

Integrity Guide for Suppliers, Contractors, and Consultants

This guideline also applies to consortium partners.

Cactus International is committed to unyielding integrity and high standards of business conduct in everything we do, especially in our dealings with Cactus International suppliers, contractors, consortium partners, and consultants (collectively “Suppliers”). Cactus International bases its Supplier relationships on lawful, efficient, and fair practices, and Suppliers must adhere to applicable legal and regulatory requirements in their business relationships as set out in this Cactus International Integrity Guide for Suppliers, Contractors, and Consultants (the “Guide”) in connection with their activities for Cactus International.

Suppliers are responsible to ensure that they and their employees, workers, representatives, suppliers, and subcontractors comply with the standards of conduct set out in this Guide, our Social, Human and Labor Rights Policy Statement, and in other contractual obligations to Cactus International. Please contact the Cactus International manager you work with or any Cactus International Compliance Resource if you have any questions about this Guide or the standards of business conduct that all Cactus International Suppliers must meet.

Responsibilities of Cactus International Suppliers

You, as a Supplier to Cactus International, agree:

Fair employment practices: to (i) observe applicable laws and regulations governing wages and hours, recruitment, and employment contracts; (ii) allow workers to choose freely whether to organize or join associations of their own choosing for the purpose of collective bargaining as provided by local law or regulation; (iii) prohibit discrimination, harassment, and retaliation; (iv) upon end of employment, reimburse return transportation costs for workers recruited from outside the country; (v) not charge workers recruitment fees or utilize firms charging workers such fees; (vi) not utilize fraudulent or misleading recruitment practices; (vii) not hold or destroy a worker’s identity or immigration documents; and (viii) provide workers with terms and conditions of employment in a language the worker understands; and (ix) when applicable comply with the Australian and United Kingdom Modern Slavery Laws, the Norwegian Transparency Act, and other laws enacted to protect human rights and prevent modern slavery.

Human rights: to (i) respect human rights of your employees and others in your business operations and your activities for Cactus International ; (ii) not to employ workers younger than sixteen (16) years of age or below the applicable minimum age, whichever is higher and not to employ workers younger than eighteen (18) years of age for hazardous and /or high-risk work; (iii) not to use forced, prison, or indentured labor, or workers subject to any form of physical, sexual or psychological compulsion, exploitation, or coercion, or to engage in or abet trafficking in persons; (iv) to adopt policies and establish systems to procure tantalum, tin, tungsten, and gold from sources that have been verified as conflict free; and (v) to provide supporting data on your supply chain for tantalum, tin, tungsten, and gold to Cactus International when requested, on a platform to be designated by Cactus International .

Health, safety, and environment: to (i) comply with applicable environmental, health, and safety (“HSE”) laws and regulations and Cactus International ’ contractor HSE requirements; (ii) to supply to Cactus International materials containing plant materials or their derivatives that are legally sourced, harvested and exported from their country of origin; (iii) to provide workers a safe and healthy workplace; (iv) not to adversely affect the local community; and (v) to operate in a manner to protect and preserve biodiversity and comply with all laws relating to protection of biodiversity. If housing is provided or arranged, it must meet host country safety standards.

Energy Consumption and Greenhouse Gas Emissions: to (1) carry out initiatives to increase energy efficiency and reduce GHG emissions that are appropriate to their size and resources; (2) to track and document significant energy consumption and GHG emissions at the appropriate facility or company level; and (3) to provide data or information on the implementation of energy efficiency and GHG emissions reductions programs upon request.

Materials Restrictions: to adhere to all applicable laws, regulations and Cactus International requirements regarding prohibition, disclosure, or restriction of specific substances in products and manufacturing. This includes, but not limited to, labeling for recycling and disposal, such as REACH, RoHS, and the Waste Framework Directive. At Cactus International’s request, suppliers are expected to provide data regarding substances in any materials supplied to Cactus International that may require disclosure to governmental bodies, business partners or customers.

Working with governments, improper payments, and dealings with Cactus International employees and representatives: to (i) maintain and enforce a policy requiring adherence to lawful business practices, including a prohibition against bribery of government officials, (ii) not to offer or provide, directly or indirectly, anything of value, including cash, bribes, gifts, entertainment, or kickbacks, including offers of employment, or participation in



a contest, game, or promotion, to any Cactus International employee, representative, or Cactus International customer or to any government official in connection with any Cactus International procurement, transaction, or business dealing, and

(iii) to provide supporting data to Cactus International when requested.

Conflicts of Interest: to (i) ensure that nothing your company does should interfere or appear to interfere with your responsibility towards Cactus International ; (ii) disclose any conflict of interest which may interfere or have the potential of interfering with your responsibilities towards Cactus International ; and (iii) disclose any relationship (and provide updates from time to time) your company may have with any Cactus International employee, officer, director and/or anyone who represents Cactus International . Your responsibility, includes but is not limited to the following: (1) reporting to Cactus International if a Cactus International employee, family member and/or anyone who represents Cactus International owns a portion of your business, (2) reporting to Cactus International if a family member of a Cactus International employee will be working in your company on Cactus International ' business, (3) reporting to Cactus International if your company has provided anything of value to any Cactus International employee, officer, director and/or anyone who represents Cactus International .

Competition law: not to share or exchange any price, cost, or other competitive information or engage in any collusive conduct with any third party with respect to any proposed, pending, or current Cactus International procurement.

Intellectual property: to respect the intellectual and other property rights of Cactus International and of third parties, including all patents, trademarks, and copyrights.

Security and privacy: to (i) respect privacy rights and secure the data of Cactus International employees, customers, and suppliers (collectively, "Cactus International Data"); (ii) implement and maintain physical, organizational, and technical measures to ensure the security and confidentiality of Cactus International Data in order to prevent accidental, unauthorized or unlawful destruction, alteration, modification, or loss of Cactus International Data, misuse of Cactus International Data, or unlawful processing of Cactus International Data; and (iii) protect Supplier operations and facilities against exploitation by criminal or terrorist individuals and organizations.

Trade controls and customs matters: to (i) not transfer Cactus International technical information to any third party without the express written permission of Cactus International ; (ii) comply with all applicable trade control laws and regulations in the import, export, re-export, or transfer of goods, services, software, technology, or technical data including any restrictions on access or use by unauthorized persons or entities; and (iii) be cognizant of US Antiboycott laws, regulations, and guidelines and not to take any action or inaction that could expose Cactus International to liability or penalties under US Antiboycott laws.

Management accountability and responsibility: to adopt or establish a management system that (i) is consistent with this Guide and applicable laws and regulations; (ii) includes processes to identify and control HSE, business ethics, labor, human rights, and legal compliance risks associated with your operations; and (iii) requires periodic self-assessments of your operations and audits of your supply chain to ensure compliance with this Guide.

Controllershship: to ensure that all invoices and any customs or similar documentation submitted to Cactus International or governmental authorities or audited by third parties in connection with transactions involving Cactus International accurately describe the goods and services provided or delivered and the price thereof and ensure that all documents, communications, and accounting are accurate and honest.

How to raise a question or concern

Subject to local laws and any legal restrictions applicable to such reporting, each Cactus International Supplier is expected to inform Cactus International promptly of any concern related to this Guide affecting Cactus International, whether or not the concern involves the Supplier, as soon as the Supplier has knowledge of such an occurrence. Cactus International Suppliers also must take such steps as Cactus International may reasonably request to assist Cactus International in the investigation of any such occurrence involving Cactus International and the Supplier. If Supplier's work is related to a US government contract, Supplier must notify Cactus International of any alleged non-conformance with this Supplier Integrity Guide.

I. **Define your question/concern:** who or what is the concern? When did it arise? What are the relevant facts?

II. **Prompt reporting is crucial**—a question or concern may be raised by a Cactus International Supplier as follows:



- By discussing with a cognizant Cactus International Manager; OR
- By calling the Cactus Cares Hotline
 - United States: 1 (800) 279-4038
 - Australia: 1800 196 077
 - Canada: 1 (800) 279-4038
 - China: 400 120 0490
 - India: 000 800 050 3980
 - Kuwait: +965 2206 9123
 - Mexico: 800 099 0679
 - Norway: 800 62 140
 - Qatar: 00800-101-667
 - Saudi Arabia: 800 850 0314
 - Singapore: 800 492 2322
 - Thailand: 1 800 012 652
 - United Arab Emirates: 800 0320103
 - United Kingdom: 0808 149 1659
 - Vietnam: 120-32331 (Vinaphone and SPT)
 - Vietnam: 121-020128 (Mobifone Mobile Network)
 - Vietnam: 122-80078 (Viettel Network only); OR
- By going to <https://app.goethena.com/raise-a-concern/4ed80f51>
- to submit a concern through an external web portal; OR
- By contacting any Compliance Resource (e.g., Cactus International compliance team member, legal counsel, or auditor).

III. Cactus International Policy forbids retaliation against any person reporting such a concern.

Acknowledgement

Supplier Name

Signature and Name

Date