



FRANK'S INTERNATIONAL

Business Partner – Code of Business Conduct and Ethics

**Message from Alex Cestero, Senior Vice President, Secretary, General Counsel
and Chief Compliance Officer of Frank's International N.V.**

For over 75 years, Frank's has been committed to serving our industry with the expertise and innovation necessary to be a leader in our field. As we continue our journey, we must also continue to make a commitment to operating our business with the honesty, integrity and trustworthiness our customers and business partners have grown to expect from us. Our continued success relies on the preservation of our good reputation. We seek to earn and maintain the trust of our customers, vendors, regulators, shareholders and employees. Therefore, it is our policy to maintain the highest standards of ethical and legally-compliant behavior in all of our business activities and to avoid actions that could lead to even the appearance of improper business conduct. Because we are committed to upholding these values, we expect all of our business partners to be aware of and uphold our Business Partner – Code of Business Conduct and Ethics.

All of our business partners are expected to read, review, discuss and understand our Business Partner – Code of Business Conduct and Ethics, and to fully embrace it. If you find yourself with questions or in doubt about a decision or possible action, please seek guidance as outlined in this document.

Sincerely,



Alejandro (Alex) Cestero

Senior Vice President, Secretary, General Counsel and Chief Compliance Officer

Frank's International N.V.

This Business Partner – Code of Business Conduct and Ethics (“Code”) applies to all of our vendors, suppliers, service providers, agents, distributors and resellers, joint venture partners, consultants and intermediaries, (collectively, our “business partners”). As an overarching principle, our business partners must comply with all applicable laws and regulations governing their business activities, but the commitment does not stop there. Ethical business conduct is of paramount importance to our relationship with our business partners. The following standards, therefore, while not all inclusive, serve as guidelines to our business partners regarding our expectations for ethical business practices.

- **Anti-Bribery and Anti-Corruption:** Business partners must comply with the United States Foreign Corrupt Practices Act and the U.K. Bribery Act, as well as all other local anti-corruption and anti-bribery laws where Frank’s operates. These laws make it illegal for companies to pay or offer to pay anything of value to foreign government officials or other persons to obtain or retain business. Agents, distributors, resellers, joint venture partners, and consultants and intermediaries are subject to rigorous due diligence processes and must truthfully complete all necessary documentation and furnish all information requested of them.
- **Anti-Harassment and Anti-Discrimination:** Frank’s expects its business partners to maintain a workplace free from discrimination, where each individual has equal employment opportunity regardless of sex, race, color, age, religion, national origin, height, weight, marital status, sexual orientation, disability, or veteran status. Frank’s embraces diversity not only in its relationships with its business partners, but in its relationships with its employees, customers, shareholders and all others with whom contact is made in the normal course of business. Frank’s expects its business partners to maintain a workplace that is free from all forms of harassment, including sexual harassment. Actions of others that are inconsistent with a supportive and respectful environment will not be tolerated. Any complaint alleging harassment or discrimination will be investigated without the threat of retaliation against the individual who files the complaint.
- **Anti-Money Laundering and Criminal Activity:** Business partners are prohibited from moving, managing, facilitating, assisting or disguising the source of incoming or outgoing funds. Frank’s is committed to ensuring that all of the transactions that we enter into are not associated with criminal activities and our business partners must also be aware and committed to this practice as well. Examples of prohibited activities include, but are not limited to, tax evasion, price-fixing schemes, collusion, industrial espionage, shell companies, and hidden/disguised owners or beneficiaries. Business partners are required to report instances of such conduct when they become aware of them to their sponsor or contact at Frank’s, or to the ethics and compliance hotline described below.

- **Conflicts of Interest:** The Company expects its business partners to work with Frank's employees to identify and prevent situations where there is an actual conflict of interest or the appearance of such. Any material transaction or relationship that involves or may involve a conflict of interest or potential conflict of interest must be disclosed promptly to an authorized representative of the Company for further evaluation. Business partners shall certify that they are free from conflicts of interest either through contractual provision or on a standalone certification basis.
- **Fair Dealing and Antitrust:** Business partners are prohibited from colluding with Frank's employees to limit competition in the marketplace. Frank's endeavors to deal fairly with all business partners and expects that our business partners also follow all laws protecting free enterprise and companies and consumers from unfair business practices. More specifically, business partners are prohibited from price-fixing, bid-rigging, dividing markets/territories or customers, and restricting sales/output with Frank's employees or on Frank's behalf.
- **Gifts, Entertainment and Hospitality:** Frank's expects its business partners to adhere to our guidelines for the exchange of business courtesies such as gifts, meals and entertainment. Providing Frank's employees with cash or a cash equivalent of any kind is strictly prohibited. Acceptable forms of entertainment may include infrequent, moderate hospitality such as meals or gifts of nominal value. Unacceptable forms of entertainment include gambling or sexually oriented entertainment. Your Frank's contact can answer any questions you may have in this area.
- **Health and Safety:** Frank's expects its business partners to provide a safe and healthy work environment for their employees, subcontractors, customers, and all visitors to their premises. This includes, for example, requiring regular safety training and reviews, following all safety policies, procedures and work rules, and complying with all local and federal safety regulations.
- **Intellectual Property:** Frank's expects its business partners to protect our intellectual property and the intellectual property of others including trademarks, trade secrets, patents and copyrights.
- **International Trade:** Compliance with customs, visa, licensing and trade control laws is critical to our international business. These laws apply to the products we make, the services we provide and the technical information we transfer. Accordingly, our business partners must obtain all necessary licenses and permits applicable to Frank's imports and exports to ensure every cross-border transaction includes proper import and export classification, valuation, and country of origin information. Business partners must also know where Frank's is authorized to operate.

Trade sanctions and boycotts impose restrictions on who we can do business with; our business partners are restricted from participating in any boycott or trade restriction that would violate U.S. or other applicable law.

- **Records Management and Privacy:** Frank's expects its business partners to honestly, accurately, and timely record and report all business information (including financial records) to ensure that such information is maintained in a manner consistent with applicable laws and regulations and that effective internal controls are in place to protect and comply with these same requirements. In addition, Frank's expects its business partners to protect the confidentiality and privacy of these records and only allow authorized personnel to access and use those records for authorized business purposes. We expect to be advised immediately of any clerical or accounting errors as they become known and when there may have been an inadvertent disclosure of confidential or private information.

Not only does Frank's expect its business partners to adhere to the standards above, we also expect them to ask questions and report concerns regarding possible ethical or legal violations so that we can respond, investigate, and resolve these issues. Our ethics and compliance hotline is a confidential and anonymous reporting system available to all business partners to raise concerns or ask questions, either online via <http://franksinternational.silentwhistle.com> or toll-free at +1 800 923 9553. Frank's promptly investigates all reports of violations and treats these investigations confidentially. General questions can be addressed to compliance@franksintl.com, an email address monitored by the Company's Legal Department. Business partners are also expected to fully cooperate in any investigation initiated by Frank's. Frank's does not tolerate any form of retaliation against an individual or a firm who raises good faith concerns regarding misconduct of its employees or its business partners, and we expect our business partners to follow this same rule.

While no set of guidelines can be all-inclusive, adhering to our Business Partner – Code of Business Conduct and Ethics and the core values at its foundation is critical to the success of our business partnership. Upholding the highest standards of ethical business conduct is a shared responsibility – ours and that of our business partners. It is the responsibility of the business partner to ensure that its representatives understand and comply with this Code. We look forward to doing business with partners who understand this responsibility and join in our commitment to these principles.