

# MAMMOTH ENERGY SERVICES, INC.

## VENDOR CODE OF CONDUCT

### Introduction

Mammoth Energy Services, Inc and its subsidiaries (collectively, the “Company,” “we,” “us,” and “our”) are committed to ethical and lawful behavior, and to acting professionally and fairly in all business dealings and relationships. We recognize that the activities of our vendors may influence our reputation and relationship of trust with our customers and employees and, therefore, we expect our vendors to maintain the highest ethical and legal standards. This Vendor Code of Conduct (“Code”) describes how we expect our vendors to conduct business.

We expect our vendors to: (i) understand the requirements of this Code; (ii) operate in accordance with this Code, including aligning their guidelines, policies and practices with this code and communicating and enforcing the Code provisions throughout their organization and across their supply chain; and (iii) comply with all applicable laws, rules, regulations and standards.

Furthermore, vendors are required to comply with the Company’s Code of Business Conduct and Ethics, a copy of which is made available to all vendors.

### Business Integrity

Vendors should conduct their business interactions and activities with integrity, including in accordance with their obligations under their specific agreement(s) with the Company. In addition to any specific obligations under any agreement with the Company, vendors should, without limitation:

- honestly and accurately record and report all business information and comply with all applicable laws regarding the completion and accuracy of such information;
- create, retain and dispose of business records in compliance with all applicable laws; and
- provide honest and accurate invoices that: (i) itemize the provision of goods and services; (ii) quote the PO number, as applicable; and (iii) provide supporting documentation.

### Antitrust/Fair Business Practices

We require that all our vendors comply with antitrust and other competition laws. Furthermore, we expect vendors to abide by fair business practices, including truthful and accurate advertising.

### Anti-Corruption

The Company has zero-tolerance for bribery and corruption, and we expect our vendors to take the same approach. A vendor may not:

- offer or allow anything of value to be given on behalf of the Company in order to gain an improper advantage;
- offer or allow anything of value to be given to a the Company’s directors or employees in order to gain an improper advantage; or
- ask for or accept anything of value which the vendor believes is being offered in order to obtain an improper advantage.

### Gifts and Entertainment

All purchases made by the Company should be made on the basis of price, quality and service. The Company will deal with its vendors fairly, honestly and openly, and we expect vendors to deal fairly, honestly and openly with the Company. Our employees are required to conduct all business and interactions with vendors in compliance with the applicable provisions of the Company's Code of Business Conduct and Ethics.

Vendors should avoid any actions with the Company employees during any vendor selection or re-selection process that could give others the impression of favoritism or other improper advantage. Furthermore, vendors should not offer, and the Company's directors and employees should not accept, gifts or entertainment that might compromise, or appear to compromise, a director's or employee's judgment.

### **Human Rights**

We support fundamental principles of human rights. Our respect for the protection and preservation of human rights is guided by the principles set forth in the United Nations Universal Declaration of Human Rights. We expect our vendors to have similar policies and practices that apply to all workers, suppliers and their supply chains, including migrant and temporary workers. Furthermore, vendors should comply with all applicable human rights laws, statutes, regulations and codes.

### **Respect, Inclusion and Non-discrimination**

We believe that workers should be treated with respect and dignity at all times. We expect vendors to comply with all applicable laws regarding discrimination in hiring and employment practices (e.g., recruitment, job assessment, promotion, remuneration, training and benefits). We expect vendors to maintain a workplace free of discrimination, harassment, victimization and any other form of inappropriate behavior or abuse on any grounds, including, but not limited to, race, color, gender, gender identity, religion, age, national origin, ethnic or social origin, citizenship status, marital status, parental status, pregnancy, political convictions, religious beliefs, union affiliation, military service, reserve or veteran status, sexual orientation or disability. Vendors are expected to maintain an environment free of harassment, violence and abuse (physical or verbal) at all times.

### **Freedom of Association**

We recognize and respect the rights of our employees to exercise their lawful rights of free association, including joining or electing not to join any association. Similarly, we expect our vendors to recognize and respect the right of their employees to exercise their lawful rights of free association, including joining or electing not to join any association.

### **Safe and Healthy Work Environment**

We expect our vendors to provide a healthy and safe work environment that minimizes health and safety risks, supports accident prevention and ensures the health and safety of all personnel and all others affected by their activities. We expect vendors and their subcontractors to comply with all applicable safety and health laws and regulations. We also expect vendors to protect workers, and any visitors to their facilities, from exposure to chemical, biological and physical hazards. Vendors shall monitor their workplace for any other safety hazards and provide a safe and secure environment for workers and visitors. We expect that vendors will provide information and training regarding any hazardous materials to its workers.

## **Respect for Environment and Conservation**

Vendors are encouraged to conserve natural resources, to reuse and recycle and to avoid use of hazardous materials where possible.

## **Environmental Compliance**

Vendors should comply with applicable environmental regulations, including having, maintaining and operating in compliance with all permits, licenses, registrations and restrictions.

## **Waste Management**

We expect vendors to take steps to minimize or eliminate waste across their operations and those of their suppliers. Furthermore, we expect vendors to have systems to ensure the safe and lawful handling, movement, storage, recycling/reuse or management of waste, air emissions and waste water discharges.

## **Processes, Emergency Preparedness and Response**

Vendors should have appropriate processes in place to identify, prevent and mitigate any risk of a chemical spill or other event that could pose a threat to worker safety and/or to the environment. These processes include emergency plans in the case of an unsafe event and response procedures should such an event occur.

## **Management Oversight**

We encourage our vendors to institute effective management systems that utilize the best available techniques and practices to adhere to this Code and continuously improve their performance. This should include a process for the identification and proactive mitigation of risks associated with compliance to this Code, as well as a process for ongoing monitoring and review of risk controls, and prompt and accurate reporting of all incidents.

## **Confidential Information, Privacy and Data Security**

We expect our vendors to protect confidential information. When applicable, vendors should sign and abide by the terms of any confidentiality disclosure agreement. When a vendor handles personally identifiable information on behalf of the Company, the vendor should commit to apply privacy and information security safeguards. Such vendors should also be subject to an online information security assessment. In addition, vendors are subject to compliance with all applicable privacy/data protection and information security laws and regulations.

## **Mechanism for Reporting Concerns**

We expect our vendors to maintain a process through which their workers can report any concerns in the workplace, including any concerns relating to compliance with this Code. The process should be transparent and understandable to workers and should ensure that workers can utilize the process without threat of reprisal, intimidation or harassment. If concerns are reported, we expect our vendors to investigate and take corrective action as needed.

Vendors can report any suspected compliance or ethics violations related to services being provided to the Company by contacting the Company's Whistleblower hotline at 844-437-8201.

Approved by the Board of Directors on October 27, 2020.