ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

Superior
ENERGY SERVICES

ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

INTRODUCTION

At Superior, while ethical behavior requires full compliance with all laws and regulations, we aim to not just "comply" with the letter of the law. We all have a responsibility to go beyond simple compliance by honoring the underlying spirit of the law by basing our decisions on Our Shared Core Values.

This Policy provides guidance on the expected standards of behavior, helps you identify when something is prohibited to avoid situations where bribery and corruption can occur, and provides you with help and guidance if you are unsure about whether there is a problem and you need further advice.

WHO THIS POLICY APPLIES TO

- All officers, directors and employees of Superior Energy Services, Inc. and each of its subsidiaries (collectively, "Superior" or "Company");
- Any firm or third-party agent of the Company (such as agents, brokers, consultants, contractors, distributors or sales representatives); and
- Both the public and private sectors.

WHAT IS BRIBERY?

Bribery – Is the act of offering, giving, receiving, or soliciting something of value to influence the actions of an official or other person in a position of trust. It is a form of corruption that undermines fairness and integrity.

It is illegal in most countries where we operate. It can be prosecuted under both criminal and civil laws, and the penalties for bribery can be severe, including

OUR SHARED CORE VALUES

Integrity - We conduct ourselves and our business affairs with honesty and integrity, and do not tolerate illegal or fraudulent activities.

Respect - We treat our employees with fairness, dignity and respect and do not tolerate any forms of discrimination.

Safety - We protect the safety and health of ourselves, our fellow employees and everyone that we work with and stop unsafe actions.

Fairplay - We deal fairly with customers, suppliers and other business relationships and always act in the best interests of the Company.

Citizenship - We conduct ourselves as good citizens in the communities where we operate, and we respect the environment.

imprisonment and fines. Anti-corruption laws severely regulate, prohibit and punish acts of bribery in the public, and private sectors, and as a global company, we need to follow these laws wherever and whenever we operate.

HOW BRIBERY CAN AFFECT SUPERIOR

Any violation of the Anti-Corruption Laws would be extremely damaging to our business and reputation and could carry significant consequences for the Company, including financial penalties, loss of business and even criminal sanctions.

Anyone that is caught violating Anti-Corruption Laws may face personal fines and imprisonment, this could affect our directors, officers, employees and vendors, and as a result, we all have a responsibility to conduct our business in full compliance with the Anti-Corruption Laws everywhere we do business.

Designated Compliance Personnel – If you have any questions about this Policy, the Senior Ethics and Compliance Counsel or the Senior VP-General Counsel and Corporate Secretary are available to provide guidance and support.

Anti-corruption and Anti-Bribery Laws

Anti-corruption and bribery laws apply in every country where we do business (collectively, the "Anti-Corruption Laws"). These laws typically prohibit companies and their officers, directors, employees, shareholders and third-party agents from:

- Giving, paying, promising, offering or authorizing the payment of **"anything of value"** to a **"government official"** for the purpose of persuading that official to help obtain any business advantage; or
- Giving, paying, promising, offering, or authorizing the payment of **"anything of value"** to any **business or individual** as an incentive to perform a business or public function improperly.

Under most anti-corruption laws, "anything of value" is interpreted very broadly. It goes far beyond just cash and can include virtually anything that could be seen as having value to the recipient (e.g. Money, gifts, favors, services, travel and entertainment, employment opportunities, loans, donations, political contributions, etc.).

The definition of "government official" under anti-corruption laws is broad and can vary slightly depending on the specific laws. In general, it includes anyone who holds a position in a government or public institution, in a public international organization, in a state owned enterprise (such as PEMEX, Petrobras, Saudi Aramco, Petronas, etc.) is a political candidate, or a political party official, regardless of their specific title or level of seniority (e.g. employees at a government agency, or instrumentality, the United Nations, the World Banks, etc.).

As a global business, we are required to comply with key anti-corruption laws, including the United States' Foreign Corrupt Practices Act and the United Kingdom's Bribery Act (2010). We also must adhere to comparable laws in every country in which we operate, such as Australia, Mexico, Argentina, Brazil, Kuwait, and Indonesia.

WHAT COULD BE CONSIDERED A BRIBE

In most situations, common sense will alert you to a bribe being offered or requested. However, if you are in doubt, here are some questions you should ask yourself:

- Am I being asked to pay for something above market price without proper explanation? (e.g. overpriced items, excessive commissions, etc.)
- Am I being asked to provide any other benefit without any proper explanation (e.g. a lavish gift, a kickback or an unusual contribution to a charity or political organization?)
- Am I being asked to make a payment for services to someone other than the service provider?
- Are the hospitality or gifts I am giving or receiving excessive in price or appearance?
- When a payment or other benefit is being offered or received, do I know or suspect it is to induce or reward favorable treatment, to undermine an impartial decision -making process or to persuade someone to do

Anti-Corruption Laws typically prohibit acts of bribery even if:

- The benefit is for someone other than the party offering payment;
- The business sought is not with the government;
- No business is awarded;
- The intended recipient initially suggested the payment. ; or
- In some countries payment is prohibited even if no benefit is sought.

POLICIES AND PROCEDURES

General Prohibition

Our commitment to ethics and integrity through Our Shared Core Values, goes beyond most legal requirements and prohibits improper payments in all of our activities, both with governmental entities and in the private sector.

To be clear, we do not offer or pay bribes, kickbacks or facilitation payments in any amount, at any time, or for any reason.

"Facilitation Payments" are payments made to government officials to speed up routine processes or actions. These actions are typically non-discretionary, meaning the official is already obligated to perform them. They are also known as "grease payments" or "expediting payments." (e.g. payments to connect electricity, or internet, or to complete import processes once all requisites are met, etc.)

In some countries facilitation payments are strictly prohibited. But beyond its legality, facilitation payments raise ethical concerns as they can contribute to a culture of corruption and undermine fair treatment.

Compliance with the Anti-Corruption Laws and our Policy can at times be difficult to interpret and must be undertaken on a case-by-case basis. While it is difficult to address every scenario in this Policy, we have provided examples of some of the most common areas of non-compliance below.

A Thought on Transactions with Government Entities

Our Policy does not prohibit legitimate business transactions with government entities, indeed many of our customers are national oil companies, but certain of those transactions carry special risks, and must be reviewed in advance to determine what additional safeguards may be necessary to protect the Company. For that reason, it is essential that all our personnel can identify when we are dealing with a government entity. Below are just a few obvious, and not so obvious, examples.

EXAMPLES OF GOVERNMENT ENTITIES IN OUR BUSINESS

Obvious: vs.

- National, state, provincial, territorial, or local entities
- Government departments and agencies, including customs, tax, immigration, environmental, natural resources, etc.
- Embassies and Consular Representations
- Army, Air Force and Navy organizations
- Legislative bodies and Courts

Not so obvious:

- Private Companies or people "acting in an official capacity" with respect to a particular matter or "exercising a public function"
- Government-owned or controlled corporations, including oil companies. Like NNPC, Petrobras, Petronas, Pemex, PDVSA, Saudi Aramco and Sonangol

Gifts and Entertainment

Often, providing or receiving small gifts and entertainment is important when maintaining and developing business relationships. However, while they may be legal, permissible or customary in some countries, if done improperly they can raise serious issues or violate other laws. Here are some guidelines for gifts and entertainment:

- Should be appropriate and customary and must always comply with applicable laws.
- Should be allowed under local law (keep in mind that in many jurisdictions where we operate even gifts of nominal value are not permitted).
- Should be allowed by contract
- Payment of lavish or excessive gifts and entertainment expenses is always prohibited.
- Gifts in cash or cash equivalents (e.g. a gift card) are always prohibited
- Will the gift pass the “newspaper” test?
- Any gifts or entertainment contemplated must follow the approval matrix below.
- Be mindful of the frequency of Gifts and Entertainment, providing G&E more than twice a year to the same person should not be considered.

Note: All Gifts & Entertainment involving the company’s executives (e.g. CEO, COO, CFO, CIO, etc.) in excess of amounts previously approved by the Audit Committee of the Board of Directors shall be approved by the Senior VP-General Counsel and Corporate Secretary. Please consult with the Senior VP-General Counsel and Corporate Secretary as to the Audit Committee approval thresholds for company’s executives.

GIFTS AND ENTERTAINMENT (“G&E”) APPROVAL MATRIX

<table>
<tr><th>GIFT THRESHOLD</th><th>LINE MANAGER</th><th>BUSINESS UNIT LEADER</th><th>DIVISION PRESIDENT</th><th>ETHICS & COMPLIANCE</th><th>GENERAL COUNSEL</th></tr>
<tr><td colspan="5">G&E FOR GOVERNMENTAL OFFICIALS</td><td rowspan="9">INFORM ALL G&E MORE THAN US $1,000</td></tr>
<tr><td>UNDER $100</td><td>APPROVAL</td><td colspan="3">INFORM</td></tr>
<tr><td>ABOVE $100</td><td colspan="4">APPROVAL</td></tr>
<tr><td colspan="5">G&E FOR NON-GOVERNMENT OFFICIALS</td></tr>
<tr><td>UNDER $250</td><td>APPROVAL</td><td colspan="3">INFORM</td></tr>
<tr><td>ABOVE $250</td><td colspan="4">APPROVAL</td></tr>
<tr><td colspan="5">IF YOU RECEIVE A G&E</td></tr>
<tr><td>ABOVE $250</td><td colspan="2">APPROVAL</td><td>INFORM</td><td>APPROVAL</td></tr>
</table>

Travel and Travel-related Expenses

If you are asked to support or provide travel for Government Officials or customers, such support may be appropriate in certain circumstances. However, all such activities must be fully disclosed, carefully vetted, properly approved, and consistently monitored.

Site visits, offsite meetings and other transactions that involve the payment or reimbursement by the Company of travel and travel-related expenses (e.g., transportation, lodging, meals and incidental expenses) of individual Government Officials or customers must be approved in advance. The following information needs to be provided for approval:

- The business purpose involved;
- The need for payment of expenses by Superior;
- Whether the expenses are directly related to the business purpose
- Whether the expenses are reasonable in amount; and
- Whether per diems are requested and the justification for it.

It is preferable to make billing arrangements for such expenses directly with the suppliers of services rather than advance funds to or reimburse a Government Official or customer.

Per diems in cash, or cash equivalent, should be avoided as much as possible due to the lack of traceability. It will always be preferred to reimburse travel expenses provided appropriate receipts are submitted for review and approval.

All travel related expenses to Government officials or customers must be approved by the Business Unit Leader, Ethics & Compliance and the Division President.

Payment of travel-related expenses not related to a business purpose, including side trips primarily for pleasure and travel of spouses or other family members or companions, is prohibited.

Gifts, Entertainment and Travel Pre-Approval Form

Before providing any form of gift, entertainment or travel in accordance with this policy, you must complete the approval form available in the Ethics and Compliance section of the Superior Intranet.

IF YOU ARE EVER OFFERED OR ASKED FOR A BRIBE

Our initial reaction to requests for improper payments is critically important and must demonstrate our unequivocal commit¬ment to the Anti-Corruption Laws and Our Shared Core Values. If you hear rumors of actions contrary to this Policy, report them immediately to Ethics & Compliance. If you receive a request for an improper payment, you must:

- Refuse to make the payment and explain that Superior does not make such payments;
- Instruct any involved third-party agents that they are not authorized to make the payment on Superior’s behalf, and explain that Superior will immediately terminate its business relationship with them if the payment is made; and
- Make it clear that your refusals are absolute and do not come with a “wink and a nod.”

Consult immediately with the Ethics and Compliance regarding next steps.

POLITICAL PARTY, PARTY OFFICIAL, AND CANDIDATE CONTRIBUTIONS

Political contributions on behalf of Superior, whether cash or in-kind, to political parties must follow the same approval process as to gifts and entertainment to Government Officials. In-kind contributions may include loaning of Company property, use of Company facilities, or participation in campaign activities during paid business hours.

Contributions to individual candidates for political office, political party officials, or committees or organizations for the election of a particular candidate to any political office are prohibited, except as approved by the Business Unit Leader, the Division President, and Ethics & Compliance using the same approval process as to gifts and entertainment to Government Officials.

SPONSORSHIPS, DONATIONS AND CHARITABLE CONTRIBUTIONS

Occasionally, requests for social and charitable contributions can raise anti-corruption compliance issues because they may act as conduits for improper payments to Government Officials or political parties. If you are asked for a charitable contribution on behalf of the Company, prior to making the donation or contribution, you must complete the Sponsorships, Donations & Charitable Contributions Approval Form and obtain approval from the Business Unit Leader, Ethics & Compliance, Marketing & Communications and the Division President.

RELATIVES OR BUSINESS ASSOCIATES OF GOVERNMENT OFFICIALS

Although close relatives or business associates of Government Officials are not themselves Government Officials, relationships with them carry special risks. In general these relationships must be carefully considered.

If you are pursuing these types of business relationships on the Company's behalf, you are responsible for diligently gathering and documenting the relevant facts to determine whether a proposed transaction involves or will benefit a Government Official or an entity owned or controlled by a Government Official (e.g., as a shareholder or owner of a contractor). Any questions about the status of an individual must be raised in advance with Ethics & Compliance.

Keep in mind that any business relationships with close relatives or business associates of Government Officials (whether a vendor or a customer) must be vetted and approved via de Vendor or Customer approval portals.

THIRD-PARTY AGENTS

Superior can be held liable for payments made by third-party agents who may have dealings with Government Officials. We have developed guidance and procedures to screen and monitor third-party agents and protect the Company from potential liability.

It is essential that we closely monitor third-party agents acting on our behalf to ensure we understand who our business partners are and how they conduct activities for the Company. These agents must operate in strict compliance with our standards and maintain accurate records of all transactions.

We must conduct appropriate, risk-based due diligence on our third-party agents before engaging them and then be on the lookout for other "red flags" after they have been engaged to act on our behalf.

Business relationships with third party agents must be vetted and registered on our Vendor approval portal, and they must complete and submit on the portal the Due Diligence Questionnaire available on the Ethics & Compliance page of the Superior Intranet.

Keep in mind that for the approval of Agents, Ethics & Compliance will conduct a risk-based review and could consider enhance the due diligence of the prospective agents by ordering separate third-party reports. These reports usually take between 15-20 business days to be completed from the moment they are requested and have a cost associated with them. It is expected that the costs of these reports be paid for by the Business Line requesting the agent.

Questions to Ask Yourself to Highlight "Red Flags" on third Parties and Agents:

- Who are they – have I seen documents evidencing that they are who they say they are?
- Who else have they worked with – do they have references?
- Is their only qualification their influence/ connection to Government Officials?
- Are they qualified to render the services requested?
- Were they recommended by a Government Official?
- Are they well established with a good reputation or are they more obscure so that I need to do more to find out about them?
- Do they operate in a territory where bribery is prevalent?
- Are they happy to sign a contract agreeing to comply with anti-bribery procedures?
- Do they have their own anti-bribery program?
- Have I done basic searches such a Google searches, business directory searches, etc.?
- Are there inconsistencies between the provider of the services and the person I am paying?
- Are commissions/payments in line with generally accepted market practice?

ACCURATE BOOKS AND RECORDS

Violations of Anti-Corruption Laws may occur if we (i) fail to follow our guidelines for approving payments in compliance with this Policy and our internal controls, and (ii) fail to keep accurate books and records of all payments to Government Officials. To ensure that we comply, you must:

- Accurately record all transactions, even when the underlying transaction might violate U.S. or foreign laws or regulations;
- Never agree to requests for false invoices or for payment of expenses that are unusual, excessive, inadequately described, or otherwise raise questions under this Policy; and
- Never make any payments to anonymous (i.e.,"numbered") accounts that are in the name of neither the payee nor an entity known to be controlled by the payee.

ASKING QUESTIONS AND REPORTING POSSIBLE VIOLATIONS

We are all responsible for ensuring compliance with Anti-Corruption Laws and Our Shared Core Values. If you see or suspect any illegal or unethical behavior, or you have a question about what to do, speak up and ask for help. Sometimes, you may not be able to talk about an issue with your supervisor or manager. If that's the case, you have several options:

- Talk with any other member of management.
- Contact your designated human resources personnel when you have confidentiality concerns or you believe management cannot assist you.
- Use the following resources at any time: Contact Ethics & Compliance Department
  - Email: compliance@superiorenergy.com
  - Phone: 713-654-2228
- Call the Superior Hotline
  - Call the toll-free hotline, available in most languages, 24 hours a day, 7 days a week.
    - Domestic U.S. Calls: 800-639-9198
    - International (non-U.S.) Calls: +1-855-283-9905, (country-specific access codes are listed here: Superior Energy Hotline - Powered by Convercent)
  - Mail a report to the General Counsel at: 1001 Louisiana St., Suite 2900 Houston, TX 77002, USA

All questions or concerns will be handled as confidentially as appropriate and will be investigated fully, with no retaliation against anyone who raises a concern.

FAILURE TO COMPLY

Any failure to comply with any relevant Anti-Corruption Laws or this Policy will not be tolerated. Any Superior officer, director, employee or agent who violates this Policy will be subject to discipline, which may include termination of their employment.

Superior
ENERGY SERVICES

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