

The background of the slide is a photograph of an oil field at dusk or dawn. Several tall drilling rigs are visible against a dark blue sky. The ground is a mix of dirt and sparse vegetation. In the foreground, there are some industrial structures and vehicles.

# Code of Conduct of «Kaz M-I» LLP



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## Every one of us is responsible for knowing, upholding – and representing – this Code

### What We Expect of Each Other

Integrity can take years to build, but it can be lost in a moment. We need to be purposeful and thoughtful about how we represent Kaz M-I to others.

- Live our purpose, , and behaviors every day
- Know and follow the Code
- Aim to do the right thing, the first time, every time
- Don't engage in actions unless you are sure they are ethical
- Speak up: ask questions and raise concerns

### When issues arise

We deliver high-quality technology and services, and we always follow the laws of the different countries in which we work. Sometimes these laws vary from place to place and could even conflict. This Code is your guide to help you navigate and understand what is expected of you. Our Code and the Kaz M-I internal requirements represent the standard of business care expected everywhere we work, from everyone who works for Kaz M-I.

### Integrity is a Team Effort

Whether you are a senior manager, or this is your first week at Kaz M-I, you are empowered to openly discuss and raise questions about ethics and compliance. Take pride in performing with integrity and raise concerns about conduct that doesn't represent our values. Remember that achieving integrity together is a team effort – we must all encourage each other to meet our targets with integrity and never pressure our colleagues into ethical short cuts.

This Code and its underlying principles apply to all Kaz M-I employees and contractors.

We also expect our vendors, suppliers, agents, and other third-party business partners working on our behalf to comply with our Code and uphold our high ethical standards.



#### Ethics

If it cannot be done ethically, we will not do it.



#### Teamwork

We work together with integrity.



#### Speak Up

We are all empowered to raise ethical concerns.

# Our Values Drive Our Culture Forward

Customer focused – Solution Driven, led by performance and value generation

Our culture is the foundation of everything we do, and it starts with our values



## We Value People

Because our exceptional and diverse people are the pulse and spirit of who we are.

### Our Behaviors

- We are safe
- We are inclusive
- We respect work and personal life



## We Value our Clients

Because our passion for exploring enables us to solve the Client challenges.

### Our Behaviors

- We are pioneers
- We innovate together
- We experiment, learn, and grow



## We Value Solutions Driving Performance

Because together we deliver outstanding results to build a sustainable future.

### Our Behaviors

- We act with integrity
- We deliver today and tomorrow
- We focus on what matters most

## Integrity in Action

Words are important, but our behaviors provide the best evidence of our shared values and integrity.



# We Value People

## We Empower Everyone to Succeed

- Because our exceptional and diverse people are the pulse and spirit of who we are.
- We demonstrate our ambition and commitment through what we value and how we behave.



# Working the Safe Way Every Day



Nothing is more important than the health and safety of our people and others affected by our activities. We believe that everyone has the right to go home every day to their family safe and healthy. If anything – a job, procedure, project, travel – cannot be done safely and securely, we will not do it.

## We deliver on this promise through five key principles:

### We Do Not Compromise

We do not compromise our Health, Safety, and Environment (HSE) principles for performance. We demonstrate visible leadership in the safety and care we have for one another, the environment, our assets, and the communities where we live and work.

### We Speak Up and Stop the Job

Each of us has the authority and responsibility to stop, or not start, any work activity if hazards or risks pose a threat to health, safety, or the environment. When an issue is raised, we listen and respond

### Integrity in Action

You are expected to stop the job and speak up if you believe it is unsafe to proceed.

### We Support Employees

Our vision is to have the healthiest and happiest employees in our industry. We aim for our employees and their families to be healthy and feel empowered in and out of the workplace. We focus on preventive care that includes mental health and emotional wellbeing.

### We Plan Ahead

We embed health and wellbeing, safety, security, and environmental considerations in business planning and decision making.

### We Continuously Improve

We will set, measure, and review our HSE objectives and targets to drive continuous improvement, and be transparent and open in reporting our HSE performance. This is how we earn the trust and respect of our customers and stakeholders.



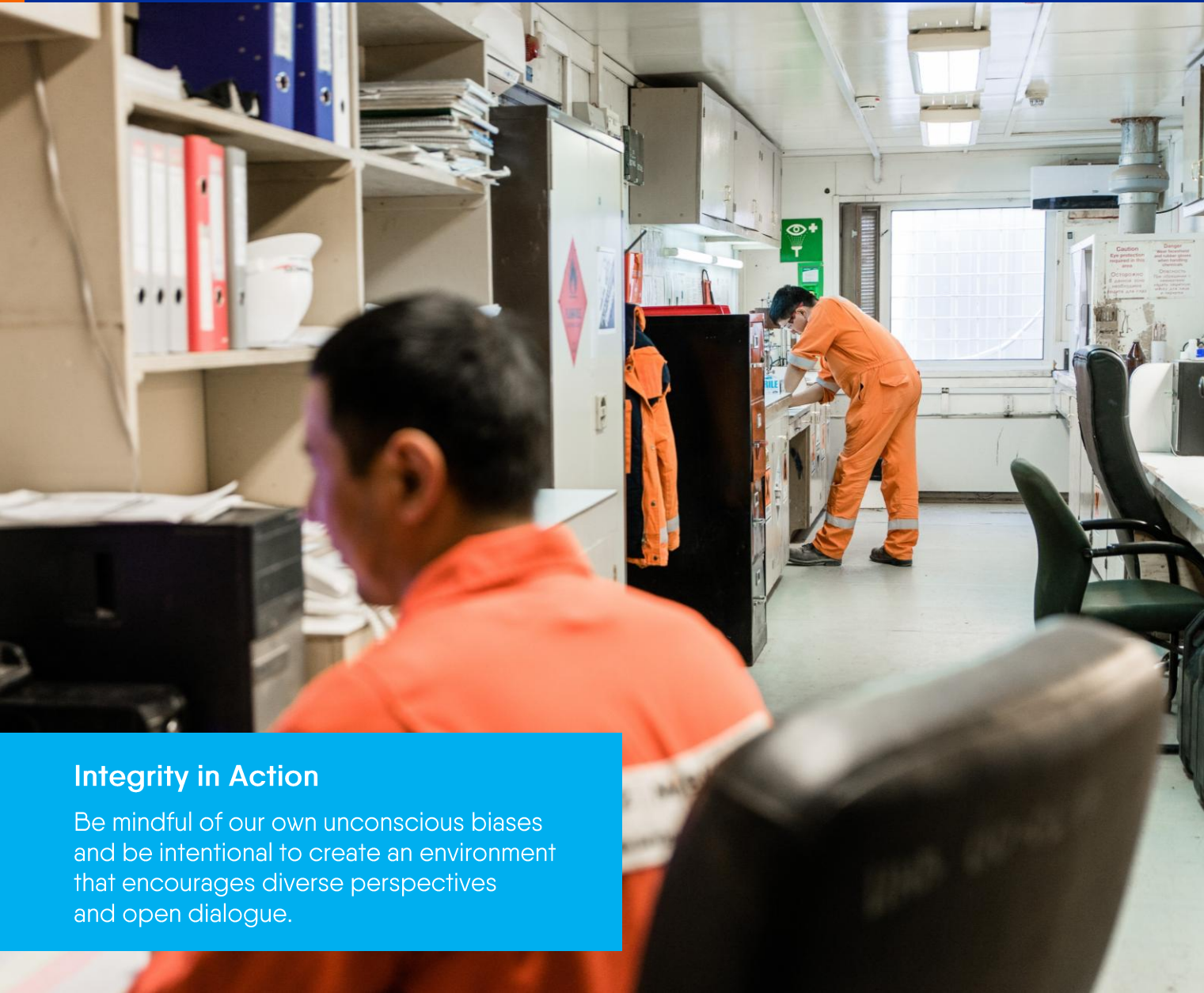
To learn more about our HSE principles, please visit our [SharePoint IMS module](#)

### Additional Resources

- Driving Policy
- Quality, Health, Safety, and Environmental (QHSE) Policy
- Substance hazardous to health Policy
- Alcohol, drugs and contraband Policy



# Respecting One Another and Our Differences



## Integrity in Action

Be mindful of our own unconscious biases and be intentional to create an environment that encourages diverse perspectives and open dialogue.

Respect in the workplace is not optional – it is the key to our success. The diversity of our people is essential to the unique culture of Kaz M-I, propelling our success, uniting us, and differentiating us from other companies. We recognize that by respecting and promoting diversity, we can better serve the community in which we operate.

We recognize that different backgrounds, perspectives, and experiences are the foundation of innovative solutions that benefit our company and communities sustainably. Our goal is to create a diverse, inclusive culture that respects the differences among our people and values their identity – a culture where we can work flexibly to thrive both personally and professionally.

## Additional Resources

- HR Policy
- Policy for labor relations
- Internal labor Procedure

# Protecting Against Harassment and Discrimination



Kaz M-I does not tolerate discrimination of any kind and we forbid any form of harassing behavior among our employees, or by or against any of our customers, or other third parties with whom we engage.

Acts of sexual harassment, threats of violence, and aggressive conduct are all prohibited. Especially for managers, bullying and intimidation are never acceptable.

Kaz M-I prohibits all forms of discrimination, including discrimination in employment, employment-related decisions, and business dealings. Discrimination includes any prejudicial treatment due to an individual's race, color, ancestry, age, sex, sexual orientation, gender identity or expression, religion, disability, ethnicity, national origin, veteran status, marital status, pregnancy, or any other representation category that may be recognized locally.



## Integrity in Action

Speak up if you see harassment taking place. We will not tolerate any form of retaliation against employees who raise concerns in good faith.

General harassment can include disrespectful, insulting, or inappropriate language, shouting, bullying, or offensive jokes.

### Sexual harassment can include:

- Unwelcome physical contact, sexual advances, or propositions
- Career or employment decisions based on acceptance or rejection of sexual advances
- Verbal conduct of a sexual nature
- Images or material displayed at work or shared with a colleague that contain sexualized or objectifying content

## Additional Resources

- Policy against abuse sexual harassment
- Zero Tolerance Policy



# Respecting Human Rights and Treating the Communities We Work with Fairly



We conduct business in a manner that preserves and respects human dignity, and we demand the same from all our employees, contractors, suppliers, agents, and business partners.

We prohibit any use or contracting, directly or indirectly, of slavery, human trafficking, child labor, and any form of forced labor.

We respect the rights of local communities and work with all our stakeholders to create shared values – aligning our roles and responsibilities to uphold and promote human rights.

Our focus is on creating in-country value and promoting sustainable development. We are committed to working with our local communities and stakeholders to:

- Identify, prevent, mitigate, and resolve social risks and impacts
- Optimize employment and contracting opportunities for local communities
- Ensure that community concerns are taken seriously
- Adhere to all labor, employment, and immigration laws in countries in which we operate
- Promote freedom of association
- Provide access to effective remedies when our activities may contribute to adverse human rights impacts Kaz M-I maintains political neutrality – we do not lobby, and we do not offer financial support to politicians or campaigns. This allows us to be more effective at working with our local communities and stakeholders.

## Additional Resources

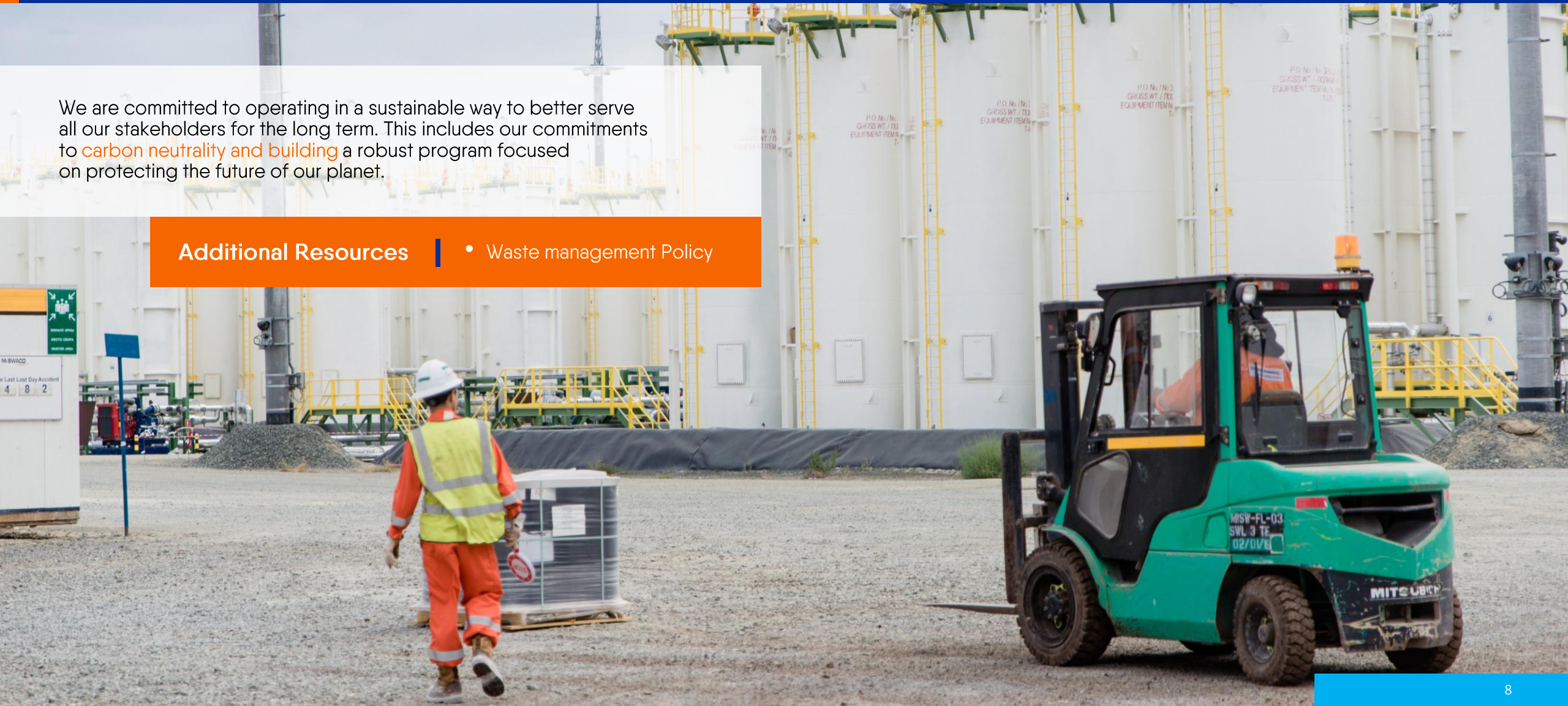
- Grievance Policy
- Policy of the migration legislation compliance

# Promoting Sustainability and Protecting Our Environment

We are committed to operating in a sustainable way to better serve all our stakeholders for the long term. This includes our commitments to **carbon neutrality** and **building** a robust program focused on protecting the future of our planet.

## Additional Resources

- Waste management Policy





# Protecting Data Privacy

## Personal data privacy and protection is a foundational element of treating our employees and other data subjects with respect



We protect the privacy of personal data entrusted to us in compliance with applicable data privacy laws.

- We collect and use personal data only as needed for lawful business purposes and keep it only as long as necessary for that purpose
- We are transparent about our collection and use of personal data as explained in privacy notices such as the Kaz M-I Policy for confidentiality and information security and privacy notices provided at the point of collection
- We share personal data with service providers as part of our business operations only if there is a lawful basis to do so and if they contractually commit to protecting the personal data

### Integrity in Action

To help us protect personal information, you must always:

- Protect all personal data
- Never share unprotected documents containing personal data of employees
- Immediately report any suspected accidental exposure or unauthorized access to personal data

### Additional Resources

- Policy for confidentiality and information security
- Policy of intellectual Property



# We Value Technology

## We Create Solutions That Drive Change

Because our passion for exploring enables us to solve the energy challenges.

- We invest for the long term and learn from experimenting in the short term.
- Our technology sets us apart and helps us disrupt the energy industry.





# Protecting Kaz M-I's Intellectual Property and Confidential Information

Kaz M-I's confidential information and intellectual property are important assets. They represent our collective hard work, innovation, and competitive advantage. We also respect and protect the intellectual property and confidential information of our business partners and collaborators.

We should treat all Kaz M-I information, including business plans, strategy, sales data, software code, technical developments, and intellectual property as confidential until publicly disclosed.

## To protect our innovations, we must:



Avoid disclosure of confidential information to anyone outside Kaz M-I until an appropriate confidentiality agreement is in place



Disclose innovative ideas to our Intellectual Property department before sharing them externally so we can decide how best to protect our rights



Prevent sharing strategies or other business information (including pricing information or targeted bids) with competitors or other third parties

## Integrity in Action

When speaking to third parties at industry events, remember to never share any confidential information. Confidential information includes not only technical information, but also business and financial information.

## Additional Resources

- Policy for intellectual property
- Policy for non-disclosure agreement

# Securing Our Data and Digital Performance

## Additional Resources

- Confidentiality and Information Security Policy
- Information Security Top-12 Practices

Data drives our digital performance, and we all have a role to play in protecting against cyber threats. If you become aware of a cyber incident or similar theft, misappropriation, or misuse of our data, information, or network access, then you must **speak up** immediately. The sooner you report, the faster we can act.

Cyber threats are always evolving – from hacking to phishing to social engineering to business email compromise.

Stay vigilant to potential cyber threats, stay up to date on your awareness training, and implement all best practices, including software and security updates.

## Additional Resources

- IT Policy
- Policy for the conflict of interests



# Respecting Trade Controls

Kaz M-I develops, manufactures, and ships tools, products, and equipment throughout Kaz M-I's business markets to support our operations. We also source materials from third party suppliers.

Many countries impose customs taxes or duties on imports, and some countries may impose further limits or restrictions on the types of products that can be exported or imported.

Kaz M-I is committed to following all relevant international trade control and customs regulations.

For our trade control and logistics teams to arrange the successful movement of goods across our company, you must provide the logistics and trade control teams all accurate information, including:



Type of products



Intended customer



Product value



Intended destination

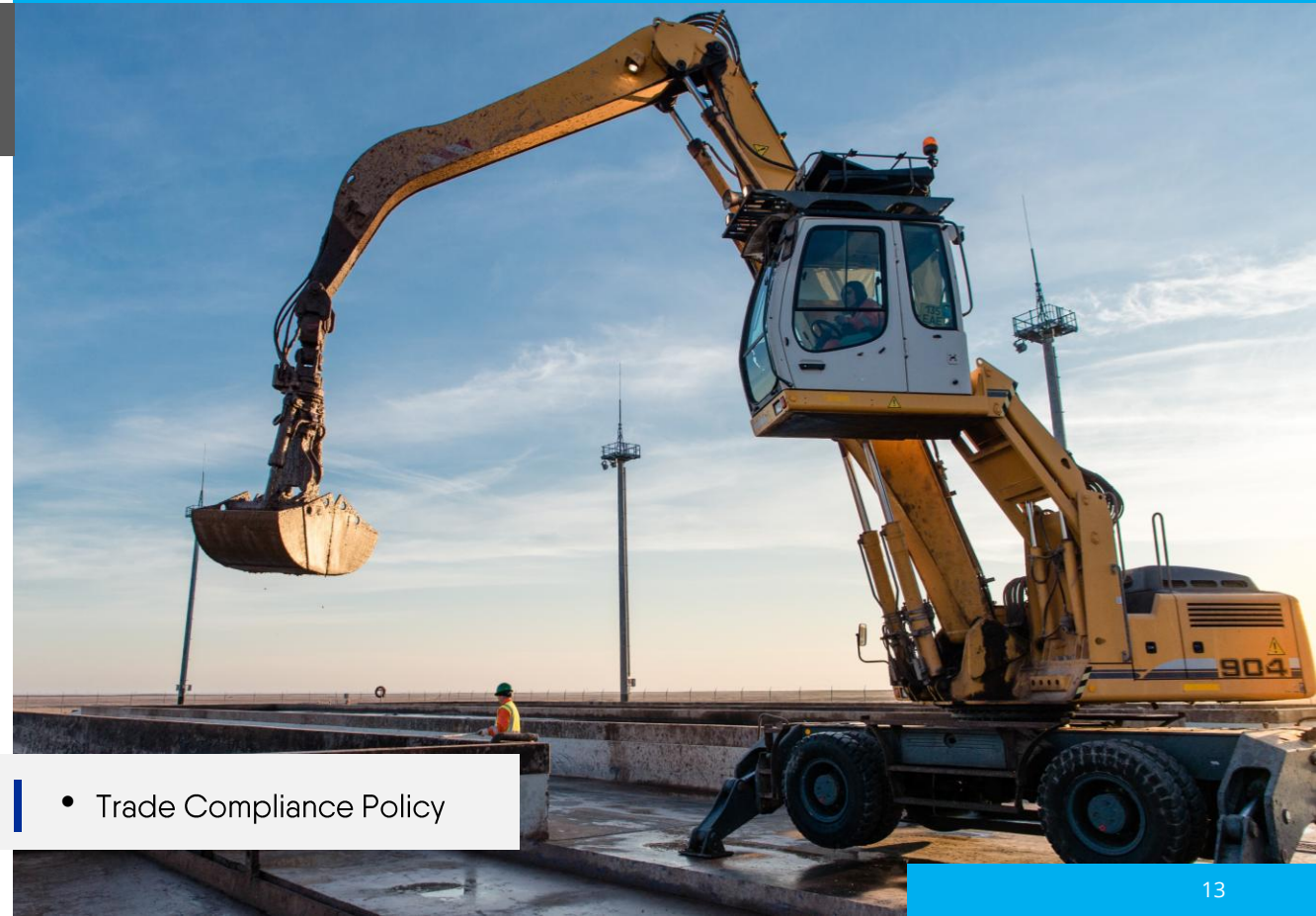


Intended use

## Integrity in Action

We do not import, export, or move goods in any way (including hand carrying items) without all required declarations, permits, and licenses.

It is also important to verify the nationalities of employees, third parties, and visitors before providing access to Kaz M-I product development and manufacturing facilities. This helps us comply with sanctions and trade controls.



## Additional Resources

- [Trade Compliance Policy](#)

# We Value Performance

We Lead the Energy Industry Forward  
Because together we deliver outstanding  
results to build a sustainable future.

Performance without integrity will never have a place in our company. We have always been trained to recognize the boundaries, and to have the courage to act honestly and responsibly anywhere in the world where we work.

We are known by our integrity, and this remains the compass that guides how we act.





# Protecting Kaz M-I with Zero Tolerance for Corruption

Kaz M-I wins business the right way.

We never offer, promise, give, or accept money or anything of value to or from third parties in exchange for an improper business advantage – and we must ensure the same level of integrity from those acting on our behalf.

We only work with suppliers, vendors, agents, business partners, and other external third parties that share our commitment to doing business ethically and in compliance with our Code and any applicable laws.

You must ensure all procedures have been followed, all relevant information has been obtained, and all approvals have been secured before any third party is instructed to act on our behalf.

## Integrity in Action

We win business based on the quality of our pricing, service, technology, and availability.

We do not tolerate corruption of any kind, and we expect the same from our contractors, suppliers, partners, and agents. Proper due diligence is required.

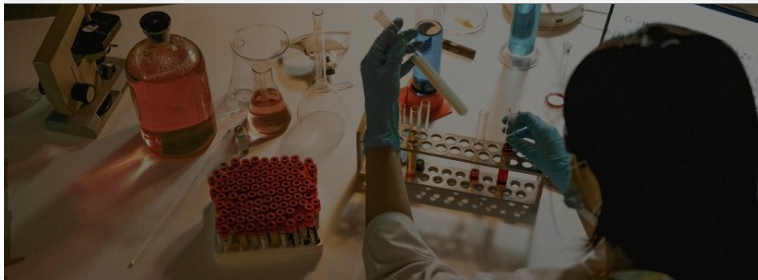
## Additional Resources

- Zero Tolerance Policy
- Agent Management Procedure
- Anticorruption Policy
- Policy of business ethics
- Purchasing Policy
- Policy for antimonopoly legislation



# Avoiding and Disclosing Conflicts of Interest

**We want** all our people to be able to succeed both inside and outside of Kaz M-I. But we should never use our positions at Kaz M-I for personal gain outside of our employment relationships.



**Conflicts of interest** can raise questions and undermine trust. To ensure transparency, and to protect your reputation, any actual or potential conflict of interest must be disclosed to your manager and approved where an actual conflict exists.



**We understand** that identifying conflicts of interest can be difficult. When in doubt, reach out to a member of the Legal department or the Ethics & Compliance team.



## Integrity in Action

Examples of potential conflicts that should be avoided or disclosed could include:

- Taking part in hiring or selection decisions involving a family member or friend as an employee, Kaz M-I supplier, or vendor
- Working for, or serving on the board of, an Kaz M-I competitor while also working at Kaz M-I
- Owning or investing in a company that may compete with Kaz M-I, or a vendor that does business (or is going to do business) with Kaz M-I
- Promoting the use of a third party owned by friends or family
- Hiring government officials, customers' employees, or their family members to act as third party representatives for Kaz M-I
- Exploiting opportunities for ourselves, our friends, or our family members that we discover through our work at Kaz M-I or through company property or information.

## Additional Resources

- Policy of the Conflict of Interest



# Avoiding Improper Gifts and Entertainment



When giving gifts or providing entertainment for people outside our company, we always need to think about how others could perceive our actions.



We should never create the appearance of favoritism or a sense of obligation to act in a particular way.



Do not offer any gift or entertainment to any customer or government official, including national oil company (NOC) employees, unless and until you have obtained any approvals required by our Anticorruption Policy and related guidelines. Additionally, always be mindful of our customers' internal policies on gifts and entertainment, which may be more restrictive.



These requirements also apply to donations for corporate social responsibility commitments, dealing with government agencies, working with consultants and agents and sponsoring or paying for travel.

## Integrity in Action

To avoid even the perception of corruption, gifts and entertainment must:

- Be reasonable, infrequent, and not extravagant
- Have a legitimate business purpose
- Not be cash (or cash equivalent)
- Not be in violation of any applicable law, Kaz M-I policy, or customer policy
- Not include adult entertainment or entertainment at prohibited venues



## Additional Resources

- Anticorruption Policy
- Purchasing Policy

# Promoting Fair and Open Competition to Benefit Consumers



We believe that our people, technology, and performance offer clear competitive advantages to our customer base. That's why we want to win work through fair and open competition – never by colluding, conspiring, or cooperating with competitors or customers in a way that would undermine our credibility or their trust in us.



Examples of prohibited conduct include price fixing, bid rigging, market splitting, or unauthorized use of others' confidential information for unfair advantage. This includes using information from a competitor's bid obtained from a client without the competitor's knowledge.



## Integrity in Action

Any business engagements with our competitors must be undertaken with caution to ensure that we avoid even the appearance of anti-competitive conduct.

If unsure, contact the Legal department before sharing or exchanging information with a competitor. Never exchange pricing information or discuss bids.

## Additional Resources

- Policy of business ethics



# Maintaining Accurate Financial Records and Effective Internal Controls

Our performance is what allows us to attract and retain customers, employees, and investors. To effectively manage our business and transparently report on our performance to our shareholders and other stakeholders, we must keep accurate and transparent financial and business information. **We do not tolerate falsification or alteration of any Kaz M-I documents or other business records.**

We maintain a strong system of internal controls. These accounting and auditing processes ensure that we comply with legal, accounting, tax, and other regulatory requirements, and prevent fraud, in every location in which we operate.

## Integrity in Action

Examples of falsification of documents could include:

- Misrepresenting financial results
- Manipulating or changing test results
- Altering or backdating signed contracts, invoices, or other commercial documents
- Forging signatures
- Misrepresenting country of origin on products
- Creating inaccurate or misleading forecasts, expense reports, inventory counts, or customer invoices
- Misrepresenting pricing or charges to customers

## Additional Resources

- Compliance with Anticorruption, Business Ethics, Financial Reporting and Fraud Requirements

We all have a responsibility to:

- Ensure that all company assets are properly secured, disbursed, and accounted for
- Keep our records clear, accurate, and complete
- Not falsify any record or account
- Provide truthful and complete information to anyone responsible for financial reporting, forecasts, or business information
- Cooperate fully with any external or internal audit or investigation
- Accurately reflect all inventory or stock on hand, including any items that may have been disposed of
- Properly document the timing in which work is done, goods and payments are received, and revenue is recognized
- Retain records if asked by the Legal department or the Ethics & Compliance team until you are informed retention is no longer necessary

# Protecting Our Brand



We are proud of our brand as it defines us and embodies who we are, why we exist, and what we do. It inspires confidence in our customers and instills trust within the communities where we work. We must be mindful of what we communicate to ensure it does not reflect negatively on the company's reputation.



To speak with one voice and protect our brand, Kaz M-I has designated certain people to speak on behalf of our company. If you intend to post online or publish your views about topics that impact our business, make sure to clarify that your views are your own and that you are not speaking on behalf of Kaz M-I. In any event, never share confidential or customer information in any public space.

## Integrity in Action

Never speak on behalf of Kaz M-I, including on social media platforms, without prior permission.

Our employees should expect excellence from themselves, their colleagues, and Kaz M-I when it comes to integrity.

We should take pride in working for a company where integrity matters.





# Upholding Integrity, Together



## Leadership

Our industry leadership position has been built on working in harmony with our communities and earning the trust of our stakeholders. As we confront a changing world, we will continue to work together to make responsible decisions and execute on our strategy, driving energy innovation for a balanced planet.



## Foundation

Our Code is both the foundation and the catalyst for our collective commitment to integrity, motivating each of us to embrace our individual role in promoting our values and culture as we focus on what matters most.



## Disciplinary

**Holding Ourselves Accountable** If you have violated our Code, policies, or internal requirements, Kaz M-I may take disciplinary action. Similarly, if you are aware of misconduct, and you don't speak up, or you intentionally provide misleading information, you may also be subject to disciplinary action.



## Code protects

This Code protects us – and the company – from personal, financial, or criminal liability. By reporting a concern, you are living our values, and we will never tolerate any form of retaliation or negative reaction to a concern raised in good faith.





This Code embodies our values, establishes our expectations, and acts as a guide to help you address any challenge you may encounter. Acting in line with our Code builds trust with our customers, community, and stakeholders and honors our shared vision of who we are and how we work.

## Speak Up

- We all feel a sense of ownership at Kaz M-I. If we see something that is not working, we want to fix it. If something can be better, we try to improve it.
- The same applies to integrity. If you see something wrong – something that goes against our values and the principles in this Code – you must speak up.
- Sometimes it isn't easy to figure out the right thing to say or do, but you should still speak up – even if it's just to ask a question. Speaking up is how we drive integrity, together.

## How to Report

You can raise questions or report your concerns in many ways:

- To your manager or to another manager at your location
- To your HR representative
- To a member of the Legal department
- To Ethics Point in SharePoint (online or by phone, anonymously or under your name)
- Through QUEST, by creating a Function-related report
- By submitting a report through kazmi.com (for non-Kaz M-I employees)

Choose the reporting option you are most comfortable with – whichever option you choose, your confidentiality will remain a priority. We only disclose information about your report if necessary to conduct and conclude the investigation.

## What Happens When You Report?

- Sometimes you might feel hesitant to report a concern. But if you don't report it, it cannot be addressed. And in certain cases where you are aware of misconduct, the failure to report may result in disciplinary action. We will always support you to do the right thing – and will not tolerate retaliation against anyone for speaking up in good faith
- Kaz M-I takes all concerns seriously and has established a thorough and independent investigation process. All Kaz M-I employees must cooperate with and provide relevant information when requested. The more detail you provide, the easier it will be to assess the problem, act, and find a solution.