

## **Civeo Conflict Minerals Policy**

### **I. OBJECTIVE**

The purpose of this policy is to make transparent to all stakeholders the commitment to comply with Section 1502 of the Dodd-Frank Act Wall Street Reform and Consumer Protection Act and the resulting due diligence efforts that Civeo Corporation (Civeo) has committed to in order to achieve compliance. The policy also outlines the expectations of our suppliers as a result of our compliance efforts. As a result of this policy, Civeo expects employees to cooperate with all compliance directives related to Conflict Minerals compliance.

### **II. APPLICABILITY**

This policy applies to Civeo and all of its subsidiaries.

### **III. POLICY**

Civeo and its subsidiaries are aware of and concerned by reports that profits from the sale of certain metals mined in the Democratic Republic of the Congo (DRC) and adjoining countries have helped fuel war and human rights violations in eastern Congo. As a result, we are committed to complying with the requirements set forth in the final rule regarding the use of "Conflict Minerals" under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act), and the related rules and regulations issued by the U.S. Securities and Exchange Commission (SEC).

As required by the Dodd-Frank Act, the SEC has adopted rules requiring publicly traded companies to disclose whether they use tin, tantalum, tungsten, and gold (collectively, 3TG) that originated in the DRC or an adjoining country and if so, to issue a report describing their due diligence efforts to determine the country of origin and chain of custody of the metals. DRC conflict free means the product does not contain 3TG that directly or indirectly finances or benefits armed groups in the DRC or an adjoining country.

Civeo, like many companies in our industry, requires some of these 3TG materials in the manufacturing of its products as they are necessary for the functional performance of the products. We do not purchase these metals directly from smelters or mines, so we must rely on the source information provided by our suppliers. We are working closely with our direct suppliers to trace newly mined minerals back to their origin in order to ensure responsible sourcing. As tracing methods evolve, we intend to incorporate appropriate proven methods in our program.

We require suppliers whose products contain 3TG to submit information about the source of these materials using the standardized Global e-Sustainability Initiative and Electronic Industry Citizenship Coalition (GeSI/EICC) Conflict Minerals Reporting Template or an equivalent system that traces the metals back through the supply chain.

In order to support a conflict-free supply chain and comply with the applicable rules and regulations, Civeo commits to:

- Support the objectives of the legislation on Conflict Minerals.
- Perform supply chain due diligence in accordance with the Organization for Economic Co-operation and Development's internationally recognized and established due diligence framework.
- Identify the presence of Conflict Minerals in our supply chain that are necessary to the functionality or production of our products.
- Develop repeatable processes to determine whether Conflict Minerals in our supply chain, if any, originate from the DRC and adjoining countries or are derived from recycled or scrap sources.
- Perform a series of supplier inquiries to trace the source of minerals within our supply chain.
- Educate our suppliers and employees with respect to the SEC reporting requirements related to Conflict Minerals.
- Prepare an appropriate disclosure for Civeo's required SEC filings on the due diligence performed.
- In addition to the foregoing commitments, we expect our suppliers to perform similar due diligence on the sources of Conflict Minerals in their respective supply chains and make their findings available to us.

If Civeo becomes aware of a supplier whose supply chain includes metals that are not DRC conflict free, we will take the appropriate actions to remedy the situation in a timely manner, including reassessment of supplier relationships. We expect our suppliers to take similar measures with their suppliers to ensure alignment throughout the supply chain.

#### **IV. RESPONSIBILITY**

The responsibility for administration of this policy rests with the Sr. Vice President of Human Resources / HSE and may be delegated as appropriate.

## How to Raise a Concern

If you are concerned this policy is not being followed, report the concern to your immediate supervisor and the Civeo Legal Department. For those who wish to remain anonymous, Civeo offers a 24-hour-a-day, 7-day-a-week, multilingual global Ethics Line and online reporting tool. The hotline and online reporting tool are administered by a third-party provider and anyone reporting a concern in good faith is protected from retaliation under Company Policy and in a number of countries by legislation.

Employees and others are encouraged to report potential, suspected or actual violations of this policy by using one of the following methods:

1. Employees may report known or suspected violations using the Ethics Line

Australia	1-800-142-815
Canada	1-855-866-2133
United States	1-855-866-2133

To call from a country not listed please visit <http://www.business.att.com/bt/access.jsp> to find your country access code. Once the access code is found, dial the code and when you hear the English-speaking operator or series of prompt tones, dial the Hotline number 855-866-2133 to connect with the Ethics Line.

2. Employees may communicate their concerns (anonymously or otherwise) directly to the Company by sending an email to [ethics.hotline@civeo.com](mailto:ethics.hotline@civeo.com) or an envelope marked “confidential” to the Company:

Civeo Corporation  
Three Allen Center  
333 Clay Street, Suite 4980  
Houston, Texas 77002  
Attn: Chief Financial Officer or Audit Committee (as appropriate)