



*Core Values
& Global
Code of Ethics*



Why do we need a Code of Ethics?

A Message from our President

Premiere is approaching an exciting time as we are adding to our American-based business through global expansion and international operations; yet, it would be shortsighted to expect that this type of growth will be free from challenges.

Premiere remains committed to the heart of our business – our Team Members and their families – and is equipped to face any changes with preparedness and guidance. Premiere is duly dedicated to being a good corporate citizen by working ethically and respectfully with our partners in the communities in which we conduct business.

For our Team Members and our partners, there may be uncertainty surrounding specific situations or even dilemmas on how we should behave inside or outside of the United States. Premiere leadership understands that ethical questions and answers are not always clear-cut. Our “Core Values & Global Code of Ethics” coupled with our “Trusted Supplier Code of Conduct” (the “Codes”) should serve as a preliminary guide to aid in navigating challenging situations.

These Codes are intended to support Premiere’s Core Values and to help our Team Members and our partners live these Values while working around the world. Similarly, we want to reiterate the high standards that we hold for ourselves and our partners and the ethical conduct we expect at Premiere. Anyone doing business with Premiere, regardless of position or affiliation, is bound by these Codes and is expected to follow them.

Prior to conducting business with or on behalf of Premiere, you are expected to read and understand the Codes. Premiere holds its Team Members and partners individually responsible for following these guidelines and any corresponding policies and procedures that go along with these documents. Should you have questions regarding the Codes or any other policy or procedure, contact information has been provided within the body of the documents so that no question goes unanswered.

As we move toward a more globalized Premiere, we must continue to hold ourselves and our partners responsible for behaving ethically and acting within the local and international laws of the countries in which we operate. Individual and joint accountability is imperative for a successful and profitable future for all of us.

Kyle Mowbray

President, Premiere Inc.



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Premiere's Core Values & Global Code of Ethics

Premiere's statement of Core Values and Global Code of Ethics ("the Code") provide its Team Members a broad ethical overview, designed to aid their decision making processes and help to address certain business situations in a professional, legal and ethically responsible manner. Regardless of the location of the Team Member, Premiere has an expectation that we will take responsibility and operate under Premiere's policies and procedures while also adhering to the local rules and customs of our customers and the countries in which we operate.

PURPOSE

The Code and our Core Values, confirm our ethical obligations to the Company, our customers, contractors, partners, vendors, agents and each other. The Code and our Core Values should be observed by all Team Members at all times regardless of geographic location or employment level.

The Code and policies developed to implement it ("Policies") have been put in place to help Team Members take proactive steps when faced with ethical dilemmas. Review and attention to the Code and Policies will equip Team Members to better identify and report compliance concerns and address issues in a timely, professional and lawful manner.



SCOPE

The Code applies to every Team Member at all levels within the organization. Each Team Member has a personal responsibility to understand and act within the bounds of the Code when representing or acting on behalf of Premiere, Inc. and any of its affiliates.

If you are in a management position, you must communicate and reinforce the Code and all related Policies. As a leader, it is your responsibility to confirm that each of your reporting Team Members is in compliance. It is also understood that we require our customers, contractors, partners, vendors and agents to comply with our Code and Policies, when applicable.

The Code and Policies should be followed in conjunction with our Core Values. We each have a responsibility to ourselves and to Premiere to work and live our Core Values when we represent the company, inside and outside of the workplace.

Premiere Team Members are expected to act with integrity and fairness in all business practices no matter where they are doing business around the world. Any customer, contractor, partner, vendor, agent or any other third-party that we interact with should understand that we hold ourselves to an ethical business and legal standard and we expect the same from them.

PREMIERE'S CORE VALUES

Our Core Values, coupled with the Code, have been established to define who we are as Team Members and as a company. We have established these guidelines to help us maintain our commitment to our customers and to each other by providing parameters for conducting ourselves in an ethical and safe manner. Accordingly:

- *We will never jeopardize the safety of Team Members or others. We seek relationships with customers who value safety and service. They are the absolute foundation of our success.*
- *We strive to eliminate all communication barriers that affect safety, efficiency and opportunity.*
- *We treat our people, our suppliers and our customers with integrity, dignity and respect.*
- *We expect excellence and we take responsibility. Our business and customers require it.*
- *We succeed as a team. We tolerate and learn from honest mistakes.*
- *We passionately search for improvements in everything we do. This increases value to our customers as well as our company.*
- *We buck conventional wisdom and standards to achieve greater results. We strive to do the impossible.*
- *We are a privately held company. Our own efforts are the primary source of capital needed to sustain our success.*

In cases of ethical or safety dilemmas whose solution is not readily evident, Team Members are encouraged to take time to ask themselves the following questions:

- *Have I asked for all of the facts and reviewed those facts diligently and closely?*
- *Have I talked to my Manager or Supervisor and asked them for advice?*
- *Have I asked my peers what they would do faced with the same situation in view of the Code and Policies?*
- *Have I thought about the potential consequences of my decision and the impact it could have on my peers, my family or the company?*
- *Would I be embarrassed or feel guilty if my decision was published on the front of an international newspaper?*
- *Will I be able to sleep with the decision I have made?*



If Team Members are still unsure how to proceed, Premiere encourages you without fear of retaliation to speak candidly and ask questions about the Code, Policies or any ethical or legal issue. Premiere, Inc. has **ZERO TOLERANCE** for retaliation against any Team Member at any level when an issue is raised sincerely and in good faith.

REPORTING AN ISSUE

Should Team Members find themselves placed in a difficult ethical situation, they should stop and take steps to report the issue. Using good common sense and sound judgment—along with this Code and Policies—will be helpful in making good business decisions. Sometimes, more complicated situations may arise that require additional guidance. In these cases, Team Members are encouraged to report issues and seek help from leadership within the organization.

As Team Members, we are individually accountable for upholding the Code and Policies. If any Team Member knows of or has reason to believe that the Code, Policies and/or state, local or federal laws of the United States or a jurisdiction outside the United States (collectively “Applicable Law”) have been violated, the Team Member must report the incident. To report an issue or express concern regarding the above issues, Team Members can contact their immediate Supervisor or Executive Management. If this is not practical or the potential concern has to do with your Supervisor or Executive Management, Team Members are encouraged to contact the Ethics Hotline.

Suspected violations can be reported anonymously, where permitted by local laws, or by identifying yourself. Depending on the circumstances, Team Members should be aware that in some cases it may be difficult or impossible for Premiere to conduct a meaningful investigation of a reported potential violation that is made anonymously.

For example, if investigators cannot proceed with their work because an anonymous report does not provide sufficient detail for them to examine the issues reported or to identify the parties involved in the potential violation, they will have no one to consult for clarification. Therefore, Premiere encourages Team Members to identify themselves without fear of retaliation when reporting a potential violation.

Premiere treats all reports and all reporting Team Members as confidentially and consistently as possible and in compliance with applicable law.

FAILURE TO COMPLY

Failing to comply with the Code, Policies or Applicable Law, could subject Team Members to disciplinary action, including termination, as well as individual legal ramifications depending on the situation. We are all individually responsible for acting ethically and legally and reporting instances of unfair business practices or workplace dilemmas.

Premiere’s Compliance Program is rooted in these guidelines and every Premiere Team Member is expected to understand and implement these principles while maintaining Premiere’s high industry standards.



*In addition to these resources, you may raise your concern via the **Team Member Ethics Hotline**. The most up to date telephone contact information is located on printed signage in all District Offices and accessible via the Premiere, Inc. website.*

Taking Action

DEMONSTRATING INTEGRITY

Acting in an ethical manner is more than just complying with applicable law; it is about understanding how our Company decisions and individual decisions affect those around us. By abiding by governmentally imposed laws, we reduce our monetary risk of being subject to large fines as well as damaging reputational issues while preserving the capital and going concern of Premiere. Additionally, by considering and complying with our internal Company Policies prior to making a decision, we create a sound foundation of compliance within our organization and for our customers and end-consumers.

WORKING ABROAD

As Premiere continues to grow its international presence, we must be mindful of the local laws and customs of the countries in which we operate. Similarly, we must show respect to our customers and partners in areas outside of the United States and maintain their confidence in our operations. By holding ourselves to a reputation of strict fair-dealing and integrity, we will attract customers, partners and Team Members that will also be in agreement with acting ethically in business dealings.

When Team Members are operating in a country where local customs do not appear to adhere to the level of ethical or safety conduct that we uphold in the United States and/or in our Company Policies, we **always** are expected to maintain the highest standards of behavior to which Premiere is committed.

Premiere provides services and tools to countries outside of the United States and, therefore, when we are outside of the United States, we are subject to the local laws of that country. We are all accountable for knowing, understanding and abiding by the regulations governing the areas in which we work. If you have questions concerning local laws and customs outside of the United States, please contact the **Director of Compliance**.



Keeping our Team Members Safe

OUR RESPONSIBILITIES

We are all responsible for practicing and maintaining safety inside and outside of our workplace. Supervisors and Executive Management are key drivers of our safety protocols, policies and procedures and are expected to communicate and lead by example. We believe that safety is non-negotiable and buy-in from each Team Member is the only way to ensure that no one gets hurt.



If a Team Member observes a hazardous situation in any area of our business, he or she is required to stop the job or task and ensure the safety of our people and customers above all else.

MAINTAINING A SAFE WORKPLACE

No matter where we are working, we are expected to put **SAFETY FIRST**. Premiere is committed to protecting the health and safety of our Team Members, visitors, contractors, suppliers, partners and consumers. Our Safety Creed set forth below and Policies are put in place to help Team Members put safety first in our shops, on the highway, and in the market.

Team Members are expected to immediately report to their Supervisors if we:

- *are asked to perform a job or duty that we consider unsafe or hazardous to one of us individually or those around us;*
- *are asked to perform a task or job that we think we are not adequately trained to perform that may result in a dangerous situation;*
- *observe a Team Member or someone outside of Premiere performing a task that we think is unsafe or that the person is not adequately trained to do;*
- *believe that a vehicle or tool is not functioning properly and may be unfit for usage;*
- *see or are told about an unsafe condition or a potential hazard to one of us individually or others.*

At Premiere, safety is not optional; **everyone** is responsible for a safe and healthy work environment.

INDIVIDUAL SAFETY

Premiere sets a high industry standard of **ZERO TOLERANCE** regarding firearms, ammunition, alcohol, controlled substances and legal or illegal drugs in the workplace and on the job. Premiere prohibits violence in the workplace and the possession of firearms, explosives, and any other type of weapon or ammunition on Premiere premises is strictly prohibited.

All Team Members shall be DISA compliant and shall meet random drug test metrics, annually. Team Members are prohibited from entering Premiere, customer, contractor, partner, vendor or agent facilities to conduct business or

operate equipment if he or she is impaired by alcohol, controlled substances, legal or illegal drugs or if they are in possession of any of the aforementioned.

Premiere also complies with the Department of Transportation (DOT) job-specific safe-driving protocols and trains Team Members on the risks and responsibilities that come with driving Company and personal vehicles inside and outside of the workplace.

PREMIERE SAFETY CREED

- *WE BELIEVE...that every person bears the ultimate responsibility for keeping out of harm's way. This he owes to himself, his family and his team.*
- *WE BELIEVE...that no one lives or works entirely alone. If he fails the man beside him, he fails himself, and will share the burden of that loss.*
- *WE BELIEVE...that the true horror of an accident is the realization that a man has failed himself and his family - and more - that his team failed him.*
- *WE BELIEVE...that accidents are conceived in improper attitudes and behavior and are born in moments of action without thought.*
- *WE BELIEVE...that accidents will cease only when the right attitude and behavior is strong enough to create the environment and awareness that controls the act.*
- *WE BELIEVE...that freedom from harm is not a privilege but our absolute minimum standard to be achieved and perpetuated day by day.*

QUALITY, HEALTH AND PROTECTING THE ENVIRONMENT

Premiere's long term success depends on our commitment to focus on continuous improvement of the quality and the service of our people, tools and equipment. We seek to exceed our customers' expectations on every job by delivering high-quality performance and products.

Team Members are expected to be proactive where quality is involved and be adequately trained on our quality policies and procedures. Supervisors should continuously practice and train with a culture of quality in mind and maintain a standard of excellence in all that we do. While unanticipated, every Team Member is tasked with reporting **ANY** non-conformances immediately to the Quality Manager to ensure that quality is assured for our end-user.

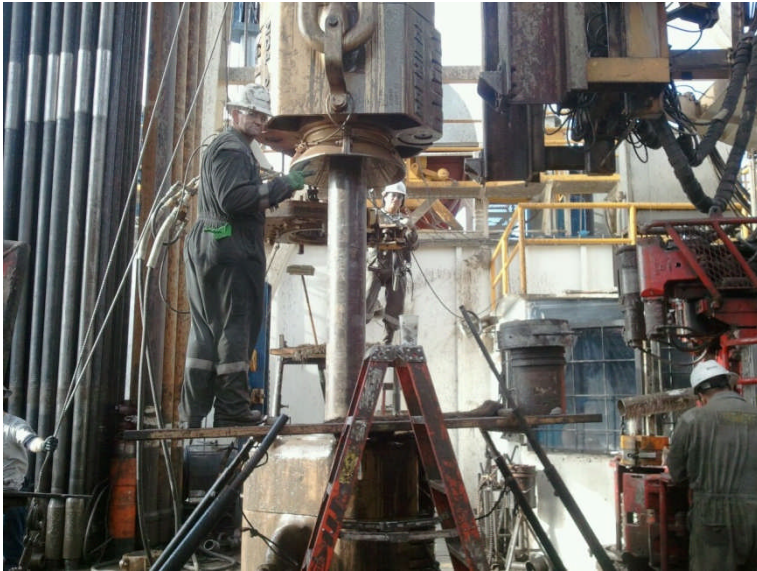
Together we are each held accountable for adhering to and upholding the quality within our individual Departments. Similarly, we are each responsible for following Premiere policies, procedures and work instructions. Premiere tool, equipment, service and Team Member Quality standards are assessed and reviewed via internal and external testing and audits on a continual basis.

COMMITTING TO HSE

From its inception, Premiere has always maintained strong Health, Safety, and Environment (HSE) practices. Not only does Premiere protect the physical health of its Team Members, but we also put the utmost responsibility on ourselves to perform jobs with a mentality of safety first, while also preserving and protecting our environment. As we expand our global footprint, Team Members are expected to recognize and respect the communities and local surroundings where they are working.

Appreciating Our Differences

DIVERSITY & ANTI-DISCRIMINATION



At Premiere, we recognize the unique characteristics that make up each of our Team Members. We are committed to seek, grow and retain Team Members with diverse backgrounds, talents and skills and we understand the benefit in different ways of thinking and interacting.

Premiere offers equal opportunities to all of our Team Members and their families. We do not discriminate against Team Members or potential new joiners in matters involving recruiting, employing, training, promoting, compensation or any other term or condition of employment. Team Members must always act in a just manner and give qualified people the opportunity to learn and develop within Premiere.

Our hiring decisions are based on qualifications, experience, quality of work, and job performance. We do not discriminate based on:

- *Race, color, ethnicity, or national origin*
- *Gender or identity*
- *Sexual orientation*
- *Age*
- *Religion*
- *Disability*
- *Veteran or Armed Forces Status*
- *Any other legally protected status*

RESPECTING EACH OTHER

Team Members are expected to interact with each other in a professional manner and foster mutual respect and trust in the workplace. Premiere does **NOT** tolerate any form of harassment inside our Company or externally with our customers, contractors, partners, vendors, agents.

Team Members should avoid speaking in an overly aggressive or hostile manner and should not conduct themselves in an unwelcome manner toward another person (e.g. impeding someone from accomplishing tasks or making suggestive remarks). If you see a Team Member being harassed inside or outside of the workplace, it is your duty to report it to the Director of Human Resources or the Ethics Hotline.

Identifying and Avoiding Conflicts of Interest

IDENTIFYING A CONFLICT OF INTEREST

A conflict between Team Members' personal interests and the interests of Premiere or one of our customers is a conflict of interest. Each of us must avoid such conflicts as well as situations that may appear to be as creating a conflict from an outsider's point of view. These types of conflicts can come about if Team Members have personal, familial, monetary, political or other interests that could intrude on our responsibilities in the workplace.

Team Members are expected to put Premiere and its interests at the forefront of their daily business activities. Team Members and their family members are prohibited from accepting any improper personal benefits as a result of their employment at Premiere.

Examples of conflicts of interest include, but are not limited to the following:

Premiere Property

Team Members can use Premiere's assets—tools, equipment, or confidential information—for proper Premiere business purposes only.

Loans to Premiere Team Members, Directors & Officers

Personal loans from Premiere to Team Members are prohibited unless prior approval is obtained by Executive Management. Loans of any type to directors or officers of the Company or any member of their families—as well as direct or indirect credit arrangements or guarantees of obligations to those individuals—are specifically forbidden.

Business Gifts

Accepting a gift from a Team Member or customer could create an appearance that you owe that person something in return. Gifts are classified as any item or benefit for which the Team Member does not pay face value.

Team Members, contractors, or partners of Premiere in the United States cannot accept any gift of more than nominal value (**USD \$20**) from any person or company that does business with Premiere or is trying to establish a business relationship with Premiere in the United States. Team members outside of the United States are not allowed to accept gifts without prior authorization from Executive Management.

Similarly, Premiere Team Members are prohibited from giving gifts of more than nominal value (**USD \$50 in the United States; USD \$40 in Latin America**) to customers, contractors, partners, vendors, agents or any other third-party without prior authorization from Executive Management.

Team Members are required to ensure that all gifts that they have given or received are logged into the Premiere Gift Registry along with the giver or recipient's full name, organization, business purpose and dollar value amount.

Gifts that are not acceptable and in violation of this policy include:

Cash Payments; Internal or External Loans with Premiere funds or Team Member funds; Excessive Entertainment & Travel or Substantial Favors or Promises

Gifts are further explained in the "Improper Payments" section of the Premiere Global Code of Ethics & Conduct related to business gifts and benefits.

See the **Improper Payments** section of the Code for more information on gifts and payments.

PERSONAL INTERESTS IN COMPETITORS OR CUSTOMERS

To avoid a conflict of interest, Team Members and their immediate family - spouse, parent, or dependent – should not have a controlling interest in any company that does business with or is a competitor of Premiere, including suppliers, vendors, contractors or third-party agents. Further, Premiere Team Members cannot serve as an Officer, Director, employee, agent or consultant of any customer, competitor or partner unless approval, along with proper documentation, is given from Executive Management.

If Team Members and/or their immediate family members must conduct a business deal directly with Premiere (e.g. renting, buying or selling equipment or property), documented prior approval by Executive Management must be obtained prior to entering into any business agreements.

CONFLICT DISCLOSURE

Selecting suppliers, vendors, contractors or third-party agents and agreeing to their quotes or fees are areas in which Team Members are encouraged to stop and think about whether or not there could be a conflict of interest involved. Team Members and Premiere should not give even the mere appearance of using unfair business practices or choosing partners due to preferential or familial biases.

If a Team Member has an on-going personal interest with a supplier, vendor, contractor or third-party agent, the Team Member should inform his or her immediate Supervisor and be removed from the account. Similarly, if a Team Member's spouse or parent is employed by a business that works with or is in competition with Premiere, this information must be disclosed to the **Director of Human Resources** at time of hire or when the Team Member becomes aware of the conflict.



Emphasizing Quality

PRODUCT QUALITY

Team Members will never compromise Premiere tool or equipment quality under any circumstances. Premiere is committed to the production of high quality products and we maintain customer loyalties by using structurally sound raw materials to build our tools from start to finish. We are also committed to designing, developing and testing our equipment in an ethical and environmentally responsible manner and follow safety standards and guidelines relating to research and development.

Team Members involved in the research, development, manufacturing or assembly of Premiere tools are expected to commit to the following:

- *Understand Premiere's equipment quality standards, policies and procedures prior to beginning work on the tool*
- *Follow safe work practices and testing protocols as outlined in Premiere's Quality System*
- *Comply with all applicable safety regulations applicable to the country in which you are operating*

Team Members should always be on the lookout for situations and quality issues that could affect our equipment and impact our people or the end-users of our products.

RESPONSIBLE MARKETING

It is each Team Member's responsibility to market and sell our products in an ethical, legal and fair manner. Premiere services, tools and equipment should be marketed to reflect our high standards and should be done with honesty and transparency to our customers and our consumers. Premiere Team Members should not engage in the following activities:

- *Overstating or misrepresenting the quality, efficiency or safety of our products*
- *Using misleading or dishonest statements when representing our services, safety record or products to customers or in the marketplace*
- *Making claims about Premiere's services or equipment without properly substantiating financial or key performance indicator figures with a Supervisor or Executive Management*

Team Members are also expected to ensure that all marketing and bidding programs conform to applicable laws and regulations of the United States as well as in the country in which the marketing activity is being conducted.



Integrity in Our Business Practices

TRANSPARENCY IN OUR ACCOUNTING & FINANCIAL REPORTING OBLIGATIONS

All accounting and financial transactions must be booked accurately and transparently in Premiere's accounting records and supporting schedules. Premiere's assets and liabilities are also stated fairly in the books of account and are included in the Company's internal accounting statements. This information is used as the basis of preparing financial statements in conformity with US Generally Accepted Accounting Principles (GAAP).

Even though Premiere is a private company, we ensure that all books of account and supporting documents are available for routine internal auditing procedures as well as a year-end external independent audit.

Premiere recognizes that any disclosure of financial information to our partners, financial institutions, or third-parties - as approved by Executive Management - will present a fair, accurate, timely and understandable picture of our financial position.

MAINTAINING BUSINESS RECORDS

It is up to every Team Member at Premiere to keep correct and fairly stated business records, from precise bidding and job tickets to transparent Accounts Payable and Payroll records, we are all responsible for accurate reporting. Team Members are not allowed to alter, falsify, or disguise the true nature of any transaction.

Business records and communications often become public, so we all must avoid exaggeration, derogatory remarks, speculation, or inappropriate characterization of people and companies. This applies equally to e-mail messages, internal memos, and formal reports.

ARCHIVING OR DESTROYING BUSINESS RECORDS

Every Department is responsible for making sure that its records are retained or destroyed according to local, state and federal laws.

At times, you may be directed by Premiere to retain documents, in electronic or paper form, in connection with certain subjects. Documents that Team Members are told to hold for retention purposes must be retained. Failure to do so could result in criminal, civil, or internal penalties, up to and including termination.

ACTING ON BEHALF OF PREMIERE

All Team Members must obtain Executive Management or Supervisor approval for any financial transaction that will be conducted on behalf of Premiere prior to engaging in the transaction.



CONFIDENTIALITY AND PROPRIETARY INFORMATION

For Premiere to succeed and thrive, we are constantly investing time, money and effort into being on the cutting edge of tool and equipment development. To keep confidential information confidential, we must guard our own trade secrets and proprietary information as well as that of our partners and customers who have shared their information with us.

At times, our partners and customers share non-publicized information with us or we find out proprietary information while doing a job for that customer or partner. Team Members are individually responsible for ensuring that this information is not used for personal gain or shared with others. Examples of proprietary information include the following:

- *In conversation on the rig floor with the Drilling Manager regarding a competitor*
- *In an Engineering skid left on the printer at the office*
- *In an email that discusses the large amount of revenue a public customer is expecting from a well, but has not yet noted in their financial statements or in a public forum*

The leakage of this type of confidential information, especially involving publically traded companies, is often heavily regulated and “insider” disclosure may lead to civil and criminal liability for a Team Member.

INSIDER TRADING

Throughout the course of their work, Team Members may have access to equipment drawings, proprietary trade secrets, financial information and other non-public information of our customers, competitors, vendors, suppliers or third party agents. If a Team Member discovers or hears of any non-public information about any company, you are expected to keep this information to yourself and are forbidden to buy or sell any of that company’s securities or options, if they are publically traded.

Due to the nature of our business, service companies and customers often have open and honest conversations with each other, sometimes not even realizing that the information being shared is private in nature. Premiere Team Members are instructed to avoid even the outside appearance of improperly using insider information for benefit or gain.

PROTECTING RESTRICTED INFORMATION

Team Members must understand and acknowledge Premiere’s policies and procedures surrounding data protection, including standard non-disclosure agreements (“NDAs”) that are sent to third parties before conducting business on behalf of Premiere as well as all internal Information Technology (“IT”) security procedures that relate to data sensitivity and privacy.

If a Team Member is privy to knowledge that is commercially sensitive or proprietary, he or she is responsible for ensuring that this information is not disclosed to any person, internal or external to Premiere, who is not authorized to receive such information, without first obtaining Executive Management or Supervisor approval. Team Members should also be cognizant of their daily activities and interactions with customers, coworkers or social acquaintances as disclosure is not always intentional; yet, could be damaging.

While speaking with a customer’s Drilling Manager out on a job, José finds out that everyone is nervous about an impending acquisition in the upcoming weeks.

Although this may be “water-cooler” talk, José tells his brother-in-law this information at a family dinner just to make small talk. José’s brother-in-law uses the information and buys a large quantity of the customer’s stock in hopes that their stock will go up once they acquire.

José, albeit unknowingly, has engaged in insider-information trading and could be fined or criminally charged for his actions.

Premiere requires that Team Members handle Company computer hardware, software, emails and programs with caution and put proper security measures in place to ensure that assets like cell phones, laptops, tablets and USB drives with Company information are not lost or stolen.

DATA PRIVACY OF INDIVIDUALS

Premiere respects the privacy of its Team Members and external parties with whom we interact. Personal information obtained or collected on behalf of any individual is regulated by internal policies and procedures that outline how we attain, use, dispose, disclose and secure such information. Personal information collection is done for lawful purposes, such as pre-employment screening and recruitment, and any Team Member that has access to personal information of another person is held accountable for following legal and internal guidelines regarding its handling.



PROTECTING PREMIERE PROPERTY

To thwart the disclosure of confidential Company information, Team Members and Supervisors are required to follow all policies and procedures that involve requesting and assigning Company property, purchasing Company assets and gaining access to district offices, shops, server folders and conference call lines and passwords.

Premiere understands that Team Members use social websites or blogs as a means of freedom of speech and self-expression, but Team Members should never claim to represent Premiere or its Management on such web sites. Team Members should also be aware of how they represent themselves online especially if they identify themselves as affiliated with Premiere. Due to its public nature, profiles and opinions expressed on the internet are not always “hidden”; therefore, Team Members should represent themselves in a manner that is consistent with Premiere’s Code, policies and procedures and Company culture.

TECHNOLOGICAL ASSETS

Premiere supplies an array of IT assets to Team Members such as computers, tablets, cell phones and servers to conduct business. All IT records, such as emails and computer files that are created using Premiere IT equipment are the property of Premiere and can be reviewed by the Company at random. Team Members cannot expect that any information transmitted on these devices to be private. Team Members are also required to offer up records and cooperate with any internal or external investigations; failure to do so may result in disciplinary action up to loss of employment.

SOFTWARE LICENSES AND COPYRIGHTS

Premiere does not allow Team Members to override the terms and conditions of any software licenses or applications. Team Members should always request authorized copies of software licenses from the IT Department and pay the fair market value of the copy. All Team Members at Premiere must follow IT Department policies’ regarding application downloads and the use of third-party software on Premiere-issued technology devices. Technology devices are provided for business purposes ONLY and should be used to further the business objectives of Premiere in a legal and authorized manner.

Competing Fairly in the Marketplace

MAKING ETHICAL DECISIONS

Premiere's reputation is defined by how we conduct business in the marketplace. As such, Premiere is committed to competing in a fair and ethical manner in all instances and relies solely on our technology and the quality of our services to win business.

The satisfaction of our customers is paramount and the basis of our business, and we refuse to compete against our competitors with deceitful or fraudulent tactics. Team Members are expected to represent the quality and the differentiators of our technology, equipment and services in a fair and accurate manner based on specific and hard facts. We do not spread false information regarding our rivals' products or services and instead, rely on technical specifics when pointing out the different features of our tools and workmanship in comparison.

Like many companies in the oil and gas industry, we source talent from various sources; sometimes, our Team Members have previously worked for a competitor. We have strict non-compete and non-disclosure clauses in our employment contracts and we respect the trade secrets and non-disclosure clauses of our Team Members' previous employers. Team Members are expected to report any disclosure of a competitor's proprietary information to their Supervisor or Executive Management who, in turn, are tasked with gaining legal advice as deemed necessary.

COMPETING LAWFULLY

Premiere does not work in tandem with our competition to "fix" the market or engage in "bid rigging." Such actions are illegal and strictly forbidden in the United States and abroad, **regardless of "cultural norms."**

Team Members are prohibited from fixing prices; assigning products or equipment to certain markets or areas; or purposefully preventing the manufacture, assembly, rental or sale of Premiere products and services or those of a competitor.



Team Members are instructed to immediately report any discussion of unethical business practices to their Supervisor or Executive Management. We do not engage in these types of conversations internally and Team Members should be aware of these topics being brought up in conversations with competitors, customers, suppliers, vendors, third party agents, etc. Team Members are instructed to avoid conversations with representatives of our competitors and are encouraged to take caution when attending trade association meetings or large conglomerate symposiums.

ANTI-TRUST LAWS

Premiere operates in many countries that have strict anti-trust laws that mandate free trade and fair competition. Team Members are all responsible for knowing and understanding these laws and abiding by them. Premiere is committed to never deliberately exposing ourselves or our people to financial penalties, lawsuits, or other legal actions related to unfair competitive practices.

TRADE CONTROLS

Premiere delivers tools, equipment and services internationally; therefore, we are required to carefully comply with all national and international laws and rules that regulate our cross border imports, temporary imports, exports, or re-exports.

The US and other countries have enacted trade sanctions or embargoes that limit or prohibit transactions with specific countries, certain individuals or entities and for certain end-goals (e.g., aiding in the creation of biological, chemical or nuclear weapons). Such sanctions are usually imposed to protect country security, enforce foreign policy, or thwart humanitarian concerns.

Premiere and its Team Members must comply with these sanctions or embargoes by performing due diligence on our international transactions and third party vendors to reasonably confirm that there is no evidence of “red flags” that would lead us to believe a customer or partner may be trying to evade trade control laws.

Before exporting any Premiere tools, equipment or services, Team Members must:

- *Review all tools, equipment and services to decide if any pre-export or pre-re-export permissions or licenses are required;*
- *Authenticate the delivery location, verify the recipients and their intended use purpose and make sure no banned end-destination, end-user, or end-use is implicated; and*
- *Obtain all required permissions and licenses, if applicable.*



Improper Payments

ANTI-BRIBERY AND ANTI-CORRUPTION

Premiere is committed to acting and dealing with integrity and as such, has a **ZERO TOLERANCE** policy regarding bribery, regardless of where we are doing business in the world.

Team Members must always comply with all national, international and US laws, regulations, acts and treaties that forbid bribing government officials, including, but not limited to, the US Foreign Corrupt Practices Act (FCPA) and Anti-Bribery/ Anti-Corruption laws of Canada and the United Kingdom.

Team Members may **NEVER DIRECTLY OR INDIRECTLY** pay, make a promise to pay, make an offer to pay, authorize the payment of money or the transfer of money, offer a gift or promise to give a gift or authorize the giving of anything of value or provide any incentive of any type to:

- Any purchaser of Premiere products or services;
- Any government official or any governmental agency or instrumentality; or
- A political party, for the purpose of obtaining an advantage or benefit related to the sale of Premiere products or services, or for influencing an act or decision of a government official or employee of any government (including a decision not to act) or to induce such person to use his influence to effect any such governmental act or decision in order to assist Premiere in obtaining or directing any business relating to the contracting for or supply of Premiere products and services.

Often, it is difficult to discern who is a government official.

National oil company representatives, passport control agents and healthcare workers can be part of the government in some countries. Similarly, political candidates and parties as well as officers or employees of any organization owned or controlled by the government would fall under this definition.

If you have questions around who is a government official, stop and call your Supervisor, Executive Management, or the Compliance Department as legal advice may be needed.

Jointly, any partner of Premiere may never accept or offer any form of improper payment while conducting business on behalf of Premiere and must always abide by all international and US laws, regulations, acts and treaties that forbid bribing government officials, including the US Foreign Corrupt Practices Act (FCPA).

Regardless of “customary norms” or “cultural business practices,” Premiere is a United States company first and is responsible for abiding by US laws at **ALL** times, regardless of physical location. Team Members are prohibited from offering, attempting to offer, authorizing or promising any type of bribe or “kickback” to a government official for the purpose of obtaining or retaining business or unfair advantage. Team Members may also never solicit or accept a bribe or “kickback.”

Commercial bribery is also strictly prohibited; bribery of this type occurs when a company provides a bribe or “kickback” to another organization in order to obtain or retain business.

Additionally, Premiere Team Members are not allowed to hire a third-party to engage in any illegal or unethical practices to circumvent the law. Allowing a third party (e.g. customs agent, freight forwarder, international partner, etc.) to indirectly make an improper payment is a violation of this Code and anti-corruption laws. Premiere Team Members must proactively and diligently screen and perform due diligence procedures on all third parties acting on behalf of the Company before engaging them.

Team Members should also be aware of extortion which occurs when a person or a group of people illegally demands or obtains money, gifts, property, or services from another person, or institution, through threats. Premiere will not abide by extortion and any instances or threats of extortion must be immediately reported to Executive Management.

FACILITATION PAYMENTS

Facilitation payments are small payments made to expedite or obtain governmental services to which the payor is entitled and are, under some circumstances, permitted under the FCPA with certain restrictions. Premiere, however, does not allow Team Members to make such payments. If you feel like you are dealing with a facilitation payment situation, report it immediately to your Supervisor, the Compliance Department and/or Executive Management. Premiere's books and records should also fairly and accurately reflect any payments made, and it is important that there are open lines of communication between Supervisors and the Accounting Department during such instances.

As the US takes a tougher stance on being better global business citizens, anti-corruption laws are becoming more complex along with tougher punishments for violators. Team Members should always avoid any action that could be deemed as bribery. Team Members should reach out to the Compliance Department with any questions around Anti-Corruption and Anti-Bribery laws, and report demands for bribes or "kickbacks" immediately.

BY EXECUTING THIS DOCUMENT IN THE SPACE PROVIDED BELOW, THE UNDERSIGNED ACKNOWLEDGES THAT SHE/HE HAS READ AND UNDERSTOOD THIS DOCUMENT AND AGREES TO COMPLY WITH THE CODE AND THE POLICIES AND AGREES TO CONDUCT HERSELF/HIMSELF IN ACCORDANCE WITH PREMIERE’S CODE OF CONDUCT.

ACKNOWLEDGEMENT

Name

Date

Signature