other business partners. We should never access or share confidential information about a fellow employee or any customer, supplier or other third party without a legitimate business reason and the proper approval to do so.

ChampionX may have joint venture partnerships with companies that might also be our competitors, suppliers or customers in other circumstances. Communication in these joint ventures obviously is critical, but we must take reasonable steps to protect ChampionX's proprietary and confidential information from accidental and inappropriate disclosure or from use outside the joint venture context. We must abide by all ChampionX joint venture agreements that specify and limit access to ChampionX information and systems to certain individuals.

The confidentiality obligations set forth in this section extend beyond the scope and term of our employment or other service with ChampionX and continue even after our employment or other service ends.



**Q: Victoria's job responsibilities require her to travel on a plane on a regular basis. She sometimes begins her workday on the plane by returning calls she may have missed the day before. Is this a problem?**

A: Victoria must take care to only discuss information that is publicly known while she conducts business outside of her office. When making a telephone call in public places, such as restaurants, planes, elevators, or at conferences, make sure you do not discuss confidential information that others may hear.

**Q: At an industry convention, a competitor tells Garth the competitor's industrial capacity for a specific product and asks for ChampionX's capacity. May Garth respond?**

A: He cannot. First, capacity is confidential ChampionX information that should not be disclosed. Second, exchanging capacity information with a competitor may be seen as part of an anti-competitive conspiracy.

### D. Electronic Communications

We are provided with resources such as computers, phones and other physical assets owned by the Company to enable us to conduct Company business. While we are allowed limited personal use of these assets, such personal use should not detract from the performance of our duties or violate any Company policy or applicable law. We may not use these resources to improperly disclose or misuse ChampionX's proprietary and confidential information, conduct illegal activities, access or download obscene or sexually explicit material, or communicate discriminatory, harassing or threatening messages. You have no expectation of personal privacy in connection with the use of these Company resources unless otherwise permitted by local law. ChampionX reserves all rights, to the fullest extent permitted by applicable law, to monitor and review any messages, internet browsing history, and other information sent, received or viewed using Company resources.

You must be careful to protect ChampionX's reputation and business information. For example, follow these guidelines:

- Take care when drafting emails, instant messages and text messages and when using social media platforms
  - remember that others can forward electronic messages and other content without your knowledge or consent and you should assume all content will be read by others beyond the intended recipient
- Remember that electronic documents and information can be retrieved even after you have "deleted" them from your computer's memory
- Ensure that your communications do not violate the law (for example, libel, defamation, harassment or copyright laws) or Company policies (for example, unauthorized disclosure of proprietary and confidential information), including ChampionX's insider trading policy
- When reviewing incoming emails, be careful of email phishing scams and potential malware

For more information, please refer to ChampionX's Global Data Privacy Policy, Data Security — Acceptable Use Policy and Incident Response Plan.

### E. Data Privacy and Protecting Customer, Supplier and Employee Data

We protect personal data through organizational and technical measures including IT security tools, restrictions on access to the data, and physical security measures to help prevent unauthorized or unlawful access, disclosure, loss, destruction or damage. We access and use personal data only for legitimate business purposes and maintain appropriate access controls and use limitations. Only those individuals who need the data to accomplish a business objective should have access to personal data and only for as long as they need it to accomplish the objective.

You are required to follow all applicable privacy, information security and data protection laws that govern the handling and use of personal data, which means any information that, standing alone or in connection with other data, could be used to identify the individual to whom the information relates.

Moreover, we have an obligation to protect the privacy of data that our customers and suppliers share with us. Only ChampionX employees who have a business need should access or use customer or supplier information. When you need to access or use customer or supplier information as part of your job, you should do so only within the limited scope of your business need, taking great care to never jeopardize the security or sensitivity of the information we maintain. This policy applies to the limited number of vendors and other third parties to whom ChampionX authorizes access to supplier or customer information.

**Q: Taylor has been working with ChampionX in the Middle East for the past five years and is moving back to the U. S. for his wife's job. A key customer Taylor has been working with is headquartered in the state that Taylor is moving to and is interested in offering Taylor a job. When speaking with Taylor's supervisor about Taylor's work history and skills, the customer rep asks whether Taylor has had any major health issues recently that have led to him taking time off work. Taylor's supervisor is not aware of any health issues. May Taylor's supervisor respond?**

**A: Taylor's health information is personal data and is protected. Taylor's supervisor should seek guidance before responding.**



Some information is particularly sensitive personal data, such as health information, government identification numbers and compensation data, and is subject to even further protections. Any collection, storage, processing, transfer or sharing of personal data must be done in a manner that protects such data from inadvertent or unauthorized access, use, disclosure, loss, destruction or damage, and any authorized disclosure must be in compliance with local laws. Many of these laws require us to not retain personal data once we no longer have a valid reason for keeping it. Many countries have laws and regulations that restrict the dissemination and use of personal data outside of their borders. ChampionX respects the local legal requirements applicable to personal data.

For more information, please see ChampionX's Global Data Privacy Policy, Data Security Incident Response Plan and Acceptable Use Policy, available on our intranet site.

## **F. Records Management**

We often deal with large quantities of ChampionX documents and records, both paper and electronic. It is important that you know The Company's policy regarding how long you should retain these documents and records, and when and how you should dispose of them. All records that relate to your work are the property of the Company, including those that you may have authored or helped to prepare. If you are notified that documents in your possession are relevant to any pending litigation or an investigation or audit, do not alter, delete or destroy the documents and follow the guidelines set forth in the notification.

### G. Communications with the Public, Investors and the Media

As a global company, ChampionX's message is heard across the world. For this reason, it is important we speak with one voice. To ensure that our communications are always accurate and consistent, a limited number of individuals within the Company are responsible for communicating on our behalf. Therefore, only designated spokespersons within the Company may make certain statements to the public. Should you need assistance with media inquiries, or if you are contacted by a member of the media, please contact ChampionX's Communications Department. Keep in mind that you should never attempt to speak on ChampionX's behalf when not authorized to do so, and should not feel pressured to provide answers to outside inquiries.

We are committed to complying with applicable regulations regarding the selective disclosure of material nonpublic information. The Company has authorized only a small group of individuals to communicate information about the Company to the investment community. If you receive a request for information from analysts, investors or potential investors, forward the request to ChampionX's Investor Relations Department.

Always exercise careful judgment when posting comments on social media, particularly those about our business, customers or business partners. Remember that your communications over social media can have significant public implications for the Company. If you plan to use social media for business-related purposes, you must first obtain authorization from your supervisor.

**Q: Antonio gets a call from a financial reporter who says she understands that ChampionX is going to acquire ABC Corporation. May Antonio tell the reporter off the record that it's not true?**

**A:** No. First, no one should speak for the Company without permission, on or off the record. Second, Antonio may not know the true situation and may be making an untrue statement. Third, SEC rules require that everyone outside the Company has access to important public information at the same time – selective disclosure is only permitted in a narrow range of situations. Call the Director of Communications.



---

# Act in ChampionX's Best Interests

## A. Conflicts of Interest

All employees of ChampionX have a duty of loyalty to ChampionX, and during working hours, all employees are required to devote their time and energies to the service of ChampionX. To remain an ethical company, we must avoid involvement in actual or apparent “conflicts of interest.” A conflict of interest occurs when our personal interests interfere, or appear to interfere, with the interests of ChampionX as a whole or that might give or appear to give an individual a financial or other incentive to act in a manner that is contrary to the best interest of ChampionX. Conflicts of interest can make it difficult for us to perform our jobs objectively and effectively. In general, you must avoid, where possible, any interest, investment or association in which a conflict of interest might arise.

Conflicts of interest can arise not only when personal interests interfere with ChampionX's interests, but also when the interests of a government or government official, ChampionX and/or an individual misalign. “Government official” means an individual who is an employee of a government, including any officer or employee of a government unit or national oil company or other government-owned or government-controlled entity, or any close family member. Government officials also include candidates for political office, political party officials and members of royal families.

We expect you to comply with all laws and regulations covering employing or engaging the services of current or former government employees. We expect you to avoid conflicts of interests in connection with employing or engaging the services of current or former government employees. Our continued success and ability to compete in the marketplace depend on ensuring that we do not hire or work with current or former government employees in a manner that creates a real or perceived conflict of interest.

Some types of conflicts are strictly prohibited, including loans or guarantees of obligations from ChampionX or a third party as a result of your position within our Company.

If you are aware of an actual or apparent conflict of interest, you should immediately advise any of the resources listed in the “Ask Questions and Voice Concerns — How to Seek Guidance and Report

Concerns” section of the Code. Having a conflict of interest is not necessarily a violation of our Code, but failing to disclose it always is.

This Code requires the ethical handling of conflicts that cannot be avoided. Thus, employees should disclose, in writing, all conflicts or potential conflicts. Conflicts are required to be reviewed and approved in advance, in general, (a) by your Human Resources representative (typically with input from ChampionX's Law Department), or (b) for executive officers and directors, by the Board of Directors or Board committee. ChampionX reserves the right to determine, in its sole discretion, the appropriateness of a situation or proposed course of conduct.

Certain examples of circumstances that may create a conflict of interest are provided below, but they are not meant to be all-inclusive (merely illustrative):

### i. Personal Relationships and Financial Interests

At times, we may be in a position to work closely with our family members or those whom we are involved in close personal relationships, which means a romantic or sexual relationship. You must avoid any real or apparent conflict involving personal relationships and/or financial interests, for example, in connection with the employment of a family member or the hiring of a third party that employs a family member or in which you or a family member has a financial interest.

For purposes of this section, a “family member” is any person related to you by blood, marriage or close affinity. This may include your spouse, partner, parents, children, siblings, in-laws and anyone else who resides in your home or with whom you have or develop a romantic relationship.

Indirect holdings of stock via mutual funds are generally not considered a “financial interest” for purposes of this Code.

## V. ACT IN CHAMPIONX'S BEST INTERESTS

---

### ii. Outside Employment

At times, we may wish to seek employment in addition to the work we do for ChampionX. We may not perform work for a governmental or regulatory entity or competitor, customer or supplier of any ChampionX company (if you are not sure if whether an entity would be considered a competitor, customer or supplier of a ChampionX company, seek guidance from your manager or supervisor). We also may not use ChampionX's premises, assets, information or influence for personal gain, or accept special favors as a result of an individual's position with ChampionX from any person or organization with which ChampionX has a current or foreseeable business relationship. Further, we may not accept outside employment if it diminishes our ability to devote the necessary time and attention to our duties. In other words, we may only accept an outside position if it does not create a conflict of interest or interfere with our work for our Company. Any employment outside of ChampionX should be reviewed by your manager for approval.

### iii. Outside Directorships

You must obtain approval from ChampionX's Law Department before agreeing to serve on the board of directors or similar body of a for-profit enterprise outside of ChampionX. Of course, employees will never be permitted to serve as a director, officer or consultant to a competitor of ChampionX. You are also required to notify your supervisor before agreeing to serve on the board of a not-for-profit or community organization although such board service does not require prior approval unless it creates a situation that may pose a conflict of interest with ChampionX. If such a situation arises, you are required to disclose the conflict and seek approval before continuing such service.

Directors are required to comply with ChampionX's Corporate Governance Guidelines with respect to outside directorships, which can be found on our corporate website.

**Q: Caroline wants to invest in a company that makes a part that we buy and use in one of our products. May she do so?**

**A: Maybe:** She should tell her supervisor and consult with the ChampionX Law Department.



### B. Corporate Opportunities

While conducting ChampionX company business, we may come across opportunities that we ourselves would like to pursue. We may not take for ourselves any business opportunities that we discover while using ChampionX company property or information, or through our position with our Company, unless ChampionX determines that it will not pursue the opportunity. Just as we may not personally benefit from such opportunities, we cannot assist anyone else in doing so. Remember, we owe a duty to our Company to advance its legitimate business interests whenever possible. Therefore, we cannot in any way attempt to compete with our Company.

---

### **C. Cooperation with Audits and Investigations**

We are expected to cooperate with any internal or external auditors, as well as government investigators or regulators that request information in connection with any audit or investigation of our Company. We may not attempt to improperly influence any auditor, regulator or investigator reviewing our Company's records, nor may we encourage anyone else to do so. If a government investigator asks you to take part in inspections or interviews, or requests documents or information, you should immediately notify your supervisor and the ChampionX Law Department, and follow this Code and company policy.

### **D. Investments**

If you or a family member owns more than one percent (1%) of the outstanding stock of any ChampionX competitor, supplier or customer, you must disclose that ownership to the Company. Even a minority ownership in a ChampionX competitor, supplier, or customer can be a conflict of interest. Under ChampionX policy, the business or financial interest of family members are considered your financial interests as well.



## Comply with Applicable Laws, Rules and Regulations

Because of our global presence, it is important to recognize that laws, regulations, business practices and customs can vary greatly from one country to the next.

If a situation arises where our Code, Company policies, or the laws of any country are in conflict, you should seek guidance from your supervisor or any of the resources listed in the “Ask Questions and Voice Concerns — How to Seek Guidance and Report Concerns” section of our Code before taking action.

### A. Financial Integrity

One of the Company’s fundamental goals is to maintain accurate business and financial records. This enables the Company to effectively manage its activities and to ensure that its financial and other disclosures to the public, and its disclosures to governments around the world, are complete, accurate and timely. While it may not always be apparent that the information we generate has an impact on the Company’s financial records, we each play a role in ensuring this important goal is fulfilled.

Therefore, every piece of data or information that we submit in Company records. For example, personnel, time, expense and safety records — must be absolutely honest, accurate and complete. We must follow our Company’s system of internal controls and all applicable accounting requirements when recording this data. We also must submit appropriate contract documentation at all times.

Our commitment to following the Company’s mission and purpose as well as our Code requires that we engage only in legitimate and authorized business transactions. To do so, we may not engage in any of the following activities:

- Making false representations, whether orally or in writing
- Hiding Company funds
- Mischaracterizing Company transactions
- Creating undisclosed or unrecorded bank accounts
- Knowingly allowing similar illegal activities to occur

### i. Accurate Business Records

The Company's books, records, accounts and financial statements must accurately and fairly reflect the assets, liabilities, revenues and expenses of the Company, and conform to applicable legal requirements and accounting standards. Employees may not make any false statements, misleading or artificial entries, or material omissions or misrepresentations in any of the Company's books, financial records, or other documents or communications. All financial transactions must be accurately documented in reasonable detail and recorded in the Company's accounting records. Accruals shall be supported by appropriate documentation and based upon good faith estimates.

### ii. Accounting Controls

The Company has policies, procedures and practices in place to ensure that adequate internal controls exist over financial reporting, assets are properly safeguarded, transactions are properly authorized, transactions are properly recorded and reported and financial reporting is accurate and complete. The Company expects full compliance by employees at all levels with ChampionX's internal controls and accounting policies.

### iii. Financial Disclosures

Disclosures made in the Company's public communications and communications with investors must be complete, fair, accurate, timely and understandable. All employees who are involved in the Company's disclosure process, including all senior financial personnel and all employees with supervisory responsibilities with respect to the Company's public disclosure documents, are expected to act in furtherance of this requirement. In particular, these individuals are required to be familiar with and to comply with all applicable disclosure requirements and are prohibited from knowingly misrepresenting, omitting or causing others to misrepresent or omit, material facts about the Company to others, whether inside or outside the Company.

### iv. Anti-Money Laundering

ChampionX prohibits "money laundering." Money laundering is the process by which individuals or entities move criminal funds through the financial system in order to hide traces of their criminal origin, or otherwise try to make these funds look legitimate.



We need to be on the lookout for irregularities in the way payments are made. If you see any of the following, you should report the matter immediately:

- Payments made in currencies other than those specified in the invoice
- Attempts to make payments in cash or a cash equivalent
- Payments made by or to a third party not involved in the contract or an account other than the normal business relationship account
- Requests or attempts to make payments for each invoice or group of invoices through multiple forms of payment
- Requests to make an overpayment

### v. Candor with Management and Auditors

If you notice any accounting or auditing irregularities, or incidents of fraud by individuals responsible for our Company's accounting or financial reporting or others, you should immediately report your concern as provided in the "Ask Questions and Voice Concerns — How to Seek Guidance and Report Concerns" section of the Code. Furthermore, employees should give complete and accurate information in response to any inquiry from the Company's management, internal auditors or independent auditor. Concealment of information in any manner will not be tolerated. See also the "Act in ChampionX's Best Interests — Cooperation with Audits and Investigations" section of our Code. Please keep in mind that you are protected from retaliation when making a good faith report

### B. Inside Information

Some of us are likely to be exposed to inside information about our Company, customers or business partners through our work with ChampionX. "Inside information" is material information that is not available to the public. Material information is any information that a reasonable investor would likely consider important in deciding whether to buy, sell or hold securities of a company (for example, stocks, bonds or options). Information is considered nonpublic if it has not been adequately disclosed to the public. Information is considered adequately disclosed when it is made generally available to investors, for example, through a press release, a webcast available to the public, or a filing with the U.S. Securities and Exchange Commission, and investors have had a reasonable period to react to the information. You cannot buy or sell the securities of the Company or of any other company with which we do business if you possess inside information. You also cannot give inside information to others who might use it to buy or sell securities.

Examples of inside information include:

- Financial information or data such as earnings or forecasts
- Winning or losing a significant new award, an existing contract, or business
- Financial plans
- Changes in senior management or Board of Directors
- The existence of, or significant or expected developments in, litigation or government investigations
- Impending bankruptcy or receivership
- Significant environmental issuers
- Significant curtailment or expansion of operations
- Mergers, acquisitions or divestitures
- Significant cybersecurity incidents or breaches
- Changes in our outside auditor or notification from our auditors regarding the reliability of our financial statements
- Information about stock repurchase or dividends

Remember that even information about events or actions that are not certain to happen, such as the possible new award of a contract or signing of an acquisition agreement, can be considered inside information.

If you have questions about these rules, please contact the ChampionX Law Department before purchasing or selling securities. You can also find additional information in ChampionX's Securities Trading Policy, which can be found on our intranet site.

### C. Fair Dealing and Competition

#### i. Fair Dealing

We succeed by competing fairly. We deal truthfully with our customers and business partners, without manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice. We do not make false or misleading statements about our competitors or their products or services.

### ii. Gathering Competitive Information

Our goal to compete ethically and effectively in the marketplace extends to the gathering of competitive information. In general, it is appropriate to gather intelligence about other companies from public sources, such as their websites, published articles, price bulletins, advertisements, brochures, public presentations, public annual reports or published sales materials. We also use information gained from conversations with customers, as long as it is not confidential, and we can obtain and use information from reputable advisors and consultants with appropriate assurances that it was properly obtained

However, even the appearance of improper information gathering could be problematic for ChampionX and the individual(s) involved. Therefore, you must never use, or ask a third party to use, unlawful or unethical means — such as misrepresentation, deception, theft, spying or bribery — to obtain competitive information. If you receive any such information you believe was collected in such a manner, you should consult your supervisor or the ChampionX Law Department.

At times, new ChampionX employees will possess business information about our customers, suppliers or competitors due to their work with a prior employer. Such information may include:

- Specific technical, design, chemical formulation, or process data
- Trade secrets or confidential information
- Software licensed to the former employer
- Anything marked or intended to be confidential or proprietary and that is not publicly available

**Q: Max has been asked by his manager to collect information about a competitor. Can he hire a third party to use methods that Max cannot use because they may be illegal?**

**A:** No. It is ChampionX policy not to employ a third party to do anything that would be improper for ChampionX to do itself.

Always respect the confidentiality of this information, and never ask a new employee to reveal confidential or proprietary information about his or her former employer, or otherwise violate a confidentiality agreement with his or her former employer. If the new employee offers to reveal such information, you must refuse the offer.

Proactive steps should be taken to ensure new employees understand this policy, do not bring such information to our Company upon employment and are recused from discussions, information-sharing and decision-making as appropriate.

### iii. Antitrust and Competition Laws

We are subject to various antitrust and competition laws – also known as anti-monopoly, fair trade or cartel laws – in the countries where we do business. These laws are designed to promote fair competition in the marketplace for the benefit of customers.

Robust competition can benefit consumers by enabling them to buy goods and services at lower prices or by making available better quality goods and services, in part through competition in research and development.

**Q: Lucas received a phone call from a ChampionX competitor. The caller told him that unless Lucas stopped making sales calls in her market, she would make negative public remarks about ChampionX that might threaten our business. Lucas doesn't want to cause ChampionX any harm in the public eye. What should he do?**

**A:** Lucas should tell the competitor that the call she is making is illegal and hang up immediately. He should report the call to his supervisor and the ChampionX Law Department. The competitor is attempting to divide the market, which violates competition laws and our Code. Always be cautious when dealing with competitors and consult with your supervisor and the ChampionX Law Department whenever you have questions about taking the appropriate action.

In general, competition laws prohibit activities between competitors that restrict competition. For example, they 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. Many countries have competition laws and the specific regulations may vary from country to country. For example, some countries' competition laws may regulate activities such as distribution agreements, rebates, discounts, or territorial restrictions on resellers.

## VI. COMPLY WITH APPLICABLE LAWS, RULES AND REGULATIONS

---

Many countries' laws, including those of the U.S., may apply even when you are doing business in other countries. It is your responsibility to know and adhere to all the fair competition laws that apply to the work you do on behalf of ChampionX.

During your work at ChampionX, you may be required to attend trade association or industry conferences. In these situations, you must exercise particular caution and must not discuss anti-competitive topics with a competitor. If a competitor attempts to bring up a prohibited topic, you should stop the conversation immediately. You should then speak with your supervisor or call the ChampionX Law Department to report the situation and seek further advice.



### D. Global Trade Compliance

Our Company's global reach demands that we exercise appropriate due diligence as to the third parties with which we do business and that we comply with all international laws regulating trade, as well as local import and export laws and regulations. These laws are complex and can change quickly as governments address new political or security issues. In general, they govern the export, import or transfer of certain controlled products and technology by ChampionX. If your job involves the transportation or use of products or technology subject to export control laws or importation regulations, it is your responsibility to know and follow all such laws and regulations, as well as related Company policies and procedures, including the ChampionX Global Trade Compliance Policy which can be found on our intranet site. The consequences for violating trade control laws and regulations are severe — both for our Company and for the individuals involved. Therefore, if you have any questions about exports, re-exports or imports, please contact the ChampionX Law Department or Global Trade Compliance Department immediately.

**Q: Jenny's team makes some valves that are export restricted under U.S. law. She has a new employee who is working in the U.S. under a visa that she would like to assign to work in the area that designs these valves. Can she?**

**A:** Before doing so, Jenny should check with the Global Trade Compliance Department or with the ChampionX Law Department. If you have U.S. export controlled products at your location, access to data about those products (drawings, test results, bills of material) and to the products themselves may be restricted under U.S. law. For example, sharing export controlled data with a foreign national may be a "deemed export" even if that person is looking at the parts or test results in your plant in the U.S. Many other countries also have export control laws, including the EU, Japan and Australia, as examples. The types of products which may be export controlled are those with military end-uses, dual (military and civilian) uses, or where the products contain advanced technologies or encryption.



In addition, the United States and other countries where we do business use embargoes and sanctions to further foreign policy and national security objectives. These embargoes and sanctions prohibit or severely restrict our direct or indirect dealings with certain countries. They may also restrict our dealings with individuals or with companies controlled by the government. You are responsible for obtaining a legal review of any transaction involving any country subject to U.S. embargoes or sanctions to determine whether U.S. or other laws prohibit the proposed transaction. In addition, all transactions must be screened to ensure that they do not involve any prohibited parties, destinations or end-uses.

You can find additional information in ChampionX Sensitive Countries and Persons Policy which can be found on our intranet site.

**Q: Dylan is trying to figure out if his customer is a company that is on one of the lists that we are prohibited from doing business with. How can he do so?**

A: ChampionX has access to online resources that keep up with the restricted and prohibited party lists for the U.S., EU, and other countries who publish lists.

## VI. COMPLY WITH APPLICABLE LAWS, RULES AND REGULATIONS

Our Company complies with U.S. laws that prohibit cooperating in economic boycotts of certain other countries. In addition, we are required to report to the U.S. government the receipt of any requests to support such boycotts or to provide information to verify compliance with such boycotts. Therefore, if you believe you have received a boycott request or have any questions about boycott activities, it is important that you notify your supervisor or the ChampionX Law Department immediately.

**Q: What boycotts are prohibited under U.S. law and how do I know whether my customer is asking me to support a boycott?**

A: One example of a common boycott requirement that you may see in documents from customers located in the Middle East is a requirement to avoid using ships that use Israeli ports, or you may see language that asks you to certify that the products you are supplying do not contain parts or technologies that originate in Israel. The language of what is allowed under the law and what is prohibited is very complex. Contact the ChampionX Law Department if you see language in your customer documents — generally in purchase orders or letters of credit - which ask you to make specific representations about Israeli content or contacts.

### E. Anti-Bribery and Anti-Corruption

Offering or paying bribes or other improper payments or things of value to win business or obtain an unfair advantage is unacceptable no matter where we are doing business, even if business is lost or difficulties are encountered as a result (for example, delays in obtaining permits or licenses). Offering, paying, accepting or soliciting bribes and other corrupt payments may violate multiple anti-corruption laws and expose individuals and the Company to civil and criminal liability and severe penalties. Violations could also result in the loss of future government contracts. Almost all countries have laws that prohibit bribery, corruption and kickbacks. Some of these laws — such as the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act — apply to activities outside the countries' borders. Our Company will not tolerate corruption, extortion or embezzlement in any form, whether offered, paid, accepted or solicited directly by our employees or indirectly through third parties.

A “bribe” is anything of value offered, promised or given directly or indirectly to improperly influence the actions of a third party in order to obtain or retain business or gain a business advantage. Bribes may include money in any form (including cash equivalents), gifts, travel or other expenses, entertainment or other hospitality, below-market loans, discounts, favors, business or employment opportunities, political or charitable contributions, or any direct or indirect benefit or consideration.

It is our duty to know and follow local and other applicable anti-corruption laws that apply in all countries where we do business. For additional information, refer to our Global Anti-Corruption Policy and Guidelines, which can be found on our intranet site.



## VI. COMPLY WITH APPLICABLE LAWS, RULES AND REGULATIONS



### i. Gifts, Entertainment and Hospitality

The offering or receiving of gifts, entertainment and hospitality can be an excellent way to foster positive business relationships. However, there are strict rules governing these practices to ensure they are never given or received as an improper incentive or bribe.

In addition, we must not create or give the appearance of a conflict of interest when engaging in these business practices. Therefore, it is important to understand and abide by our Code, Company policy and the law when offering or accepting any gifts, favors, meals, entertainment or hospitality from customers, suppliers or other business partners or their family members.

Employees may not give gifts in connection with ChampionX business except in accordance with the Company's policies and procedures, which should require that each of the following circumstances are met: (i) the gift is appropriate under legitimate and generally accepted local law or custom; (ii) the gift is permitted by the rules of the recipient's employer; (iii) the item is of nominal value; and (iv) the expenses related to the gift are supported by receipts, approved in accordance with ChampionX policy, and accurately recorded in ChampionX's books and records. All other gifts must be approved in advance by the General Counsel or the Corporate Compliance Officer or their designees. Please see the Global Anti-Corruption Policy and Guidelines, which can be found on our intranet site, for specific guidance in this area.

**Q: Ella is responsible for negotiating contracts with our vendors. During the holiday season, a sales representative for a potential vendor invites Ella to a lavish holiday party held at an expensive resort. The sales representative jokes that this is a "fun" event and no business talk is allowed. Can Ella attend?**

**A:** No, Ella shouldn't accept the invitation. The party is elaborate and outside the normal course of business, since talk about business is not on the agenda. In addition, if Ella attends the party and then finalizes a contract with that vendor, it may appear as if the invitation was intended to sway her business decisions.

**Q: At an offsite meeting, Tralfaz sees a customer he has not seen in several months and invites her to lunch to catch up. The customer accepts, and Tralfaz pays for the meal. Are his actions okay?**

**A:** Occasional meals ordinarily are acceptable, so long as providing the meal does not improperly influence a business decision or give the appearance of doing so. Evaluate the setting and cost of the meal, the frequency of such meals with the customer, whether the customer is a government official, and whether you have other potential business pending with the customer.

## ii. Interacting with Governments

It also is important to understand and abide by our Code, Company policy and the law when offering gifts, entertainment and hospitalities to government officials and employees of government-owned or government-controlled entities. For additional information, refer to our Global Anti-Corruption Policy and Guidelines which can be found on our intranet site.

When working with potential or existing government customers, it is critical that we abide by the various laws, regulations and procedures that apply to government contract work. These rules are often much more strict and complex than those that govern our sales to commercial customers. If your work involves marketing or selling to, contracting with, or working on projects for a government agency, it is your responsibility to know and follow the particular rules that apply to those customers and their projects. Talk to your supervisor or the ChampionX Law Department if you have any questions or concerns about these rules or how they apply to the work you do.



## F. 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, our employees and the communities in which we operate. You are required to comply with all applicable environmental laws, regulations and standards and minimize any adverse impact on the environment. You must also endeavor to conserve natural resources and energy, and reduce or eliminate waste and the use of hazardous substances.

To this end, if you use or come into contact with chemicals or hazardous substances (e.g., product samples), you must refer to Safety Data Sheets (SDS) which contain typical disposal information for our products and that guidance should be adhered to at all times. Should you have additional questions with how to dispose of chemicals or hazardous substances, please contact your local/regional Safety, Health and Environment representative.