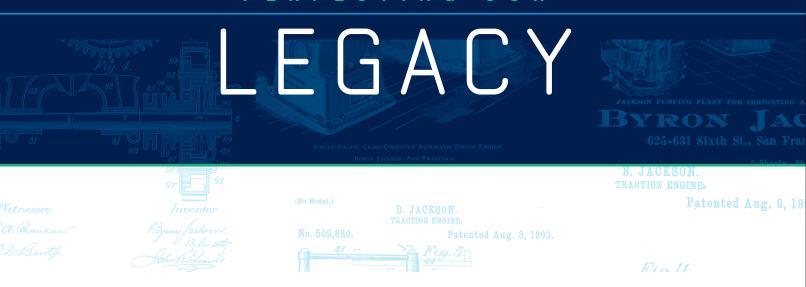


#### PERFECTING OUR



CODE OF CONDUCT | JANUARY 2023 | REVISION 3.0

#### ADDRESSING

BJ Team Members

#### SENDER

Warren Zemlak, CEO

#### DATE

January, 2023

#### SUBJECT

Perfecting Our Legacy

#### AULTAILTIS

Our legacy began over 150 years ago, with a exceptional reputation in the oilfield. Our good name depends upon each and every one of us, committed to our shared values, doing the right thing, every day. Each day our clients and communities put their trust in BJ Energy Solutions to deliver safe solutions that work, to complete projects with the highest standards of safety and to contribute to the well-being of society. We are dedicated to sustaining this trust, recognizing that our reputation depends upon it.

#### TASI

Our legacy demands unyielding commitment to conduct our business responsibly, ethically and legally. We must also exemplify our shared values of Repeatable Operations, Responsible Stewardship, Right Team, and Solutions Focused. In continuing to build our Company on these foundational elements, we will Perfect Operational Execution in the Oilfield.

#### EXECUTION

Our intent is for the BJ Team to act ethically in all we do, and exemplify our shared values of Repeatable Operations, Responsible Stewardship, Right Team, and Solutions Focused.

My plan is for you to study the Code of Business Conduct ("the Code") and for you to speak up whenever you have a question or concern. Whether you are a Team Member or Leader, you have a duty, and a right, to raise concerns. I also pledge that I will live by the Code, and do the right thing in all situations.

#### **ASSISTANCE**

Our Code serves as a resource for all team members, summarizing and clarifying our intent. The Code reflects our continuing and absolute determination to do the right thing. Doing the right thing sounds simple, but we all know that it can often involve serious decision-making and expert navigation of regulations and procedures. Sometimes it demands the courage to ask questions or to speak up. With reliance on the Code and help from our subject matter experts, I know that we can Perfect Operational Execution in the Oilfield.

#### COMMUNICATION

If you are ever unsure about the proper course of action, get guidance from management, human fesources, the legal representative, or the compliance designate.

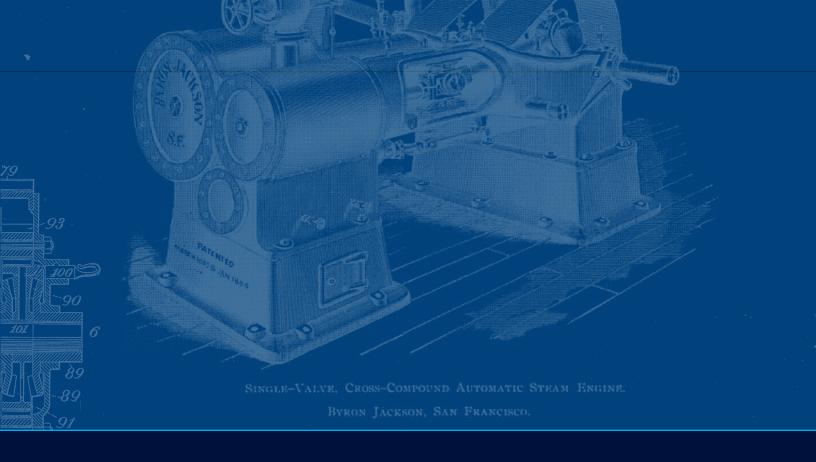
#### SAFETY

Our reputation is built on integrity, but our integrity is based upon the actions of each individual team member. Our legacy depends on each of us doing the right thing, every day. We are counting on you.

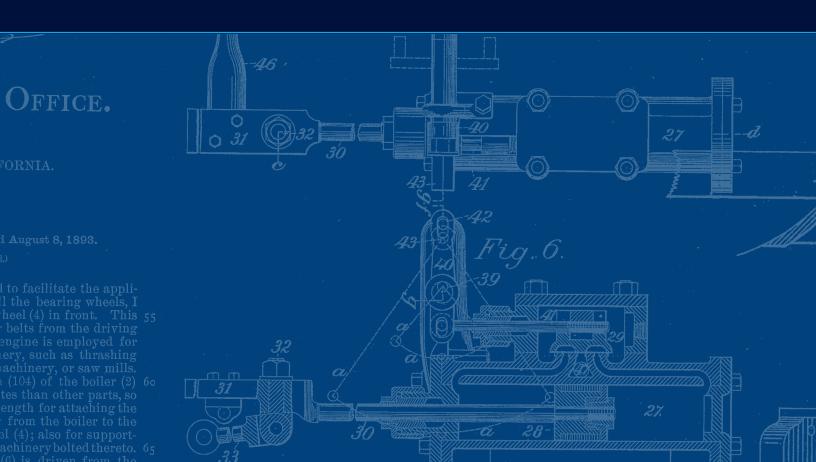
MY INTENT IS FOR THE BJ TEAM
TO ACT ETHICALLY IN ALL WE DO,
AND EXEMPLIFY OUR SHARED
VALUES OF REPEATABLE OPERATIONS,
RESPONSIBLE STEWARDSHIP, RIGHT
TEAM AND SOLUTIONS FOCUSED.

Warren Zemlak
President & CEO





#### O U R I N T E N T

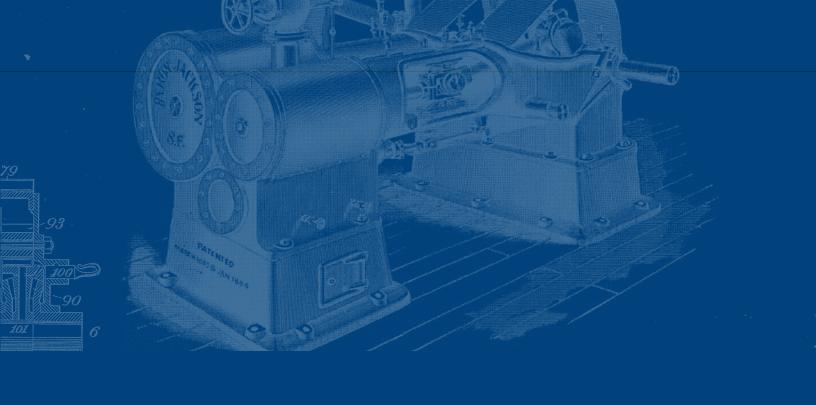


#### PERFECTING

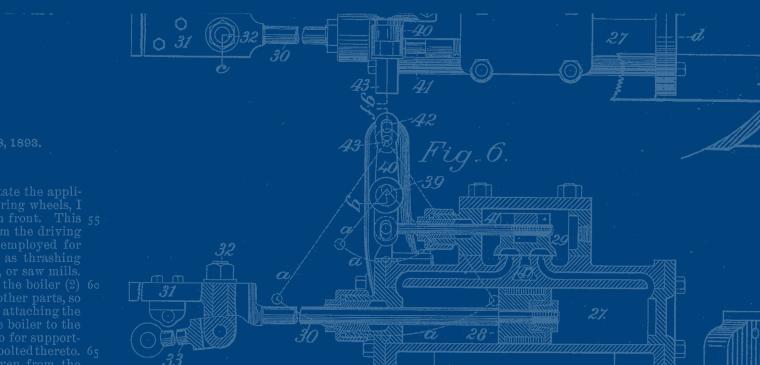
# OPERATIONAL EXECUTION

IN THE OILFIELD

Our shared culture focuses on our core principles. This prepares us to always seek perfection for our clients, by providing Repeatable Operations, Responsible Stewardship, the Right Team and a Solutions Focus. These core principles define how we do our work. We will always seek to ensure that we undertake and execute work that preserves these principles. When we commit to work within our shared culture, we not only achieve our goal of Perfecting Operational Execution in the Oilfield, we achieve a unique leadership position in our industry.



#### O II R I N T F N T



#### REPEATABLE OPERATIONS

Deliver safe, repeatable and reliable operations

#### RESPONSIBLE STEWARDSHIP

Perform work honestly, ethically and with respect for the environment



Build leaders, share knowledge, encourage learning and development opportunities

RIGHT TEAM

Deliver innovative solutions that continuously improve performance and stakeholder returns.

SOLUTIONS FOCUSED



# OUR LEGACY

IS FOUNDED UPON OUR REPUTATION

# Our reputation depends on our ethical business performance.

The Code expresses our standards to help ensure that we conduct business fairly, honestly, ethically and with respect for all of our stakeholders - including fellow employees, clients, suppliers, governments and communities.

#### PERFECTING

# OUR LEGACY

#### **About the Code**

The Code provides the governing principles for how we do business.



Our Code is a resource, but it cannot cover every subject or situation we might face. If you have questions or need additional guidance regarding the code, applicable law or other standards, you can review more detailed policies in our handbooks and on our intranet, or you can consult the compliance designate or another appropriate contact listed in Appendix 1. Our Code does not create any contractual rights.

Laws, regulations, business practices and customs can vary greatly from state to state and country to country. We comply with the law everywhere we do business. If a situation arises where our Code, policies and applicable laws appear to be in conflict, you should contact the compliance designate for guidance before taking action.

Our Code may occasionally be updated or amended to reflect changes in laws and our policies and practices. The most current and authoritative version of our Code is always available on our website, www.bjenergy.com

The Code applies to all directors, officers and employees (collectively "Team Members") of BJ Energy Solutions, and its subsidiaries (The "Company," "BJ Energy Solutions," or BJ)

# OPERATIONAL EXCELLENCE

**Depends on the Ethical Character of All Team Members** 

All Team Members must adhere to our Code at all times in connection with any Company-related matters. You are required to:

#### UNDERSTAND AND

**FOLLOW** the laws and regulations that apply to your job.

### READ, UNDERSTAND

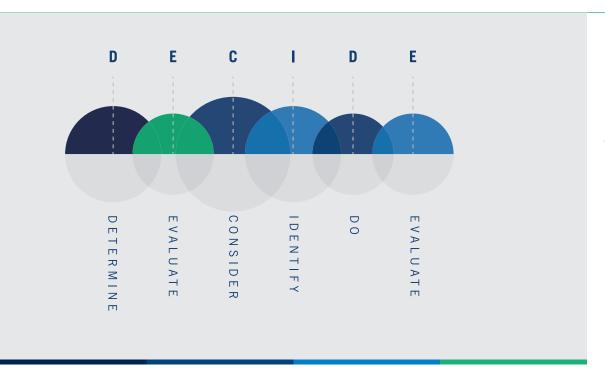
and the underlying policies and practices applicable to you.

# If you are uncertain, SEEK GUIDANCE from your Team Leader or other resources found in Appendix 1.

compliance training; documentation and certifications required by the Company.

# **REPORT** any suspected violations of the Code.

cooperate fully and honestly with any investigations into potential misconduct.



THE DECIDE MODEL

Determine the problem,

Evaluate the scope,

Consider possible

solutions, Identify

the most appropriate

solution, Do the most

appropriate solution and

Evaluate effectiveness.

# DECIDE

#### EVALUATE POTENTIAL ACTIONS

IS THE ACTION LEGAL?	COULD I EXPLAIN IT IN COURT?
HAVE I CONSULTED THE SUBJECT MATTER EXPERTS?	WILL IT APPEAR APPROPRIATE?
DOES IT COMPLY WITH OUR CODE? OUR POLICIES?	COULD IT HARM BJ ENERGY SOLUTIONS' REPUTATION?
WOULD I WANT TO READ ABOUT IT IN THE NEWSPAPER?	IS IT THE RIGHT THING TO DO?

### LEADERS

#### HAVE ADDITIONAL RESPONSIBILITIES

We expect our managers at all levels to be leaders. Team leaders are responsible for promoting a culture of compliance and integrity, including a positive working environment in which people are treated with dignity and respect.



Leader behaviors set the tone.

- Lead by example by living up to the principles of our Code, creating opportunities to discuss the Code, and by reinforcing the importance of ethical conduct.
- Help your team members understand and follow the Code.
- Build other team leaders by supporting our training and certification programs.
- Support those who raise a concern or report
  a suspected problem in good faith, even if
  they go outside of the chain of command.

- Never take or allow a retaliatory action against anyone for reporting concerns in good faith.
- Always stop violations of the Code or the law, follow up when you hear about or suspect potential misconduct, promptly escalate the concern, and never look the other way to ignore misconduct.
- Create an environment where Team
   Members feel comfortable raising concerns
   without fear of retaliation.
- Encourage team members to achieve business results, but never at the expense of ethical conduct or compliance with the Code or the law.

### RAISING CONCERNS

WE ALL HAVE AN OBLIGATION TO UPHOLD THE ETHICAL STANDARDS OF THE COMPANY.

If you observe behavior that you believe represents a violation of our Code, you must raise the issue promptly. Doing so will allow the Company an opportunity to deal with the issue and correct it, ideally before it becomes a violation of law or a risk to health, safety, security or the Company's reputation. Failure to report violations of the Code may result in disciplinary action.

# **Reporting Guide**

You have several options for reporting issues or concerns. One way is by dialing and asking for one of the following:

- COMPLIANCE DESIGNATE
- LEGAL REPRESENTATIVE

You may also call the Ethics line at 844-771-7318 or email at ethics@bjenergy.com to make an anonymous report.

Our compliance designate and legal representatives are available 24 hours a day, seven days a week.

Reports may be made in numerous languages.

BJ investigates all reports of misconduct and is committed to maintaining confidentiality. The Company will disclose the information you provide only on a strict need-to-know basis, or as required by law.

### NO RETALIATION

THE COMPANY VALUES TEAM MEMBERS WHO IDENTIFY POTENTIAL PROBLEMS.

Any retaliation against a team member who raises an issue honestly is a violation of the Code. Raising concern in good faith cannot be the basis for any adverse employment action, including separation, demotion, suspension, loss of benefits, threats, harassment or discrimination.

If you work with someone who has raised a concern, you should treat the information as sensitive and confidential and continue to treat the person with courtesy and respect. If a concern has been raised to you, report that concern to your team leader or the compliance designate.

If you believe someone has retaliated against you, report the matter to the compliance designate.

BJ does not tolerate any form of direct or indirect retaliation that arises from reporting suspected illegal or unethical conduct in good faith or cooperating with an investigation.

# **Answers to Questions**

If you have questions or need additional guidance, you can consult our compliance designate or one of the other resources listed in Appendix 1.



# THE RIGHT TEAM

BJ HAS CAREFULLY CHOSEN ITS TEAM

We are committed to providing a safe, healthy and non-discriminatory work environment for all.





WE AVOID

# DISCRIMINATION AND HARASSMENT

At BJ, we are proud of our Team Members, and committed to a workplace free from discrimination and harassment.

All employment decisions are made without regard to race, color, religion, age, sex, marital status, pregnancy, national origin or ancestry, status as a covered veteran, status as a qualified individual with a disability, genetic information, sexual orientation, or any other legally protected status in accordance with applicable laws.

This includes providing reasonable accommodation for employees' disabilities or religious beliefs and practices.

# We expect our team members to treat each other with dignity and respect

Never harass one another based on race, color, religion, age, sex or other protected characteristics.

Team Members can help by speaking up to let co-workers know if they feel offended by remarks or behavior, in order to set clear expectations and boundaries.



WE DO NOT TOLERATE

# WORKPLACE VIOLENCE

WE FOSTER A SAFE AND SECURE WORK ENVIRONMENT, FREE FROM VIOLENCE.

A safe and secure work environment means a workplace free from violence.

# BJ will not tolerate any of the following:

- Threatening or intimidating behavior
- Brandishing or implying threats with firearms,
   ammunition, explosives or weapons of any kind.
- Assaults or violence of any kind
- Implied threats of violence or intimidation



IMPROPER, UNSAFE OR ILLEGAL USE OF

# DRUGS AND ALCOHOL ARE NOT TOLERATED

#### BJ IS A DRUG-FREE WORK ENVIRONMENT

You may not be under the influence of alcohol or illegal drugs on BJ property, at a work site or while in care and control of any Company vehicles. This includes reporting to work while still under the influence of alcohol or illegal drugs. The use or possession of illegal drugs on BJ property, at a work site or while in care or custody of Company vehicles is prohibited. In addition, the use or abuse of any substance (even if prescribed by a doctor) in a manner that impacts your ability to perform your job safely and effectively is prohibited. Please refer to the Company's Drug and Alcohol Standard for additional information.

Working Under the Influence Puts Our Entire Team at Risk.

Any suspected violations of our alcohol or drug policies should be immediately reported to HR or EHS & Reliability.

#### **WE CARE ABOUT**

### **HEALTH AND SAFETY**

BJ WILL NOT COMPROMISE HEALTH OR SAFETY IN THE WORKPLACE.

It is your responsibility to understand the health and safety issues that impact your job and perform your responsibilities consistent with BJ Energy Solutions' health and safety requirements.

You also have the responsibility to know and follow the EHS & Reliability regulations, policies, standards and practices that apply to your work and to help make the workplace safe for everyone. Failing to properly report violations or asking another employee not to report one is a violation of our Code and may result in disciplinary action, up to and including termination. Stop work immediately if you see an unsafe working condition and report the condition to your team leader.

It is everyone's responsibility to take necessary precautions to prevent incidents and injuries, as well as to report any unsafe practices or conditions.

If you become aware of any threat to the safety of a co-worker, a worksite, or a community near our operations, report it immediately.

"Our work is important but never so urgent that we cannot take time to do it safely."

Warren Zemlak
President & CEO



#### WE AVOID

### CONFLICTS OF INTEREST

#### Relationships with Outside Companies

A conflict of interest arises when your personal activities, financial interest, and relationships interfere or appear to interfere, with your ability to act in the best interest of the Company. Your personal interests and relationships must not interfere, or appear to interfere, with your ability to make decisions in the best interests of the Company. The Company will terminate relationships – employees, representatives, contractors or other business relationships if those relationships present irreconcilable conflict with the principles of our Code.

#### **Suppliers**

Any situation that involves or may reasonably be expected to involve a conflict of interest must be promptly disclosed to your team leader and the compliance designate.

The written permission of your department manager or the compliance designate, and any conditions, is required to proceed, and must be renewed annually. Take particular care if you are responsible for selecting or dealing with a supplier on behalf of the Company. When selecting suppliers, always follow applicable Company procurement guidelines.

#### **DETERMINING**

### **Conflicts of Interest**

In any potential conflict of interest situation, ask yourself:

Could my personal interests interfere with those of the Company?

Might it appear that way to others, either inside or outside of the Company?

WHEN UNSURE, SEEK GUIDANCE.

#### **Outside Investments**

Avoid investments that could affect, or appear to affect, your decision making on behalf of the Company. Specific guidelines apply to ownership - even just as an investment - of a client, supplier or competitor of the Company.

You may not own directly or indirectly more than 2% of the stock of any client, supplier or competitor unless that ownership is disclosed to, and approved by, the compliance designate in writing. In making a decision concerning such ownership, the compliance designate will consider any discretionary authority you may have with respect to that company.

#### **Mutual Funds**

These restrictions on outside investments do not apply to publicly available mutual funds or similar investments in which the employee does not have control over the selection or weighting of the equities in the fund.

#### **Outside Employment and Directorships**

In general, you may be employed outside of the Company, as long as your outside employment does not interfere with your ability to do your job with the Company. You may not be employed by, or otherwise provide services for or receive payment from, any client, supplier or competitor of the Company, without the written approval of the compliance designate.

You may serve as a member of the board of directors of another business or a non-profit; however, if the business is a client or supplier, you may only serve with prior written approval of the compliance designate. You must renew this approval annually. You may not serve on any competitor's board of directors.

#### Contracting with Relatives

Many team members have relatives who are employed by, or invest in, clients or suppliers of BJ. These financial interests do not create a conflict under the Code unless:

- If all other requirements under the code are met, you have discretionary authority in dealing with the Company as part of your job with BJ Energy Solutions, and your relative's investment, whether direct or indirect, exceeds 2% of the invested capital of the company in question.
- Your relative deals with BJ Energy
   Solutions on behalf of the other company.

#### **Employment of Relatives**

We think of our team members as family. We do not discourage employing persons closely related to other Company employees; however, such employment must avoid any perception of favoritism or impropriety. Family members should not supervise one another, and the team leaders of both employees must be notified of the relationship. Human Resources can provide further information, and may require controls and procedures to be adopted to avoid any perceived conflicts.

In either of these situations, you must inform the compliance designate in writing, comply with any procedures or controls required and renew this approval annually.

# Who Is My "Relative" Under the Code?

- A spouse or domestic partner
- A grandparent or grandchild
- Any family member who lives with you or is financially dependent on you
- A parent, sibling, child or step-child
- A mother- or father-in-law
- Any person that you feel would impact your ability to remain impartial and to seek the best interest of the Company

#### Other Personal Relationships

You may have friends who are employed by, or have ownership interests in clients or suppliers of BJ. If you deal with such a client or supplier, take care to ensure that your friendship does not affect, or appear to affect, your ability to act in the best interest of the Company. If you are uncertain whether your friendship may create an issue, consult your team leader, human resources or the compliance designate.

Conflicts of interest may also arise when a team member or a member of his or her family receives improper personal benefits as a result of his or her position in the Company, whether received from the Company or a third party. Loans to or guarantees of obligations of team members and their respective family members may also create impermissible conflicts of interest. Federal law prohibits loans by the Company to executive officers and directors of the Company.



Personal relationships at work must not influence your ability to act in the best interest of the Company and must not affect any employment relationship in a manner that is contrary to the Company's best interests.

Employment-related decisions should be based on qualifications, performance, skills and experience.

# GIFTS, MEALS AND ENTERTAINMENT

Acceptance of gifts, meals or entertainment from persons or organizations doing or seeking to do business with BJ Energy Solutions that do not meet the following limitations must be approved in writing by the compliance designate. Any uncertainties should be discussed with your team leader or the compliance designate.

#### ACCEPTABLE

Gifts of symbolic value, such as trophies and statues that are inscribed in recognition of a business relationship.

Gifts or discounts offered to a large group of employees as part of an agreement between the Company and a client or supplier may be accepted and used as intended by the client or supplier.

Occasional meals and entertainment from clients and suppliers if the event is attended by the client or supplier, and the costs involved are in line with local custom for business-related meals and entertainment. For example, ordinary business meals and attendance at local sporting events generally are acceptable.

#### **NOT ACCEPTABLE**

Gifts, meals or entertainment in exchange for doing, or promising to do, anything for a client or supplier.

Requesting gifts, meals or entertainment from a client or supplier.

Gifts, meals or entertainment that create an appearance of improper influence or appear excessive under the circumstances.

Personal discounts or gifts of goods and services provided that could be used by the Company, such as a free room at a hotel by the hotel contractor, or a free chair for your home by the furniture sales company.

Gifts, meals or entertainment given with unusual frequency or repetition.

Receiving gifts valued at or over \$200 without proper approval.

# Gifts, Meals and Entertainment

To build goodwill with potential and existing clients and other business partners, exchanging gifts and entertainment as business courtesies is accepted business practice.

The Company requires the use of good judgment and moderation when giving or accepting gifts or hospitality in business settings.

If others believe that a business decision was made because of a gift or business courtesy and not purely on the basis of merit and sound business judgment, our reputation will be harmed.

#### Travel and Premium Events

If you are invited by a client or supplier to an event involving out-of-town travel or overnight stay, or to a premium event such as the Olympics, World Cup, Super Bowl or similar event, consult the Compliance Designate to determine if there is adequate business rationale for your attendance and whether the Company should pay for your travel to attend the event.

#### Refusing Gifts, Meals and Entertainment

If you are offered a gift, meal or entertainment that exceeds the limits noted, politely decline and explain the Company's rules. If returning a gift would offend the giver, or the circumstances under which it was given preclude its return, you may accept the gift on behalf of the Company, not for personal use. You must immediately notify the Compliance Designate, who will work with you either to donate the item to charity, or otherwise provide for a lawful use or distribution of the item.

# Providing Gifts, Meals and Entertainment to Clients and Suppliers

Gifts, meals and entertainment for clients and suppliers must support the legitimate business interests of the Company and should be reasonable and appropriate under the circumstances. Always be sensitive to and comply with our clients' and suppliers' rules on receiving gifts, meals and entertainment.

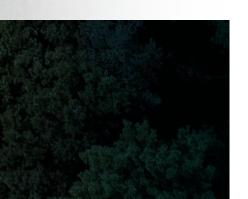


# OUR LEGACY

DEPENDS UPON RESPONSIBLE STEWARDSHIP

# Protect the Company assets, and use those assets properly and efficiently.

Do not use your position or Company assets for your personal benefit or the benefit of anyone other than the Company, unless otherwise permitted by Company policy. Theft, carelessness and waste have a negative impact on our profitability.



#### **WE PROTECT**

### COMPANY ASSETS

Use common sense in protecting Company assets. For example, within reason, personal phone calls or e-mails from your workplace are acceptable. Excessive personal calls or excessive use of e-mail for personal matters is a misuse of assets. Company policy may allow additional personal use of certain Company – owned assets, such as a wireless communication device or laptop. Always check relevant policies to ensure that you are using Company assets in the Company's interest as intended.

Do not engage in personal activities during work hours that interfere with or prevent you from fulfilling your job responsibilities. Do not use Company computers and equipment for outside businesses, or for illegal, unethical or offensive activities.

#### Theft or Misuse of Company Assets, Time or Information

Whether physical theft such as unauthorized removal of Company product, equipment or information, or theft through embezzlement or intentional misreporting of time or expenses, theft of our Company's assets could lead to termination or other disciplinary action. The Company treats workplace theft of assets belonging to other employees the same way it treats theft of Company assets.

#### **EXAMPLES OF**

# **Company Assets**

- Company money
- Company equipment or tools
- Your time at work
- The result of your work
- Computer systems and software
- Telephones

- Photocopiers
- Company tickets to concerts or sporting events
- Company vehicles
- Proprietary information

Your time at work and the product of your work are Company assets that should be used in the best interest of the Company.

New inventions should be properly disclosed to the Company to allow for proper protection and documentation.

#### WE REQUIRE

# FINANCIAL INTEGRITY

#### & INTERNAL CONTROLS

Maintain the accuracy of the Company business and financial records that you manage. Ensuring accurate and complete business and financial records is everyone's ethical responsibility, not just a role for accounting personnel. Accurate records reflect on the Company's reputation and credibility, and ensure they help the Company to meet its legal and regulatory obligations. We design our financial and accounting standards to deter wrongdoing and promote honest and ethical conduct.

#### FINANCIAL INTEGRITY MEANS THAT WE WILL PROMOTE THE FOLLOWING OBJECTIVES:

- 1. Always record and classify transactions accurately, in the proper accounting period and in the appropriate account.
- 2. Support estimates and accruals by appropriate documentation, in accord with proper accounting standards, based on best judgment.
- 3. Provide full, fair, accurate, timely and understandable disclosures in reports and documents submitted to regulatory authorities or in other public communication.

- **4.** Never falsify any document.
- **5.** Never distort the true nature of any transaction.
- 6. Never assist in another person's efforts to evade taxes or subvert applicable law or our policies.

#### **Expenses and Other Claim Forms**

The need for accurate reporting extends to expense reports and the use of corporate credit cards. Exercise good judgment and discretion when incurring expenses that will be reimbursed by the Company and adhere to the Company's expense reimbursement policies, including full and timely payment of outstanding balances on corporate credit cards. If you are responsible for approving expense reports, be mindful of transactions that seem out of line with policy. Poor documentation or incomplete reports may be an indication of fraud that should be reported immediately. If you have questions about expense reimbursement, seek guidance from your team leader, or the compliance designate.

#### **Accounting Controls**

We maintain a system of Internal Accounting Controls sufficient to provide reasonable assurance that:

- (1) transactions are authorized by management, (2) transactions are properly executed and recorded, and (3) assets are properly accounted.

#### **WE PROTECT**

# CONFIDENTIAL AND PROPRIETARY INFORMATION

Safeguard the Company's nonpublic confidential information, which includes everything from contracts and pricing information to marketing plans, technical specifications and employee information. It also includes the non-public information of our clients and other companies whose information we have agreed to keep confidential.

Everyone at BJ is obligated to protect confidential information, whether ours or someone else's, at all times, including outside of the workplace and working hours, and even after employment ends. This means exercising caution when discussing confidential and proprietary information in public places where you can be overheard, such as elevators, restaurants or hotel lobbies.

Do not disclose confidential and proprietary information on the Internet (i.e., message boards, websites, social networking sites, blogs, etc.) or to BJ employees who do not have a legitimate business reason to know the information.

#### WHAT IS CONFIDENTIAL INFORMATION?

It is any information that the Company has not disclosed or made generally available to the public. Examples include information related to:

- 1. Team members
- 2. Clients
- 3. Strategic and business plans
- 4. Contracts
- 5. Major management changes
- 6. Mergers and acquisitions
- 7. Technical specifications
- 8. Pricing

WE PROTECT

# COMPUTER AND DATA SECURITY

BJ owns or is licensed to use the technology used in our business — including hardware, software and computer systems. This technology and the information stored on our computer systems are critical to our success.

Everyone who has access to BJ Energy Solutions information and technology is responsible for protecting these valuable resources. If you believe that anyone is placing the performance and/or security of Company, or third-party, information or systems at risk, you should immediately advise your team leader or the IT Subject Matter expert. See Appendix 1.



The Company has entrusted you with its technologies so that you may conduct Company business. None of these resources may be used to conduct illegal activities or to communicate discriminatory, harassing or threatening messages. Using Company technology to download or transmit obscene or sexually explicit material is not permitted. Keep in mind when using the Company-issued technology assets, such as computers and telephones, you should have no expectation of personal privacy.

To the fullest extent permitted by applicable law, BJ reserves all rights to monitor and review any messages and information sent or received using Company resources. Please see the Company's Information Security Standard for more information.

#### **WE MANAGE**

### OUR RECORDS LAWFULLY

Protecting and maintaining the records necessary for financial and operational needs, as well as complying with applicable legal and regulatory requirements, is everyone's obligation.

Records can exist in both physical and electronic form and include documents, files, emails, graphs, databases, maps, charts, memos, pictures, videos, audio recordings, voice mails, etc., as well as data on mobile devices (for example, cell phones, flash drives, etc.).

Good business practices require that we retain certain records consistent with our Records Retention Standard. If you are notified that documents in your possession may be relevant to litigation, an investigation or an audit or you receive a "legal hold" notice, you are required to maintain such records and follow the instructions set forth in the notice. Never delete or destroy records that are subject to (or that you know are likely to be the subject of) a government or internal investigation, subpoena or lawsuit.

When litigation or a government investigation is ongoing, relevant records may not be destroyed until the Legal Department or the compliance designate has advised that the matter has been concluded. Destruction of records to prevent their disclosure may be unlawful and could lead to criminal prosecution.



You should consult the compliance designate if you have any questions regarding BJ Energy's Records Retention Standard, especially if litigation or a government investigation is pending or is anticipated. Do not attempt to improperly influence any auditor, regulator or investigator reviewing Company records nor encourage anyone else to do so.

You should notify the Legal Department if you are approached by a government official, investigator or regulator regarding the Company. You should not provide any Company records to any external requester without prior written approval from our Legal Department.

Each employee is
responsible for
managing the records
under his or her control,
including making sure that
records are maintained
in a manner consistent
with BJ Energy's Records
Retention Standard.

#### WE DO NOT MISUSE

### SOCIAL MEDIA

Most of us have access to the Internet on our work computers. Only the Marketing Department may publish social media communications on behalf of the Company.

You must be careful to protect the Company's reputation and business information by not posting any comments or documents on any social media sites such as photo and video sharing sites, blogs, wikis or other bookmarking sites — negative or positive — that are confidential or could be attributed to our Company.









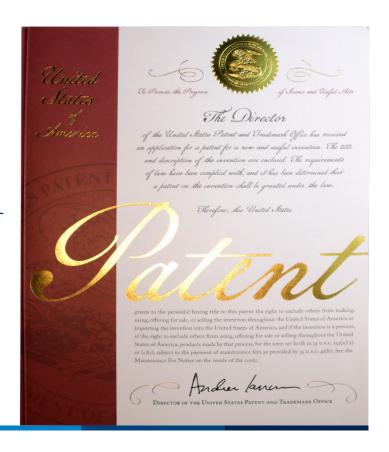
#### Any use of social media should:

- Not violate the law (for example, libel, defamation, harassment or copyright laws) or Company policies (for example, policies regarding disclosure of confidential or proprietary information or speaking on behalf of BJ)
- Not denigrate or insult BJ team members, clients, or business partners
- Never infringe upon the intellectual property rights of BJ or its business partners or clients, including logos, trademarks, photos or videos
- If speaking about your professional life, clearly state that these are your personal views and not necessarily the views of the Company

OUR INTELLECTUAL PROPERTY

# DISTINGUISHES US FROM OUR COMPETITORS

Patents, trade secrets, copyrights and trademark ("Intellectual Property") are legal terms to describe an invention, know-how, product, idea, written work or name that is owned by an individual or company, where use of these by others is prohibited without express permission.



BJ Energy Solutions' Team Members may develop ideas, processes and technology on BJ Energy Solutions behalf or in the scope of their work for the Company, or they may find ways to improve or further develop the Company's technology and Intellectual Property. These developments or improvements belong to the Company, or in some cases its clients or business partners, and not to employees.

As part of your employment with BJ, you agree to execute an assignment of the rights to Intellectual Property that you develop or other documents reasonably requested by the Company.

#### Intellectual Property

Team Members may have personal or pre-existing Intellectual Property created outside of their BJ employment. However, no such outside or pre-existing Intellectual Property may be brought into BJ, disclosed to BJ team members or clients, or incorporated into BJ work products, without prior written approval of the compliance designate or his or her designee.

You should not copy or forward articles, data, photographs, videos, or use software without obtaining the required authorization from the author or owner, or confirming in advance with our Legal Department that such action is permissible.

Employees who take such actions with their outside or pre-existing Intellectual Property without prior written approval are deemed to have granted a perpetual, royalty-free license to BJ and its clients in that Intellectual Property.



WE PROTECT

## THE PRIVACY OF DATA

We are committed to respecting and protecting the privacy of all individuals, including team members, business contacts, job applicants and website users consistent with applicable legal requirements in every location where we operate.

Each team member is prohibited from accessing, without prior authorization, any system or database containing an individual's personal data. Only people with a "need to know" because of their job may access or share personal data in compliance with applicable law. Personal data must be collected, stored, used, disclosed, transferred and disposed of in accordance with our policies and applicable law.



# OUR COMMUNITIES

ARE WHERE OUR LEGACY IS ROOTED



We intend to be good citizens of the communities in which we live and work.

BJ IS COMMITTED TO

## ENVIRONMENTAL EXCELLENCE

We are committed to managing and operating our assets in a manner that protects and conserves the environment.

We operate in a manner that is consistent with all environmental laws and regulations. All team members must understand the potential environmental issues that impact their job.

If you see a problem, report it immediately.

Please consult our EHS & Reliability policies or your EHS & Reliability representative for more information.

#### WE RESPECT TEAM MEMBERS

### POLITICAL ACTIVITY

BJ Energy Solutions respects personal participation in the political process in a manner consistent with all relevant laws and Company guidelines.

There are stringent legal restrictions prohibiting the Company from contributing to elected officials, members of their staff and political parties. For this reason, you may not give or offer Company funds or other Company assets (directly or indirectly) as any form of political contribution. An improper political contribution can cause problems for the candidate and harm BJ Energy Solutions' reputation.

"Political contributions" are defined broadly and can even include buying tickets for, or loaning corporate resources to, a political fundraising event.

### **Personal Political Activity Limitations**

- Do not use the Company's reputation or assets, including your time at work,
   to further personal political activities or interests.
- The Company will not reimburse employees for personal political activity.
- Your job will not be affected by your personal political views or your choice in political contributions.



WE HONOR

## LOCAL AND NATIONAL CHARITIES

We strive to be good citizens of the communities where we operate.

Our intent is to encourage volunteerism and contributions to charitable causes wherever we live and work. We want to be good citizens, not just with our commitment to the environment, but also with regard to our neighbors, nearby businesses and schools, and our communities. We encourage personal donations to local charitable causes and fundraising activities.

Occasionally, it is appropriate to use Company funds for charitable causes or events. All charitable expenditures for any entertainment, travel, gifts, donations or favors must be properly authorized, charitable and accurately and promptly recorded in our books and records. Before we can provide financial support, we must obtain proper approval through our senior management.

#### WE CAREFULLY

## COMMUNICATE

External communications are communications made by BJ Energy Solutions' team members, to persons or entities outside of BJ Energy Solutions.

Other than executive officers, no employee of the Company is authorized to engage in any form of public media communication that gives any information related to BJ Energy Solutions or its clients, or makes statements on behalf of, or that could be understood to be on behalf of BJ Energy Solutions. All inquiries from any representative of the news media must, under all circumstances, be referred immediately to the legal representative or executive officers. See Appendix 1 for contact information.



#### OUR LEGACY IS DEFINED BY

# OUR ACTIONS

Our intent is always to comply with the law and regulations or requirements that affect the Company.

When acting on behalf of the Company, in connection with Company business, each team member must use his or her best efforts to comply with all applicable laws and regulations.





## INSIDER TRADING

Trading in stocks or securities based on material non-public information, or providing material non-public information to others so that they may trade, is illegal and may result in criminal prosecution against the individual as well as the Company.

BJ Energy Solutions information about potential commercial contracts, financial information, operations or other proprietary matters or sensitive "market moving" information must be carefully guarded, and only revealed internally or to our consultants or others who have a need to know and have agreed not to disclose the information or act improperly on it. Any material non-public information gained about BJ Energy Solutions, or our clients or business partners cannot be used to make any stock market trading decisions. If you have any questions about whether you are permitted to act on any particular information or "stock tip," you should contact the compliance designate.

#### INTERNATIONAL

## TRADE RESTRICTIONS AND BOYCOTTS

#### Trade Compliance is not Optional

Employees should contact the compliance designate, the Trade and compliance Subject Matter Expert or the Ethics line for guidance before engaging in any conduct when they are unsure if the conduct is legal or permissible.

The Company must comply with all applicable trade restrictions and boycotts imposed by the U.S. and Canadian governments and any other governmental authority with jurisdiction over our operation in that county. Sanctions for non-compliance can be severe, including fines and imprisonment for responsible individuals, and the Company may be prohibited from further participation in certain trade.

All team members, when acting in the scope of their employment, are required to comply with U.S. and Canadian regulations governing the export and re-export of controlled items and goods, software and technology, as well as with regulations governing imports into the United States and Canada. In addition, Team Members are prohibited from investing or transacting business with designated countries and entities that have been sanctioned by the U.S. or Canadian governments, as applicable.

#### Information or

#### TRADE RESTRICTIONS AND BOYCOTTS

Detailed information on trade restrictions that may be in effect at any given time may be requested by contacting the Trade Compliance Subject Matter expert or the compliance designate.

The Company also must abide by anti-boycott laws that prohibit companies from participating in any international boycott not sanctioned by the applicable government. Before shipping any product in or out of the country, please ensure that you have all of the required information and have reviewed the relevant Company policies. Contact the Trade compliance subject matter expert with any questions or concerns.

See Appendix 1 for contact information.

#### WE COMPLY WITH

## ANTI-CORRUPTION LAWS

The Company complies with various anti-corruption laws including the U.S. Foreign Corrupt Practices Act ("FCPA"), Canada's Corruption of Foreign Public Officials Act and similar laws in other countries when applicable.

Team members are expected to conduct business in accordance with these laws. Generally, these laws prohibit the Company, its employees and anyone else acting on its behalf from giving or offering anything of value to corruptly obtain or retain business or secure an improper business advantage. "Anything of value" includes not only cash, but also gifts, travel, meals, entertainment and other items. Special care must be used when dealing with government officials, because applicable anti-corruption laws define that term broadly to include political candidates and their parties, the lowest level of government functionaries, and even employees of government-owned or controlled companies. BJ Energy Solutions prohibits bribery in all forms. No team member may enter into any transaction on behalf of the Company that he or she knows, or has reason to believe, would violate such laws.

Under such laws, BJ can be held responsible for the actions of its foreign agents and intermediaries. In some cases, this can happen even when we are not aware of the agents' or intermediaries' actions. Some examples of agents and intermediaries are sales agents (and in some cases distributors or resellers), business partners, joint venture partners, freight forwarders, customs agents, tax advisors, lawyers and anyone else who interfaces with third parties on behalf of BJ Energy Solutions.

Because anti-corruption laws are complex, prohibit a broad range of conduct and carry severe penalties for both companies and individuals, it is critical that our team members perform all business activities in accordance with the requirements identified in applicable Company standards, practices and procedures. In addition, contact the compliance designate for guidance before engaging in any conduct when unsure if the conduct is legal or permissible.

#### BE ON THE LOOKOUT FOR POSSIBLE

## MONEY LAUNDERING SCHEMES

It is BJ Energy Solutions' policy – and the responsibility of each Team Member - to comply with all anti-money laundering laws applicable to the Company and its subsidiaries.

"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 illegally obtained funds look legitimate.

To detect and combat money laundering, Team Members should be on the lookout for incomplete documentation and irregularities in the way payments are made. If an employee sees any of the following, he or she should seek advice from a subject matter expert and/or report the matter through one of the channels provided in this Code:

- Payments made in currencies other than those specified on the invoice.
- Payments made to or received from countries unrelated to the transaction
- Attempts to make payments in cash or cash equivalents.
- Requests to make an overpayment.
- Payments made by 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 or to multiple accounts.

#### WE COMPETE FAIRLY AND COMPLY WITH

### ANTITRUST LAWS

We comply with various competition laws, also known as antitrust laws, in the countries where we do business. These laws are designed to uphold the free market system and ensure that businesses compete to provide quality services at fair prices.

Competition laws generally prohibit price fixing, dividing territories and other similar collaboration with competitors that are designed to reduce competition. They also prohibit certain agreements or understandings with our clients, suppliers or other business partners that could unlawfully restrict competition. No team member may engage in any activity that is contrary to these laws. If you are uncertain whether a proposed activity is permitted, please consult the Legal Department or the compliance designate.

#### **RELATIONS WITH**

## **Clients, Suppliers and Consumers**

We do not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing or practice.

- Always deal fairly with clients and suppliers, treating them honestly and with respect:
- Do not engage in unfair, deceptive or misleading practices
- Always present Company products in an honest and forthright manner
- Do not offer, promise or provide anything to a client or supplier in exchange for an inappropriate advantage to the Company

We expect that our suppliers will take no action contrary to the principles of our Code. Accordingly, the owner of each supplier relationship should ensure that adherence to these or substantially similar principles is a condition to an ongoing relationship.

## RELATIONS WITH COMPETITORS

Take care in dealing with competitors and gathering information about competitors. Various laws govern these sensitive relationships.

Employees may collect, share and use information about our competitors, but only in a legal and ethical manner. Just as the Company values and protects its own non-public information, we respect the non-public information of other companies.

#### Avoid Direct Discussions with Competitors Regarding Competitive Business Matters.

If you attend trade association or industry conferences, exercise caution and do not discuss anti-competitive topics with a competitor, such as pricing information. If a competitor attempts to bring up a prohibited topic, you should stop the conversation immediately and decisively. Call the Compliance Designate immediately for advice. Also, be aware that BJ may enter into joint ventures or projects with companies with which we otherwise compete. You must be careful not to use or discuss any pricing, cost or strategic information given or received outside of that particular joint venture or project. Such discussions could be deemed to be, or could lead to, anti-competitive practices.

#### Acceptable Intelligence Gathering

It is acceptable to collect competitive intelligence through publicly available information or ethical inquiries. For example, you may gather and use information from sources such as:

PUBLICLY AVAILABLE FILINGS WITH GOVERNMENT AGENCIES  COMPANY EXECUTIVES  ANNUAL REPORTS  NEWS AND TRADE JOURNAL ARTICLES AND PUBLICATIONS		
ANNUAL REPORTS NEWS AND TRADE JOURNAL	PUBLICLY AVAILABLE FILINGS	PUBLIC SPEECHES OF
	WITH GOVERNMENT AGENCIES	COMPANY EXECUTIVES
ARTICLES AND PUBLICATIONS	ANNUAL REPORTS	NEWS AND TRADE JOURNAL
		ARTICLES AND PUBLICATIONS

You may ask third parties about our competitors, or accept competitive intelligence offered by a third party, as long as there is no reason to believe that the third party is under a legal obligation not to reveal such information.

#### **Prohibited Activities**

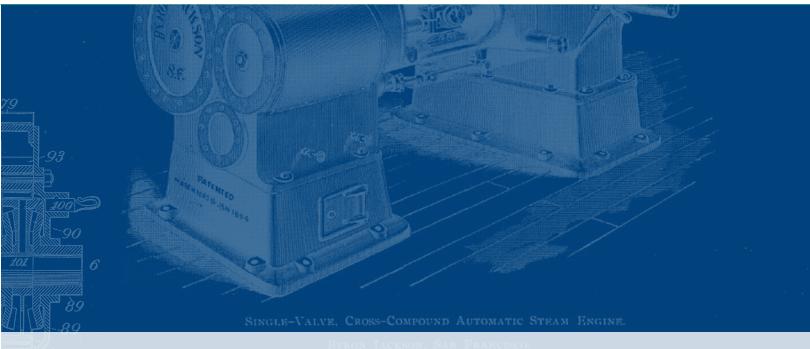
The following basic restrictions apply to our ability to gather competitive intelligence:

- Do not engage in any illegal or illicit activity to obtain competitive information. This could include
  theft, trespassing, eavesdropping, wiretapping, computer hacking, invasion of privacy, bribery,
  misrepresentation or searching through trash.
- Do not accept, disclose or use competitive information that you know or have reason to believe
  was disclosed to you in breach of a confidentiality agreement between a third-party and one of
  our competitors.

#### Corporate Opportunities

You owe a duty to the Company to advance the legitimate interests of the Company when the opportunity to do so arises. You are prohibited from directly or indirectly:

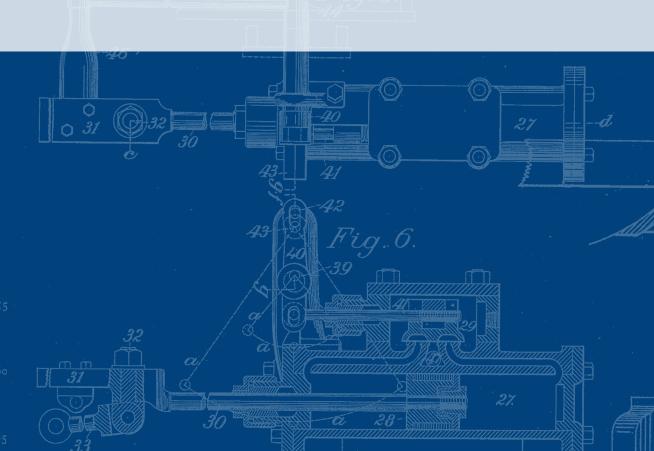
- Taking personally for yourself opportunities that are discovered through the use of Company property, information or positions;
- Using Company property, information or positions for personal gain; and
- Competing with the Company for business opportunities.



ADMINISTRATION OF

## THE CODE

I the bearing wheels, I heel (4) in front. This 55 belts from the driving engine is employed for ery, such as thrashing



## This Code Applies

#### TO DIRECTORS, OFFICERS AND EMPLOYEES OF BJ.

Before any officer, director or employee, or any family member of an officer, director or employee engages in any activity that would otherwise be prohibited by the Code, he or she must obtain a written waiver through the compliance designate from the disinterested members of the Board. A waiver applicable to an officer or director must be disclosed to the Company's Shareholders, along with the reasons for granting the waiver.

#### Responsibility

The responsibility for administering the Code rests with the compliance designate (or his or her designee), with oversight by the Chief Executive Officer and the Board of Directors. Senior leaders of the Company representing corporate functions as well as operations are required to support the Code and the Chief compliance designate as needed.

#### **Decisions**

The compliance designate, or Chair of the Board's Audit Committee (in some cases), may issue recommendations about Code violations and the Company may take disciplinary measures based on the recommendations and in compliance with the Company's policies. Depending upon the seriousness of the breach of the Code, the Company will take all necessary measures to correct the issue and ensure accountability for adherence to the Code.

#### **Investigation of Potential Code Violations**

The Company takes all reports of potential Code violations seriously and is committed to confidentiality and an investigation of all allegations. The Company's compliance designate may conduct or manage Code investigations. Employees who are being investigated for a potential Code violation will have an opportunity to be heard prior to any final determination.

#### Signature and Acknowledgment

All employees must acknowledge that they have read the Code of Business Conduct and agree to abide by its provisions. All employees will be required to make similar acknowledgments on a periodic basis. Failure to read the Code or sign the acknowledgment form does not excuse an employee from compliance with the Code.

#### **Contact Information**

See Appendix 1 for contact information for compliance designate and all subject matter experts.

## APPENDIX 1

## CONTACT INFORMATION FOR THE COMPLIANCE DESIGNATE AND SUBJECT MATTER EXPERTS

#### Compliance

2001 Timberloch Place, Suite 350 The Woodlands, Texas 77380 ethics@bjenergy.com

SUBJECT MATTER EXPERT	TELEPHONE	EMAIL
External Communications	(346) 867 8910	media@bjenergy.com
Finance	(346) 867 8906	finance@bjenergy.com
Human Resources	(346) 867 8901	hr@bjenergy.com
Information Technology	(346) 867 8900	support@bjenergy.zendesk.com
Legal Department	(346) 867 8900	legal@bjenergy.com
Trade Compliance	(346) 867 8897	supplychain@bjenergy.com

## APPENDIX 2

#### Annual Acknowledgment and Certification

My signature below certifies that:

- I have read the most recent version of the BJ Energy Solutions' Code of Business Conduct,
   I understand that it represents Company policy and I agree to comply with it.
- I have sought and received clarification regarding any portion of this Code of Business
   Conduct that is unclear to me.
- I agree to promptly report to one of the Company's specified reporting channels all violations of applicable law or this Code of Business Conduct of which I come aware.

DATE SIGNED

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