



SUBJECT: Export Controls and Economic Sanctions Policy

Effective Date: 05/13/2014

SCOPE: ALL EMPLOYEES

Revision Date: 03/15/2026

PURPOSE

The **Export Controls and Economic Sanctions Policy** (this "Policy") summarizes the applicable provisions of the Export Controls and Economic Sanctions and sets forth the procedures to be followed by directors, officers, employees, agents and representatives of DNOW Inc. ("DNOW") and its subsidiaries globally (collectively referred to as the "Company"). This Policy was established to prevent the Company from supplying products to or otherwise transacting business with sanctioned countries, individuals, or entities as designated by the United States government, European Union or by any government or agency in applicable jurisdictions where DNOW operates.

APPLICABILITY

This Policy applies to the Company officers, directors, employees, agents, distributors, and representatives globally.

RESPONSIBILITY

Senior management of DNOW, with the advice of the compliance department, shall have ultimate responsibility for the implementation of this Policy. Company corporate officers and managers (hereinafter collectively "Management") are, within their respective segments of the Company, responsible for taking all appropriate steps to ensure compliance with this Policy, and to detect and prevent violations of applicable export controls and economic sanctions.

Management is responsible for disseminating this Policy to all Company personnel who report to them.

POLICIES

DNOW policy prohibits doing business with companies or individuals located in Cuba*, the Crimea, Donetsk, and Luhansk regions of Ukraine, Iran*, Russia, or North Korea.

* Due to risks associated with U.S. sanctions regulations and origin verification, the Company has implemented a global policy prohibiting all subsidiaries, from conducting business in or with Cuba and Iran.

MANDATORY COMPLIANCE

DNOW is committed to strict compliance with all export controls and economic sanctions as they apply to the Company and its operations. It shall be a condition of employment that all employees become familiar with and comply with this Policy.

The Company, and its officers, directors, employees, agents, and representatives shall comply, in all respects, with export controls and economic sanctions to the full extent that they are applicable. An overview of export controls and economic sanctions requirements are set forth in more detail on the Corporate Compliance intranet site.



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Should any Company officer, director, employee, agent or representative require clarification on issues regarding compliance with export controls or economic sanctions, contact DNOW's compliance department at Corporate.Compliance@dnw.com.

PENALTIES FOR NONCOMPLIANCE

Violations of export controls or economic sanctions can result in criminal prosecution, administrative enforcement actions and severe penalties, both for the Company and for the individual(s) who are involved, including imprisonment and fines.

Failure to comply with applicable export controls or economic sanctions requirement represents grounds for disciplinary action by the Company, up to and including termination.

EXPORT CONTROLS AND ECONOMIC SANCTIONS, EDUCATION AND TRAINING

The compliance department will keep Management and other relevant employees educated with respect to export controls and economic sanctions by:

- Maintaining information regarding export controls and economic sanctions on the Company intranet; and,
- Providing training for Management and employees on an as needed basis.

RECORDKEEPING

The Company shall maintain full and accurate records of all transactions that are subject to export controls or economic sanctions requirements. All such transactions must be authorized by regulation or by a license issued by the applicable government entity. Such records must be retained for at least five years from the date of the transaction.

REPORTING VIOLATIONS

If you suspect or believe that a violation of this Policy has occurred, you should report it to the confidential DNOW Risk Mitigation Hotline.