



# The Time is NOW for Integrity and Ethics

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Code of Business Conduct  
and Ethical Standards

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## A Message from Our CEO and Our General Counsel

Dear Colleagues,

DNOW is made up of exceptional employees around the world who deliver unparalleled customer service. Because of our employees, DNOW has a reputation for meeting our customers' expectations, delivering on our commitments, leading our industry, and being on the cutting edge of innovation. But none of our success, both now and in the future, would be possible without our continuing and unrelenting focus on integrity and ethics. There is no opportunity or business success that is worth sacrificing DNOW's reputation for integrity and ethical conduct – that is at the core of who we are and how we do business.

Making the right call, though, can sometimes be difficult or confusing. Therefore, we all must rely on one another and our company resources to help us determine the right course of action. This is why tools like our Code of Business Conduct and Ethical Standards exist. Please take the time to review our Code. It can help us navigate many of the compliance issues we may face. While our Code cannot cover every possible issue, it does provide us all with important resources to understand the right questions to ask and how to report concerns.

Regardless of our global location, as DNOW employees, we should consider integrity and ethics our principal responsibility and always be ready to speak up when we have any questions or we believe misconduct has occurred. We should know that DNOW takes retaliation against those who speak up seriously, those who speak up are not to be retaliated against, and DNOW will discipline those that engage in it.

With your continued help we will maintain our strong commitment to integrity and ethics while doing what we do best – servicing the needs of our customers and distributing products that deliver energy to the world.

Best Regards,



David Cherechinsky  
President and CEO

Raymond Chang  
General Counsel

DNOW is made up of **exceptional employees** around the world who deliver **unparalleled customer service.**

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# Our Guiding Principles

## Integrity

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We hold ourselves to the highest ethical standards in all that we do.

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## Safety

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We act with the highest priority on health and safety in our workplace and communities.

## Teamwork

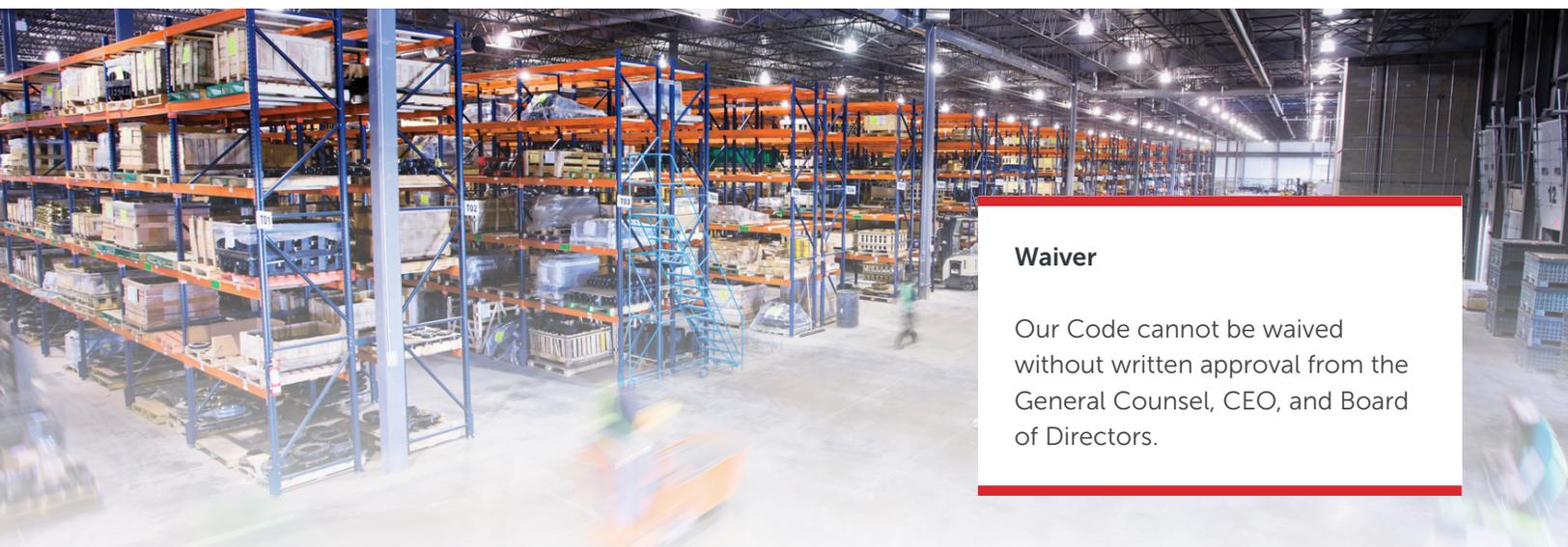
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We collaborate with our suppliers, our customers, and one another to optimize the sum of all individual efforts, while being active participants in the communities where we live and work.

## Excellence

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We are passionate about being the best in the industry, making our customers priority one, and creating long-term value for our stakeholders.



### Waiver

Our Code cannot be waived without written approval from the General Counsel, CEO, and Board of Directors.



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## Integrity Is What Sets Us Apart

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# Integrity Is What Sets Us Apart

## Our Code's Purpose

The DNOW reputation for integrity and ethics distinguishes us from others, and our Code of Business Conduct and Ethical Standards (our "Code") is both a statement of our principles and a guided handbook for all of us to use. We all have the responsibility to protect our reputation, and our Code is designed as a tool to assist in that effort.

Our Code cannot cover every issue we face, but it provides us resources for making the right decisions. We also must be familiar with all policies, procedures, and applicable laws that apply to our roles or that otherwise must be followed. The right course of action may not always be entirely clear, so DNOW encourages seeking guidance from one of our many resources.

When we fail to comply with our Code, policies, procedures, or the law, the consequences for DNOW and its employees can be severe. Repercussions can include civil and criminal penalties for both DNOW and its employees and damage to our reputations. In addition, employees could face disciplinary actions up to, and including, termination. We all must be willing to come forward to ask questions and report concerns.

## Our Shared Roles

We all must:

- Read and understand our Code
- Read and understand all policies, procedures, and applicable laws that apply to our roles
- Ask questions and report concerns
- Follow our Code and speak up, even if directed to do otherwise

## Our Leaders' Roles

Managers and Supervisors must:

- Model our values
- Promote a positive and open work environment where employees can ask questions and report concerns
- Not allow retaliation and make our non-retaliation policy clear to all
- Create learning opportunities and provide appropriate training to employees
- Watch for violations of our Code, policies, procedures, and the law
- Address compliance issues immediately and seek guidance from the Compliance, Human Resources, and/or Legal Departments



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## We Speak Up

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## We Speak Up

### Our Resources

DNOW supports its team members who seek guidance and report concerns. When we have questions or need to report a concern, there are several different resources we can use:

- Direct Manager or Supervisor
- Compliance Department
- Human Resources Department
- Legal Department
- DNOW's Ethics Hotline: [DNow.EthicsPoint.com](https://www.dnow.com/ethics)
- DNOW's Risk Mitigation: [Risk.Mitigation@dnnow.com](mailto:Risk.Mitigation@dnnow.com)

### We Do Not Tolerate Retaliation

DNOW does not tolerate retaliation against any employee for making a good faith report of any suspected misconduct or violation of our Code, policies, procedures, or the law. DNOW also does not retaliate against those who participate in an investigation. Retaliation can take many forms including demotion, discipline, or mistreatment. Those who engage in retaliation will face disciplinary actions up to, and including, termination.

A **"good faith"** report is one that the person making the report honestly believes is true and accurate.

Any employee who feels that he or she has been subjected to retaliation for making a report in good faith should immediately report the incident.

### Our Investigative Process

DNOW takes potential violations of our Code, policies, procedures, and the law very seriously and investigates all reports completely. DNOW takes steps to ensure confidentiality and makes reasonable efforts to communicate the results of an investigation to those who made the report, consistent with applicable law and circumstances. We all must fully cooperate in any investigation.

**Q:** While Stephanie is working on a new project at a customer's site, she notices that a member of the DNOW team is not wearing the required safety gear. She doesn't want to get her co-worker in trouble if he didn't mean to do anything wrong. What should she do?

**A:** She should report it immediately. The DNOW team member could be in violation of not only our Code, but also of the customer's policies. If you think you know of a potential problem at one of our worksite locations, speak up as soon as possible. You can do so without fear of negative consequences. At DNOW, we do not tolerate retaliation for good faith reporting.

Retaliation can take many forms including **demotion, discipline, or mistreatment.**



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**We Treat Each  
Other with Respect**

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# We Treat Each Other with Respect

## We Value a Respectful Workplace

Diversity at DNOW is a competitive advantage and a strength that we rely on to deliver superior products and services for our customers and create value for our stakeholders. Our diversity, combined with the way we work together as a team, is how we succeed. Being part of a team means that we all must respect each other, treat everyone fairly, and never tolerate any form of discrimination or harassment.

Harassment may be deliberate or unintended, sexual or non-sexual – it is any course of inappropriate comment, conduct, or display that is unwelcome or offensive to the recipient. DNOW prohibits and does not tolerate harassment of its employees or improper interference with the ability of its employees to perform their job duties.

You must report harassment whether you experience it or you see others experiencing it.

**“Harassment”** is a type of discrimination that generally includes any form of unwelcome conduct towards another with the purpose or effect of creating an intimidating, hostile or offensive work environment, or that interferes with work performance.

Harassing behavior can include, but is not limited to:

|                 |   |
|-----------------|---|
| <b>Physical</b> | Touching<br>Hugging<br>Massaging                                |
| <b>Verbal</b>   | Racial or ethnic slurs<br>Offensive comments<br>Offensive jokes |
| <b>Visual</b>   | Offensive photos<br>Offensive videos<br>Offensive drawings      |

DNOW makes employment-related decisions based solely on merit and performance and never on characteristics such as:

- Race
- Color
- Gender Identity
- Age
- Religion
- Disability
- Sexual Orientation
- Marital or Family Status
- National Origin
- Veteran Status

**Q:** Simon is a manager responsible for hiring at his local facility. One of the applicants for a new job is from Simon’s high school. Is it a problem if Simon decides to offer the job to the applicant solely because they went to the same school?

**A:** Yes. It is a violation of our policy as we make employment related decisions solely on merit and performance. In this situation, Simon must make his manager aware, so he or she can determine how to proceed.

## We Work Safely

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Our health and safety, as well as the health and safety of our fellow employees, vendors, customers, and visitors, must be a priority. We must make sure that we know and follow all health, safety, environmental, and security guidelines that apply to our roles or the facilities where we work.

DNOW is committed to maintaining a safe workplace for its employees, vendors, customers, and visitors and extends this commitment to our customers' worksites and all other locations where DNOW conducts business. DNOW forbids the use or possession of alcohol (without proper authorization), drugs, drug paraphernalia, and controlled substances while working on behalf of DNOW, while working in collaboration with DNOW or while on DNOW property. Improper use of prescription drugs is also forbidden while on DNOW premises and during the conduct of DNOW business.

DNOW is committed to keeping our work environment free from the threat of violence. We should speak up if we know of the threat of a violent or potentially violent situation.

Speak up immediately if there is any belief of a possible health, safety, environmental, or security concern. Contact the HSE Department or DNOW's Ethics Hotline to report a concern or with any questions.

## We Protect Privacy

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We collect and manage the personal information of our fellow employees with care. We comply with all applicable privacy laws and only collect, process, use, and retain personal data when we have a business need or where required by law. If your role involves collecting, processing, using, or retaining employee personal data, you may not collect, use, or disclose the personal data except as needed to perform your job. Misuse or abuse of personal data is a violation of our Code, and may subject an employee to disciplinary actions up to, and including, termination.

If you have any questions about privacy or suspect or know of the misuse or unlawful disclosure of personal data, report it to [Privacy@DNOW.com](mailto:Privacy@DNOW.com).



DNOW is committed to maintaining **a safe workplace** for its **employees, vendors, customers, and visitors**.



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## Our Commitment to DNOW

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# Our Commitment to DNOW

## We Avoid Conflicts

We must always act with the best interests of DNOW in mind. A key way to accomplish this goal is to avoid conflicts of interest and make sure to disclose any potential conflicts to the Legal Department as soon as we become aware of them.

A **“conflict of interest”** can arise when an employee’s personal interests interfere, or potentially interfere, with the interests of DNOW.

Common potential conflicts of interest include:

- Accepting outside work that could interfere or conflict with our DNOW role
- Doing personal business with DNOW competitors, customers, or business partners while acting on behalf of DNOW
- Using DNOW resources, such as facilities and equipment, for our own personal benefit
- Owning or controlling an interest in a DNOW competitor
- Receiving a personal benefit from decisions made on behalf of DNOW

If in a managerial or supervisory role, we should not supervise immediate family members or close friends. If immediate family members or close friends are simultaneously employed by DNOW or a business partner, those personal relationships must not create any appearance of favoritism or conflict of interest.

While having a **conflict of interest** is not necessarily a violation of our code, **failing to disclose it is**.

**“Immediate family”** includes spouses, children, stepchildren, parents, stepparents, siblings, in-laws, and any other member of your household.

Conflicts of interest can be a complex topic. If you have any questions or wish to disclose a potential conflict of interest, please contact the Legal Department.

**Q:** Tessa is working on a project with a supplier. The supplier decides to drop out as the project begins, and it could take months to find a new supplier. Tessa’s cousin runs a company that could supply the project. Can Tessa hire her cousin’s company to do the work?

**A:** Tessa could potentially hire her cousin’s company, but first she must inform the Legal Department of the conflict of interest for transparency and to ensure that the decision to move forward with this particular supplier is made in the best interests of DNOW.



## Our Commitment to DNOW

### We Keep Accurate Records

We can only be successful if we have complete and accurate records. Our stakeholders expect us to act with integrity and ethics and to be transparent about our business. Our business records must accurately reflect all of our assets, liabilities, revenues, and expenses. We must not only follow all of our internal controls, policies, and processes for record retention, but we must also make sure that DNOW is compliant with all regulatory requirements.

We Do Not:

- Distort or disguise the true nature of any transaction
- Make inaccurate representations
- Establish any undisclosed or unrecorded funds or assets

If your role includes financial or accounting responsibilities, you must ensure that financial disclosures are always complete, fair, accurate, timely, and understandable. Anyone who has such a role must be familiar with and adhere to all legal and regulatory requirements as well as internal controls. You also have a duty to come forward and contact the Internal Audit Department if you detect any issues or deficiencies in DNOW's reporting.

**Business Records** include documents, in any form, that records an act, condition, or event related to business.

Everyone who keeps records must be familiar with our policies, procedures, and our legal or contractual requirements for retaining documents and records, including the timing and conditions under which records can be destroyed. If we are unsure what policies and procedures might apply, contact a direct manager or supervisor.

If we receive a notice to provide documents in our control, we should preserve the requested records and contact the Legal Department. We may not alter, conceal, or destroy anything that is requested, nor ever suggest to others that they destroy or alter records either.

From time to time, we may be called on to cooperate with external or internal auditors or government investigators. We endeavor to fully and courteously comply with all valid requests to the extent required. If notified of an investigation, litigation, proceeding, or records request, please contact the Legal Department.



## We Protect Confidential Information

Employees with roles that require collecting, processing, using, or retaining confidential information (belonging to DNOW or a third party) must ensure that the confidential information is protected. Confidential information must never be shared with anyone inside or outside of DNOW who does not have a business need to know the information. We also must take care when we use or discuss confidential information in public or in other situations where it may be compromised. Our obligation to protect confidential information continues even after we leave DNOW. Prior approval from the Legal Department must be obtained before the release of any confidential information.

Confidential Information can include:

- Trade secrets
- Intellectual property (IP) such as patents, processes and process improvements, trademarks, and trade names
- Business, marketing, and service plans
- Technical information
- Customer information, including lists
- Financial information
- Human Resources information
- Contractual obligations
- Employee information
- Litigation information



## We Protect Our Assets

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Our assets are the tools that allow us to provide excellent products and services to our customers. We must all use them carefully and protect DNOW's assets as we would our own personal assets. If you suspect any misuse or theft of DNOW assets, you must report it immediately to the Ethics Hotline or the Legal Department. We may occasionally use DNOW equipment and other assets for personal reasons, if such usage is authorized and the activities and products generated are not used for our or others' personal gain. When using DNOW assets, we should not have any expectation of privacy. DNOW reserves the right to monitor the use of systems such as the internet and email as permitted by applicable law.

DNOW assets include our intellectual property (IP), which can include anything that we create while employed by DNOW, such as patented equipment, processes, trademarks, and logos.

DNOW assets also include all technology, such as communication systems, computers, software, networks, cell phones, email, and other systems and applications. We must use these assets with care and avoid compromising security by sharing passwords or other types of login information.

When using DNOW assets such as computers and cell phones, we do not access, download, send, or view illegal, libelous, inappropriate, sexually explicit, offensive, or harassing materials. We do not use DNOW assets to send unauthorized solicitations, distribute unauthorized material, or conduct business for ourselves or other organizations. We also do not transfer DNOW data or resources without prior approval from our manager or supervisor and the Legal Department.

We do not use or distribute unauthorized copyrighted material, nor do we violate the intellectual property (IP) rights of others.

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**Q:** John received an email from a coworker making crude jokes about a particular race. He wants to send it to his friend outside of DNOW. Can he forward it on since the recipient doesn't work for DNOW?

**A:** No. The coworker's use of DNOW assets to send potentially offensive material inside or outside DNOW is a violation of our Code. John should refrain from sending it to anyone and should delete the email immediately to discourage additional violations of our Code. After deleting the email, John is obligated to report the Code violation his coworker committed in sending the email by either alerting his manager or using the DNOW Ethics Hotline.

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**Our assets are the tools that allow us to provide excellent products and services to our customers.**

### We Provide Quality

We meet our customers' expectations by:

- Providing safe products
- Complying with quality controls
- Following all laws and regulations
- Following all internal control procedures
- Meeting all contract specifications

We also expect our suppliers to assure and maintain the quality of their products and services.

### We Treat Suppliers Fairly

We select our suppliers objectively based on their merit and follow all of our internal rules and processes for bidding, sourcing, and purchasing. We do not select suppliers based on any personal benefit or because of any kickbacks.

We also expect all of our suppliers to follow the principles in our Code.

A **"kickback"** is a payment made to a DNOW employee as a reward for securing business or influencing decisions.

### We Communicate Responsibly

Our reputation is based on hard work and a focus on providing superior products and service while maintaining our integrity and ethics. We cannot afford to damage our reputation with our customers or the community by either intentionally or accidentally providing inconsistent or false public statements. DNOW employees may not speak publicly about or on behalf of DNOW unless his or her role specifically allows it. Only those employees designated to speak for DNOW should handle outside inquiries from stakeholders, analysts, or the media. Requests for comments or information should be referred to the Legal Department.

When we speak in public, including using social media and other public forums, we must be careful of what we communicate. We must never leave the impression that we are speaking for DNOW, or violate any provision of our Code or our policies, such as revealing confidential information or engaging in harassing conduct.

Some considerations when posting on social media include:

- What you post is public, possibly forever
- Our Code and our policies apply everywhere
- It must be clear that you speak for yourself and not for DNOW

Our reputation is based on **hard work** and a focus on providing superior products and service while maintaining our **integrity** and **ethics**.

## We Do Not Trade on Inside Information

DNow, our customers, and our partners entrust us with vital and sensitive information. Buying and selling stock by using material information or non-public information (collectively "inside information") or telling someone else inside information so they may buy or sell stock (also known as insider tipping) are violations of our Code, policies, procedures, and the law and can lead to serious fines and penalties.

**"Material information"** is any information that a reasonable investor would consider important in deciding to buy or sell a company's securities.

This area of the law can be complex, so if you have questions about whether you possess material information, non-public information, or whether you can trade in any DNow securities, contact the Legal Department before acting.

Information is considered **"non-public"** if it has been not provided to the public or it has been provided but adequate time has not passed for the markets to digest the information.

**Q:** Zahara recently learned about new products DNow will soon be offering. No one outside our company knows about these new products. She is planning to buy stock before this information becomes public and the price goes up. Is this allowed?

**A:** Absolutely not. Federal laws and our Code prohibit her from making company-related securities transactions if she is aware of material or non-public information concerning DNow through her employment.





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## Our Commitment to Our Communities

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## Our Commitment to Our Communities

### We Uphold Human Rights

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Our mission and values reflect our unwavering respect for human dignity and fundamental human rights. We do not use or condone the use of child, forced, indentured, or involuntary labor in any of our work. We promote the health and safety of our employees and comply with all applicable fair wage and hour laws.

We also expect everyone with whom we conduct business to observe similar standards respecting human rights. We will not knowingly conduct business with – and will terminate business dealings with – any supplier or other business partner who violates these standards.

### We Protect the Environment

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Innovating and exceeding expectations is more than just our philosophy for business: it is how we approach our responsibilities. This includes our responsibility to protect the environment of the communities in which we work. DNOW has developed policies and procedures for reducing the negative impact of our operations on the environment.

We must be aware of our impact on our surroundings at all times, and be prepared to seek guidance and report potential environmental concerns to DNOW's Ethics Hotline.

### Reasonable Political Contributions

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DNOW respects employees who want to be involved in their communities and with causes that are meaningful to them, including engaging in the political process. However, we must be careful to never directly or indirectly indicate that we are acting on behalf of DNOW when expressing political beliefs. We cannot use or provide any company resources when engaging in the political process, including using company time, property, or personnel, without the prior approval of the General Counsel or Chief Compliance Officer. We must also never seek to be reimbursed by DNOW for political contributions we make. Please refer to our Anti-Corruption and Anti-Bribery Policy for more information.

For questions about DNOW's political activity or contributions, or if you ever feel coerced to participate in or contribute to any political activity, please contact the Compliance Department or Legal Department.

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**Q:** Hans wants to help with the campaign for a local political candidate. There is a meeting coming up, and he agreed to print 100 flyers. He knows that the copier at the DNOW facility where he works regularly is used for many copies a day, so he waits until after office hours to print the flyers. Is this okay?

**A:** No. Unless Hans secured prior approval from the General Counsel or Chief Compliance Officer, his use of DNOW assets for the candidate's political cause is a violation of our Code and our Anti-Corruption and Anti-Bribery Policy.

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Innovating and exceeding expectations is **more** than just our **philosophy for business**: it is how we approach **our responsibilities**.



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**Our Customers  
Are Priority One**

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## Our Customers Are Priority One

### We Do Not Bribe

We win business with superior service and by being ready to meet the needs of our customers. We do not cut corners. We neither bribe nor engage in any corrupt activity.

We do not give anything of value to any person, including a commercial partner or a government official, to gain or retain any business, secure a business advantage, or otherwise influence any business decisions.

It is against DNow policy to make facilitation payments. However, in the rare situation where an employee is threatened with imminent physical harm if the facilitation payment is not made, the payment can be made. DNow considers this to be extortion. Any request for facilitation payments, whether paid or not, must be reported immediately.

We always:

- Act carefully when we give gifts or entertainment
- Keep accurate track of our business expenses and never misallocate them or provide false information
- Make sure those who represent us, including consultants, agents, and contractors, follow these same rules: no one can bribe on our behalf
- Refuse kickbacks or any fees given back to secure business or influence decision-making
- Follow our Anti-Corruption and Anti-Bribery Policy

A **"government official"** can be someone employed by a government or an employee of a business that is owned or controlled by a government, such as an engineer who works for a state-owned oil company. It also can include politicians and those who work for international bodies like the World Bank.

When giving gifts or providing entertainment, we must carefully follow the rules described in our Anti-Corruption and Anti-Bribery Policy as well as our Gift Giving and Entertainment Policy to make certain that any gift given or entertainment provided would not be considered a bribe.

**"Anything of value"** can be almost anything, including money, gifts, favors, entertainment, and opportunities.

The topic of bribery and corruption can be complex, and anti-corruption laws have severe penalties. Please contact the Compliance Department if you have any questions or concerns. Always seek help before you engage in behavior that might violate our Code, policies, procedures, or the law.

A **"facilitating payment"** is a payment made to a government official to expedite or complete a routine governmental action.





## We Give Gifts and Entertainment Responsibly

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When conducting our business, it is not uncommon to exchange gifts or provide entertainment. However, giving and receiving gifts and entertainment must always follow our Code, policies, procedures, and the law.

We do not want to give or receive any gift or entertainment that could be seen as a bribe or an improper attempt to influence our or others' business decision-making. Gift and entertainment issues can be surprisingly complex. We must keep records of gifts given to government officials, and in some cases, we must obtain approval from our manager or supervisor and the Compliance Department before we can give the gift. When giving gifts or providing entertainment, we must carefully follow the rules described in our Anti-Corruption and Anti-Bribery Policy as well as our Gift Giving and Entertainment Policy. Do not hesitate to contact the Compliance Department with any questions or concerns.

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Gifts or entertainment should never be:

- Frequent or lavish in value
  - An attempt to influence a business decision
  - Solicited or requested
  - Comprised of cash or cash equivalents (such as gift cards)
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**Q:** Campbell is trying to win a new project with a state-owned oil company and has been told that working with a specific agent will help land the project. The agent tells Campbell during their conversation that he can “get things done.” Campbell explains to the agent that there is a due diligence process for agents, brokers, and consultants. The agent tells Campbell, “Those investigations take too long, and I’m not interested.” What should Campbell do?

**A:** He should report this interaction to the Compliance Department; Campbell cannot continue discussing the project with the agent until he is willing to engage in our due diligence process and has been approved by the Compliance Department.

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Gift and entertainment issues can be **surprisingly complex.**



## We Compete Fairly

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Even as we innovate, compete vigorously, and exceed expectations, we never lose sight of our focus on integrity and ethics. We follow all applicable competition laws everywhere we operate, and we make sure that we are accurate and truthful when we discuss the quality, features, and availability of our products or services. Additionally, we do not make inaccurate or misleading claims about our competitors or their products and services.

We also never make formal or informal agreements with customers, suppliers, partners, or competitors that are or could be seen as anti-competitive. This means that we do not discuss any of the following with our competitors:

- Pricing, pricing policy, costs, or marketing or strategic plans
- Proprietary or confidential information
- Division of customers, markets, territories, or countries
- Agreements to boycott customers, suppliers, or competitors

We must be familiar with our Code, policies, procedures, and laws that apply to our roles, particularly those positions that are responsible for trading and sales activities.

When attending events where competitors are present, such as trade shows, conferences, and other similar gatherings, we should not discuss confidential DNOW information. Should a competitor try to discuss such information with us, we must stop the conversation immediately and promptly report the conversation to the Legal Department.

We only collect competitor information that is public and gathered lawfully and ethically. Competition laws can be complex, so please refer to our Antitrust Policy Guide for more information and contact the Legal Department for additional guidance.

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**Q:** Freddy has just joined DNOW from a competitor. He wants to give the team some confidential marketing information that he helped develop during his time with the competitor. Is this okay?

**A:** No, this would violate our Code, policies, procedures, and potentially applicable law. Freddy has an ongoing obligation to his former employer to keep its information confidential. He and DNOW have a duty to protect the competitor's information and not use it for our benefit.

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We only collect competitor information that is **public and gathered lawfully and ethically.**

## We Protect Customer, Partner, and Third-Party Information

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We protect confidential information that has been entrusted to us whether it comes from our customers, suppliers, partners, or other third parties. We carefully follow all the terms of our agreements with third parties, never misuse any third-party information, and never violate or infringe on intellectual property rights, including those for trademarks, patents, software, licenses, or other material that we may use in our work.

## We Follow Trade Laws

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DNOW operates globally, and we all must work carefully to ensure that we comply with all trade laws that impact how we move products, provide services, and conduct our business internationally. Our goal is to be innovative and customer-focused while still maintaining integrity and ethics by following our Code, policies, procedures, and the law.

Anyone whose role involves the importing or exporting of our products, services, or any technology must be familiar with the rules and processes that govern international trade.

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**Q:** Ann has been working on a contract to sell spare parts to a company overseas. The customer has requested a clause in the contract stating that none of our product parts are to originate in Israel. What should Ann do?

**A:** A document that contains this or other types of boycott language should be placed on hold and reported immediately to the Compliance Department. Should Ann fail to report this, fines or penalties may be handed down for both DNOW and herself.

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We always:

- Properly classify goods and obtain necessary licenses for their import or export
- Verify the eligibility of the recipient to receive the imported or exported goods
- Contact the Compliance Department with any questions or concerns

We also must follow anti-boycott and other applicable laws that prohibit us from participating in any unsanctioned boycott of, or refusal to do business with, any country, company, organization, or individual. If we are asked to participate in a boycott, officially or unofficially, we must report that request immediately to the Compliance Department.

Some countries, including the United States, may restrict or prohibit conducting business with a particular country, company, organization, or individual. Anyone whose role involves conducting business with such entities must be aware of our rules and processes for such business and make sure we comply with sanctions laws.

Trade laws, boycotts, and sanctions can be confusing and complex. If you have any questions about how our Code, policies, procedures, and the law apply to your role, please contact the Compliance Department.

Trade Laws can be complex and change frequently, it is important to reach out to the Compliance Department for assistance with international business requirements.

## We Work Honestly with Our Government Customers

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We provide products and services to our government customers with the same attention to customer service and integrity and ethics we bring to all our business. Our government customers often have contracting and solicitation processes and rules that can be confusing and differ from those of a non-government customer, including the obligation to follow the provisions of the Federal Acquisition Regulations (FAR). We must obtain written consent from the Legal Department before negotiating any government contract or government sale.

## We Prevent Money Laundering

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Money laundering is the process of concealing the true origin of illicit or illegal funds through transactions that appear to be legitimate. It can include funds from activities such as terrorism, drug trafficking, fraud, bribery, smuggling, and robbery. We do not facilitate or support the process of covering up the source of such funds through DNOW's business.

We should be able to avoid these issues by knowing our customers and partners well and conducting our due diligence. If a party with whom we are conducting business refuses to provide transaction details or information about their identity, or if we have concerns about a payment or transaction, immediately report such concerns to the Compliance Department.

## We Do Not Facilitate Tax Evasion

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We do not tolerate tax evasion in the workplace. Our employees should not feel pressured into offering or agreeing to assist or enable another person to unlawfully evade tax to secure business. If at any time a concern arises regarding whether a transaction or activity includes tax evasion or criminal facilitation of tax evasion, you should raise these concerns to the Compliance Department immediately.





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**Corporate Headquarters**

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