



COMMITTED TO THE CORE

OUR SHARED CORE VALUES AT WORK

 **Superior**
ENERGY SERVICES

AT OUR CORE

At Superior, our Shared Core Values serve as the principles that guide our daily operations and embody our dedication to responsible business practices. They set the standard for how we conduct business. It is what we expect of ourselves.

It is who we are.

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, everyone we work with, and we 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.

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INTEGRITY TO THE CORE

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





APPLYING OUR SHARED CORE VALUES

At Superior, ethical behavior is inseparable from integrity and good judgment. Ethical behavior requires full compliance with all laws and regulations, and at Superior, compliance with the law is the minimum standard. We have a responsibility to honor not just the letter of the law, but the spirit underlying the law. So we base our decisions on both legal and regulatory rules, and our Shared Core Values.

Currently operating in many countries, we are continually increasing our global presence. There will be times when local laws and customs may conflict with our Core Values. Whenever such conflicts arise, we apply the strictest standard. We do not follow customs that violate our Core Values.

ETHICS, OUR VALUES AND THE LAW

Use this digital brochure as a resource for information about our policies and standards, or whenever faced with a difficult business decision. It is intended to help us apply our Shared Core Values to specific work-related situations that may arise.

As always, we encourage you to use good judgment. If there's ever a question, do not hesitate to ask.

WHO MUST FOLLOW OUR SHARED CORE VALUES

Our Shared Core Values apply to everyone. This includes all directors, officers and employees of Superior Energy Services, Inc. and of each of its subsidiaries.

Third-party business partners—suppliers, temporary employees and anyone performing services or acting on our behalf—serve as an extension of Superior. Consequently, they are expected to follow the spirit of our Shared Core Values, along with any applicable contractual provisions, when working in this capacity.

Managers who supervise our third-party business partners are responsible for ensuring that they understand our Shared Core Values. If a third-party business partner fails to comply with our ethics and compliance expectations, their contract may be terminated.



REPORTING POTENTIAL VIOLATIONS

If you see or suspect any illegal or unethical behavior, or if you have a question about what to do, don't hesitate to ask for help.



If for some reason you're not able to talk about an issue with your supervisor or manager, you have several options:

FIRST: You may talk with any other member of management.

SECOND: You may also contact Human Resources if you have confidentiality concerns or believe management cannot assist you.

THIRD: At any time you can also use the following resources:

- Email to compliance@Superiorenergy.com
- The toll-free Hotline available 24/7, in several languages
- U.S Calls: 833-293-3439
- For all other calls, see the country-specific numbers listed on [page 34](#).
- Mail a report to the Compliance Department at:
1001 Louisiana St., Suite 2900,
Houston, TX 77002

CALLING THE SUPERIOR HOTLINE

Available 24 hours a day, 7 days a week, the Superior Hotline is operated by trained third-party specialists who will answer your call, document your concerns and forward a written report to the Ethics and Compliance Department for further investigation.

Where allowed by law, callers may choose to remain anonymous. If you do so, we will make every reasonable effort to keep your identity confidential. Whether anonymous or not, all submitted reports will be treated equally.

After you make a report, you will receive an identification number allowing you to follow up on its progress. This is important, particularly with anonymous submissions, as effective investigation may require additional information. This ID number will also enable you to track the resolution of the case. Out of respect for privacy, however, Superior cannot share information on individual disciplinary actions.



FIXING IT MEANS REPORTING IT

Every question asked and every concern raised is an opportunity for improvement. When we speak up, take action and report questionable conduct, we are protecting our coworkers and our Company's reputation.

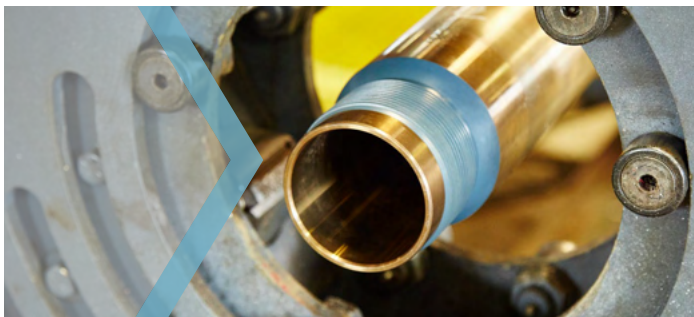


OUR NON-RETALIATION POLICY

Each of us is responsible for safeguarding the integrity of Superior. We want employees to report possible problems in confidence and without fear of retaliation.

To that end, Superior will not tolerate any retaliation against an employee who in good faith asks questions, reports actions inconsistent with our Shared Core Values or policies, or assists in an investigation of suspected wrongdoing.

Reporting “in good faith” means making a genuine attempt to provide honest, complete, and accurate information, even if it later proves to be unsubstantiated or mistaken.



EMPLOYEE RESPONSIBILITIES

Each of us must always act with integrity, even when it means making difficult choices. Meeting our responsibilities is how we succeed and grow.

- Act in a professional, safe and ethical manner consistent with our Shared Core Values.
- Be familiar with the information in this digital brochure, as well as applicable laws and Company policies. Pay particular attention to the policies that relate to your job responsibilities.
- Promptly report concerns about actions that may be contrary with laws, regulations, our Shared Core Values or policies.
- Cooperate fully when responding to an investigation or audit.

ADDITIONAL RESPONSIBILITIES FOR SUPERVISORS

Leaders at Superior have additional responsibilities for maintaining our high standards of ethics and compliance.

- Be a role model for leadership, supporting coworkers when they ask questions and raise concerns:
 - Create an environment where individuals feel comfortable speaking up.
 - Listen and respond to concerns when they are raised.
 - Make sure that no one who speaks up suffers retaliation.
 - Seek help and guidance whenever needed.
- Help others understand the requirements of our Shared Core Values, policies and applicable laws.
- Do not apply inappropriate pressure on others or lead others to think that “bending the rules” or “cutting corners” is acceptable.
- Be a resource for others. Be proactive. Look for opportunities to discuss our Shared Core Values and how they apply to business decisions.

Remember, being busy or pressured by business conditions is never an excuse for operating outside of the law or in a way that is inconsistent with our Shared Core Values.





ACCOUNTABILITY AND DISCIPLINE

We consider adherence to our Shared Core Values to be critically important. Those who act contrary to our policies or the law will be subject to discipline, which may include termination, along with legal proceedings and penalties.

Others indirectly involved may also be subject to discipline. This includes those who fail to use reasonable care to detect or report a violation, those who refuse to divulge information relevant to an investigation, as well as supervisors who approve, condone, “look the other way” or attempt to retaliate.

GUIDELINES FOR DECISION MAKING

Making the right decision is not always easy. You may be under pressure or unsure of what to do. Just remember, you’re not alone. Your coworkers and management are here to help. Keep other resources, such as this brochure and the Superior Hotline, close at hand.

ASK THE FOUR CORE QUESTIONS:

- Is it legal?
- Is it consistent with our policies?
- Does it meet the high expectations reflected in our Shared Core Values?
- Would I still be comfortable with the decision if it appeared in the newspaper



DIGNITY & RESPECT TO THE CORE

Respect: We treat each other with
Fairness, Dignity and Respect.





STRENGTH IN DIVERSITY

That means supporting and encouraging respectful interaction between employees, customers, and vendors. These interactions should be free from discrimination, ensuring a welcoming and inclusive environment that embraces diversity in age, ethnicity, religion, gender, and abilities.

To this end, we support laws prohibiting discrimination based on race, color, religion, national origin, gender, pregnancy, sexual orientation, age, disability, veteran status and all other characteristics protected by law.

FAIR TREATMENT AND EQUAL OPPORTUNITY

Superior brings together employees with a wide variety of backgrounds, skills, and cultures. This wealth of talent and resources creates the diverse and dynamic teams that consistently drive our success.

Each of us is entitled to respect and should be assessed by our qualifications, demonstrated skills, and achievements.

Accordingly, we support laws prohibiting discrimination based on race, color, religion, national origin, gender, pregnancy, sexual orientation, age, disability, veteran status and all other legally protected characteristics.



Make Sure You:

- Treat others respectfully and professionally.
- Do not discriminate against others based on any characteristic protected by law or Company policy.

Watch Out For:

- Excessive profanity, referring to employees using derogatory nicknames, or remarks and verbal abuse.
- Comments, jokes, or materials, including emails that others might consider offensive.
- Inappropriate bias based on characteristics



EMBRACE DIVERSITY AND INCLUSION

At Superior, we value each employee's unique contribution. Collaboration and inclusivity are central to how we work, so we believe the best solutions include a diversity of ideas and perspectives. This approach is critical to our success.

- Promote diversity in hiring & employment decisions.
- Create an environment where employees may fully contribute, develop, and apply their talents.
- Keep an open mind to new ideas and different points of view.

MAINTAIN A HARASSMENT-FREE WORKPLACE

We all have the right to work in an environment free from intimidation, harassment, and abuse. Superior will not tolerate verbal or physical conduct by any employee that harasses another, disrupts another's work performance, or creates an intimidating, offensive, abusive, or hostile work environment.

Unacceptable conduct includes:

- Bullying, yelling, excessive use of profanity, intimidation, threats of violence, and all forms of discrimination.
- Acting aggressively in a manner that causes someone else to fear injury to themselves or their property.
- Threatening remarks, obscene phone calls, stalking or any other form of harassment.
- Causing or threatening physical injury to another.
- Intentionally damaging someone else's property.

Sexual harassment is another form of harassment.

It includes:

- Actions of a sexual nature (i.e., a request for a date or sexual favor) that are unwelcome, made as a condition of employment, or used as the basis for employment decisions.
- An intimidating, offensive, or hostile work environment created by unwelcome sexual advances, insulting jokes, or other offensive verbal or physical behavior of a sexual nature.



Make Sure You:

- Speak out when a coworker's conduct makes you or others uncomfortable.
- Never tolerate intimidation or harassment of any kind.
- Do not use Superior's information systems to visit inappropriate websites.
- Report all incidents of intimidation and harassment that may compromise our ability to work together.

Watch Out For:

- Verbal abuse, bullying, threats, or taunting.
- Unwelcome physical contact, remarks, or gestures.
- The display of sexually explicit or offensive pictures or other materials that demean others.
- Offensive jokes or comments.



PROTECT EMPLOYEE PRIVACY

In recent years the public has grown increasingly concerned about the privacy and security of personal information. As a result, laws protecting personal information and how it may be collected, shared, and used are becoming more common. While protecting this information may now be a legal requirement, Superior has always made it a top priority.



Make Sure You:

- Appropriately safeguard information that is given greater legal protection, including personally identifiable information, government-issued ID numbers, and home addresses.
- Protect the confidentiality of the information of current and former coworkers, as well as job applicants.
- Do not access, discuss, or share confidential information within or outside the Company unless (1) you are authorized to do so because of your job, (2) there is a legitimate business need, and (3) it does not violate the law.
- Consult the Legal Department if law enforcement or regulatory authorities request information. Consult HR regarding all other requests for employee information from any person outside the Company.

Watch Out For:

The loss of control over confidential information, for example, when faxing or emailing personal employee information.



An offshore oil rig is silhouetted against a vibrant sunset sky, with its lights reflecting on the calm water below. A large, light blue diagonal graphic element cuts across the image from the top left towards the center.

SAFETY TO THE CORE

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



LOOKING OUT FOR EACH OTHER

Superior is committed to providing a safe and healthy work environment for employees and others who visit or work at our facilities. This commitment to health and safety is everyone's job. More than a priority, it is a deeply held practice in our Shared Core Values.

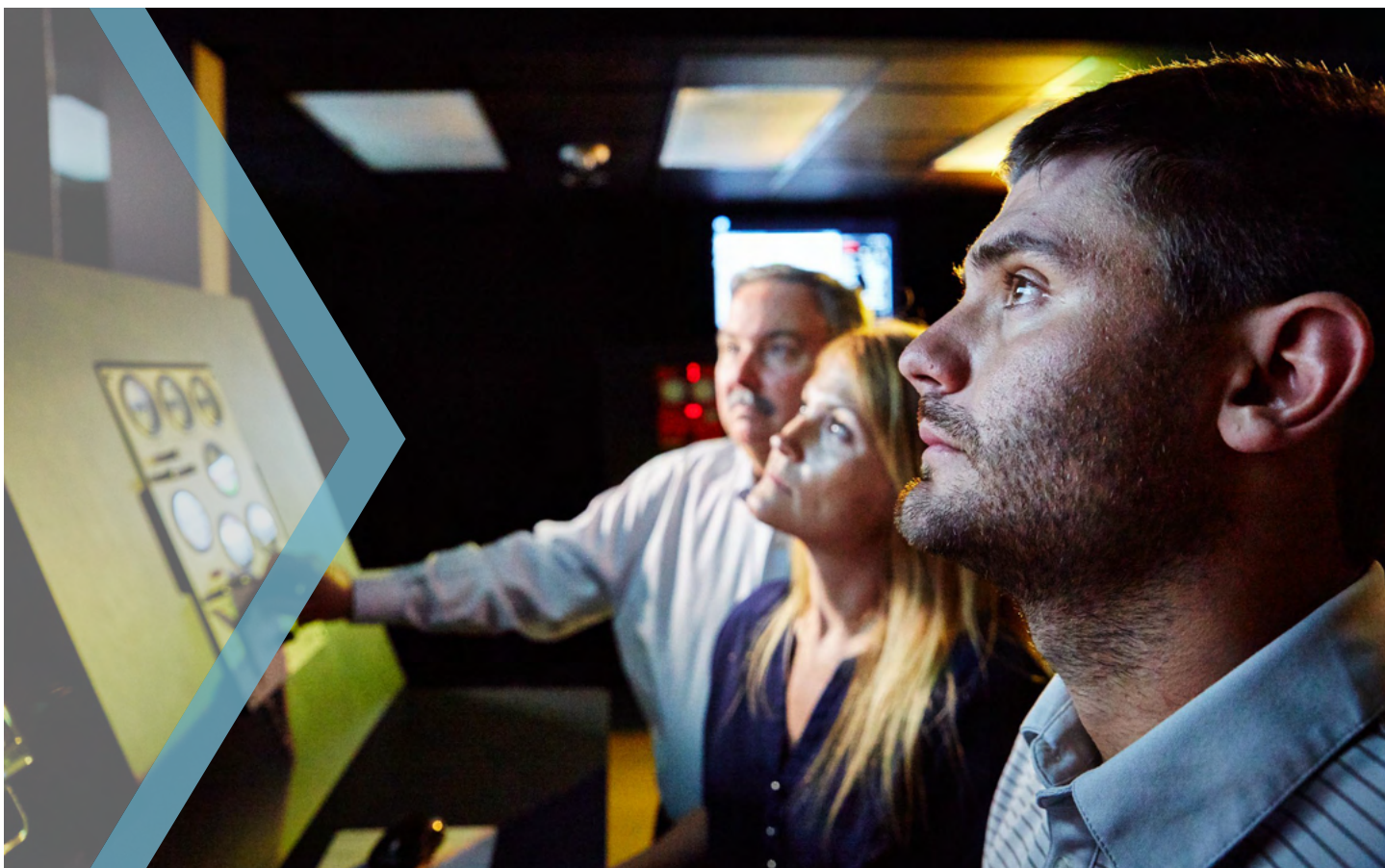
As a Company and individually, we must always demonstrate visible leadership, care and concern for one another's health and safety. With our integrated HSEQ Management System, we show our dedication to achieving and maintaining our HSEQ performance standards.

Safety is the personal responsibility of each employee and manager. All personnel have "stop work authority" and must use it whenever people or the environment could be at risk.

RESPONSIBILITIES FOR ENSURING A SAFE AND HEALTHY WORKPLACE

- Understand our responsibilities to maintain our standards of health and safety.
- Always wear required safety equipment and never tamper with safety equipment or systems.
- Only undertake work that you are qualified to perform.
- Stop work if you consider it unsafe.
- Be sure that your performance is not impaired by, for example, a lack of sleep, alcohol, or any drugs—including prescription or over-the-counter medication.
- Report any accident, injury, illness, or unsafe condition immediately. Never assume that someone else has reported a risk or concern.
- Know the emergency procedures that apply where you work.
- Report all concerns regarding a safe and healthy work environment immediately to management and to your HSEQ Department.
- Do your part to develop and sustain a culture that supports our commitment to health and safety.
- Be proactive and speak up if you hear of or see something that you suspect might put you or others at risk.





ADDITIONAL LEADERSHIP RESPONSIBILITIES

- Be visible in the workplace and lead by example in demonstrating appropriate HSEQ behaviors.
- Ensure adequate resources are available and HSEQ roles and responsibilities are documented and communicated to employees.
- Communicate effectively to ensure HSEQ issues are captured and conveyed.
- Ensure that HSEQ expectations are integrated into operations.
- Make sure all documentation is completed and maintained appropriately.
- Monitor and measure HSEQ goals and objectives.
- Promote HSEQ lessons learned and communicate best practices.
- Encourage the appropriate reporting and investigation of all incidents, including near misses and unsafe acts.

PREVENTING WORKPLACE VIOLENCE

Violence of any kind has no place at Superior.

We will not tolerate:

- Intimidating, threatening or hostile behavior.
- Causing physical injury to another.
- Vandalism, arson, sabotage, or other criminal activities.
- The unlawful possession of weapons on Company property.

ALCOHOL AND DRUG USE

- Never be impaired while at work or on Company business. Always be ready to carry out your duties.
- While conducting Superior business, do not use, possess, or be under the influence of illegal drugs or any substance that could interfere with a safe and effective work environment or harm the Company's reputation.



FAIRNESS TO THE CORE

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





FAIR DEALING IN EVERY TRANSACTION

At Superior, we strive to be fair and honest with everyone—customers, suppliers, business partners and others—to understand and meet their needs, while remaining true to our Shared Core Values.

As a representative of Superior, always tell the truth about our services and capabilities. Never make promises we can't keep. Do not take unfair advantage through manipulation, concealment, abuse of privileged or confidential information, misrepresentation, fraudulent behavior, or any other unfair practice.

In short, treat others as we would like to be treated.



Make Sure You:

- Treat others fairly and honestly.
- Are responsive to all reasonable requests from our customers, suppliers, and business partners, but never follow a request to do something that you regard as unlawful, unsafe, or contrary to our Shared Core Values.
- Promise what you can deliver and deliver what you promise.

Watch Out For:

- Pressure from others to cut corners.
- Temptations to tell people what you think they want to hear rather than the truth.

SUPPLIER RELATIONS

Our suppliers and business partners are essential to our ability to conduct business and meet our standards and expectations. This is why we choose them carefully and objectively. Be sure to:

- Help them understand our expectations and act in a way that is consistent with our standards and applicable policies.
- Report any suspicions that a supplier or a business partner may not be meeting our standards or their contractual obligations.





WORKING WITH GOVERNMENT

Directly and through its subcontractors, Superior conducts business with governments and government-owned entities. Our policy is to comply fully with all applicable laws and regulations regarding government contracting and transactions.

AVOIDING CONFLICTS OF INTEREST

A conflict of interest occurs when there is an issue that potentially interferes with our ability to make an objective business decision. Each of us is expected to use good judgment and avoid situations that can lead to even the appearance of a conflict. This can undermine the trust others place in us and damage our reputation.

Conflicts of interest are not always clear-cut. Any employee with a question should consult with their manager or supervisor or, if circumstances warrant, Superior's Vice President of Ethics and Compliance. This will allow the Company to properly evaluate, monitor, and manage the situation.



EXAMPLES OF COMMON CONFLICTS OF INTEREST

Close Personal Relationships

Business situations involving close friends may create a conflict of interest if the relationship interferes with the employee's ability to put the Company's interest first. Any potential conflicts should be identified and immediately reported to your manager, supervisor, or the Ethics and Compliance Department to make sure there is no conflict.

Corporate Opportunities

If we learn about a business opportunity because of our position at work, it belongs to Superior first. Superior employees may not take for themselves, or direct to any immediate family member or friend, opportunities that are discovered on the job.

Outside Employment

Superior does not prohibit employees from engaging in certain types of outside employment—such as part-time work. However, employees must always disclose and discuss outside employment with their manager or supervisor. Outside work must never interfere with or detract from Superior job duties. Also, outside work must never compete with or conduct business with Superior, its customers, or vendors.

Personal Investments

Your personal investments must not be big enough for someone to reasonably think that you could influence the entity's decisions or compromise your independent judgment. Furthermore, any investment by an employee or an immediate family member in one of Superior's customers, suppliers or vendors is a related-party Transaction and prohibited without prior approval as described below unless the investment is 1% or less of the securities of a publicly traded company, and there is no possibility for a conflict.

Make Sure You:

- Avoid conflict of interest situations.
- Always make business decisions in the best interest of Superior.
- Disclose any relationship, outside activity, or financial interest that may present a possible conflict of interest or the appearance of a conflict of interest. Make your disclosures in writing to your manager or supervisor.



KEY DEFINITION

Immediate Family – Any relation of the employee, including current or previous spouse, child, grandchild, parent, grandparent, sibling, aunt/uncle, cousin, or child of a sibling, regardless of whether the relationship is natural, step or in-law or anyone in a close personal relationship.



RELATED-PARTY TRANSACTIONS

Conflicts of interest, such as those described above, can result in related-party transactions. These are any business transactions or business relationship in which an employee or an immediate family member has a financial interest. This includes the sale, purchase, or lease of goods, material, services or property.

Related-party transactions are prohibited without prior approval from the Chief Executive Officer.

GIFTS AND ENTERTAINMENT

In the right circumstances, a modest gift may be a thoughtful “thank you,” or a meal may be an appropriate setting for a business discussion that strengthens a professional relationship. However, if not handled carefully, the exchange of gifts and entertainment can look like a conflict of interest, especially if it happens frequently or if the value is large enough that someone could reasonably think it is influencing a business decision.

When it comes to gifts and entertainment, our position is clear. Gifts that are reasonable and customary are acceptable, but we do not give or offer any gift or entertainment that is intended to gain an improper advantage in selling services, conducting transactions, or representing Superior’s interests.

THINK BEFORE YOU GIVE OR RECEIVE

Gifts and entertainment come in many forms: fruit baskets, dinners, tickets to sporting events, to name just a few. Before accepting or offering gifts or entertainment, consider the situation. Does the action legitimately support Superior’s interest? Is the amount reasonable and customary? Does it conform to our policies and guidelines? If it is a gift or entertainment that we are providing, does it meet the recipient’s organization standards as well as ours? Would it embarrass you or the Company if it was on the front page of the newspaper? Did you discuss it with your manager or supervisor?

Make Sure You:

- Only offer and accept gifts and entertainment that are reasonable and customary for the business relationships.
- Do not request or solicit personal gifts, favors, entertainment, or services.
- Never accept gifts of cash or cash equivalents (i.e., gift cards).
- Understand and comply with the policies of the recipient’s organization before offering or providing gifts or entertainment.

Watch Out For:

- Excessive hospitality, loans (excluding loans from financial institutions at prevailing market rates), or other special treatment from any customer, supplier, or competitor.
- Situations that could embarrass you or the Company.
- Business partners that appear to be privately held but are actually considered governmental entities (note: in such cases additional rules may apply).
- Third parties or agents who are considered valuable primarily for their personal ties rather than for the services they perform or who request compensation disproportionate to their services.

If you are uncertain whether a gift you have been offered or intend to give is appropriate, contact the Ethics and Compliance Department for assistance.

Note: nothing in our Shared Core Values is intended to prohibit employees from spending reasonable amounts for meals and other entertainment of customers and suppliers, which is customary in Superior’s lines of business.



MAINTAINING ACCURATE BUSINESS RECORDS

Business partners, government officials, and the public rely on the accuracy and completeness of our disclosures and business records. Accurate information is also essential within the Company so that we can make good decisions.

Our books and records must accurately reflect our transactions in reasonable detail, in accordance with our accounting practices and policies.

Some employees have special responsibilities in this area, but all of us contribute to the process of recording business results and maintaining records.

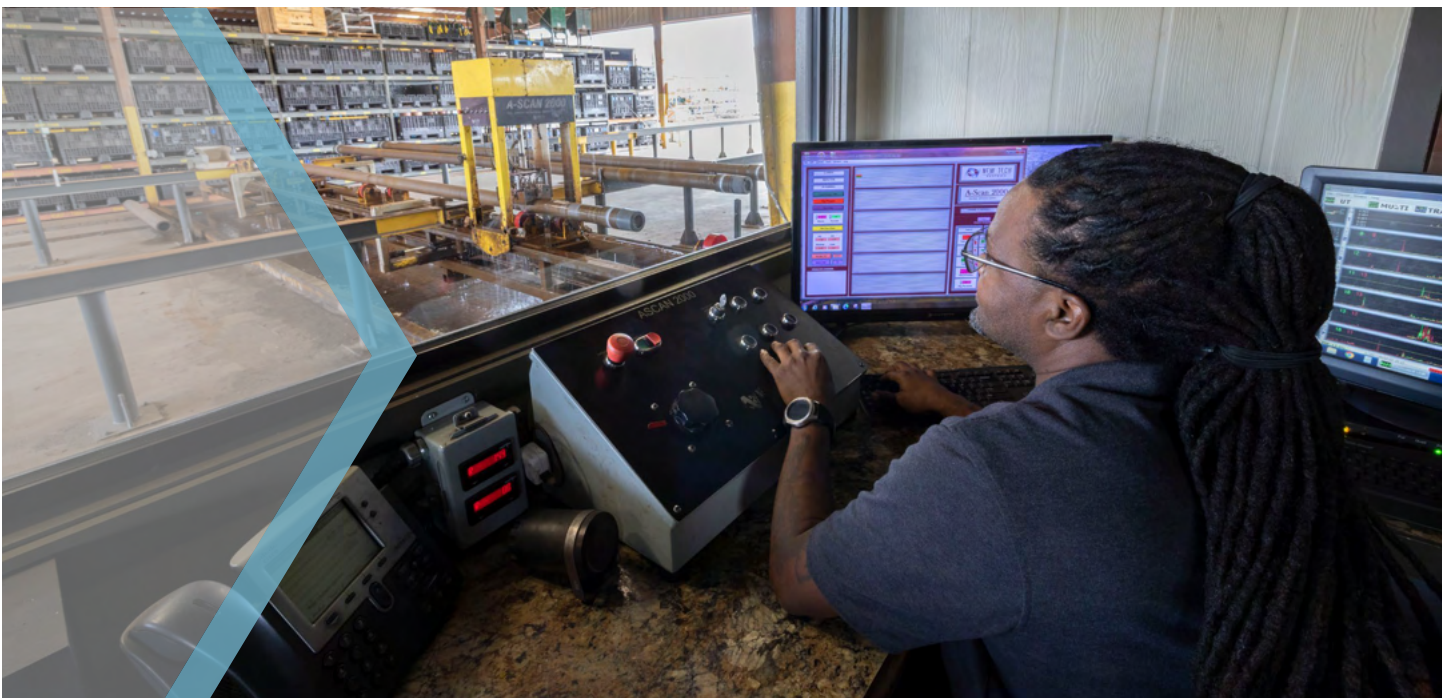
Each of us is responsible for ensuring that the information we record is accurate, timely, complete, and maintained in a manner that is consistent with our system of internal controls.

Make Sure You:

- Create business records that accurately reflect the truth of the underlying event or transaction.
- Write carefully and clearly in all your business communications, including emails, with the understanding that those records may one day become public documents.
- Never destroy documents in response to or in anticipation of an investigation or audit.
- Contact the Legal Department if you have any doubt about the appropriateness of record destruction.

Watch Out For:

- Financial entries that are unclear, incomplete, or that hide or disguise the true nature of any transaction.
- Undisclosed or unrecorded funds, assets, or liabilities.
- Improper destruction of documents.





PROTECTING OUR ASSETS

Every employee is responsible for the proper use of Superior's assets, protecting them from waste, abuse, or loss. Company assets include information and data, vehicles, tools, materials, supplies, time, intellectual property, computer systems, communications sent to or from the Company, software, hardware, and facilities.

Limited, personal use of Company assets—including assigned vehicles and electronic media such as phones and email—is permitted. Such use should be kept to a minimum and have no adverse effect on productivity and the work environment.

Company information and data, whether stored on devices owned or leased by Superior, by third parties, or on employees' own devices, remain the property of the Company.

Make Sure You:

- Treat Superior assets the same way you would your own property.
- Do not use Superior equipment or information systems to create, store, or send content that others might find offensive.
- Secure sensitive information, including hard copies, electronic documents and files.
- Respect the copyrights, trademarks and license agreements of others when dealing with printed or electronic materials, software, or other media content.

Watch Out For:

- Requests to borrow or use Superior equipment without approval.
- Lax enforcement of electronic access control cards.
- Phishing scams or other attempts to uncover sensitive personal or corporate information.
- Email attachments.
- URLs from unfamiliar sources.
- Sharing passwords.



FRAUD AND IRREGULAR ACTIVITIES

Consistent with our high standards, misappropriation, fraud, and similar irregularities by employees are strictly prohibited. Examples of such activities include:

- Any dishonest or fraudulent act.
- Embezzlement.
- Forgery or alteration of checks or other negotiable instruments of Superior.

If an employee is uncertain whether their conduct constitutes fraud, or if they are directed to take any action they believe will constitute fraud, they should immediately contact their supervisor or manager or Superior's Vice President of Ethics and Compliance, or Chief Financial Officer.

CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

Each of us must take steps to protect Superior's confidential information by keeping it secure, limiting access to those who need this knowledge to do their job and avoiding discussion of confidential information in public areas.

Those with access to Company intellectual property must not disclose it to anyone, including friends and family members, unless authorized by Superior or legally required. Intellectual property created on the job or with Company resources belongs to Superior and cannot be used for personal gain.

The obligation to preserve confidential information continues even after your employment at Superior ends.

In addition to protecting our confidential information and intellectual property, we respect the valid intellectual property rights of others.



Make Sure You:

- Protect intellectual property and confidential information by sharing it only with authorized parties.

Watch Out For:

- Unintentional exposure of confidential information in public settings such as on phone calls or while working on your laptop.
- Loss of control of confidential information. When sending information to third parties, make sure that the transmissions are for legitimate business reasons and that they comply with local law.



COMMUNICATING WITH THE PUBLIC

Because Superior needs a consistent voice when communicating with the public, it is important that only authorized persons speak on behalf of the Company.



USING SOCIAL MEDIA

Be careful when writing communications that might be published online. If you participate in online forums, blogs, newsgroups, chat rooms, or bulletin boards, think carefully before you hit the “send” button. Remember: your social media use may be monitored by the Company.

- Never comment on confidential and non-public Company information such as the Company’s current or future business performance or business plans.
- Do not use the trademark, logo, or any other intellectual property of Superior or any of its affiliates unless you have permission from the Business Unit Leader.
- Be fair and courteous. Never post content that may be viewed as malicious, obscene, harassing, defamatory, or discriminatory.
- If you read an online comment about Superior that you believe is wrong or harmful to our reputation, do not respond. Instead, contact your manager or supervisor so that appropriate steps can be taken.





RESPONSIBLE TO THE CORE

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



CORPORATE CITIZENSHIP AND ENVIRONMENTAL RESPECT

Superior is committed to being recognized as a good neighbor in the communities where we live and operate, maintaining an open, ethical stance, respecting local cultures, customs and protecting the environment.

Our heavy equipment and presence in a community can have a significant impact on the people who live there. That's why we must always work and drive safely, keep our work sites secure, and above all be courteous and respectful of others.



COMMITTED TO HUMAN RIGHTS

Wherever we operate, we observe laws that pertain to freedom of association, privacy, recognition of the right to engage in collective bargaining, the prohibition of forced, compulsory and child labor, human trafficking, and laws that pertain to the elimination of employment discrimination. We also take steps to ensure that our business partners do what's necessary to meet these goals.

Make Sure You:

- Live up to our Shared Core Values when working in public.
- Respect local customs and cultures.
- Minimize any disruptive or negative impact that our work may have on the environment or community.

Watch Out For:

- Any indication that Superior or our business partners are not living up to our commitments to human rights, respect for the environment, and corporate social responsibility.
- Possible conflicts of interest arising from our participation in community activities.
- Requests from business partners to give to charitable causes. Like all other charitable contributions, these must be approved through the Company process.





RESPECT THE ENVIRONMENT

Together, we will do everything in our power to prevent our actions from damaging the environment. Committed to working with our customers, business partners and suppliers, we strengthen environmental stewardship and responsibility and will strive to implement industry environmental best practices whenever practical.

We expect employees to continuously improve our environmental performance through monitoring, pollution prevention, waste minimization, water and energy efficiency, effective use of raw materials, and by paying maximum attention to the efficient use of resources.

POLITICAL ACTIVITIES

Each of us has the right to voluntarily participate in the political process. While that includes making personal political contributions, always make it clear that those personal views and actions are not those of Superior.

Never make a political contribution on behalf of the Company, use our resources or facilities to support any political candidate or party, or engage in any lobbying activity unless specifically permitted by law and approved by the Chief Executive Officer.

Make Sure You:

- Obtain all necessary approvals before using any Superior resources to support political activities.
- Ensure that personal political views and activities are not viewed as those of Superior.
- Do not use our resources or facilities to support personal political activities.

Watch Out For:

- **LOBBYING**—Interactions with government officials or regulators that could be seen as lobbying require approval from the Chief Executive Officer.
- **PRESSURE**—Never directly or indirectly pressure another employee to contribute to, support, or oppose any political candidate or party.
- **IMPROPER INFLUENCE**—Avoid even the appearance of making political or charitable contributions to gain favor or exert improper influence.
- **CONFLICTS OF INTEREST**—Holding or campaigning for political office must not create, or appear to create a conflict of interest with our duties.



INSIDER TRADING

Federal and state securities laws make it illegal for anyone to trade in a company's securities if they have material, nonpublic information about that company. This is called "insider trading" and may result in civil or criminal penalties.

Make Sure You:

- Do not buy or sell securities of any company when you have material nonpublic information about that company.
- Do not communicate such material nonpublic information to other people.

Watch Out For:

- Requests by friends or family for information about Superior or companies we do business with. Even casual conversations could be viewed as illegal "tipping" of inside information.
- TIPPING—Make sure you do not share this kind of information with anyone, either on purpose or by accident. Doing so with anyone who might make an investment decision based on your inside information is considered "tipping" and is illegal regardless of whether you benefit from the outcome of their trading.



ANTITRUST AND FAIR COMPETITION

Because we believe in free and open competition, we never engage in practices that could improperly limit competition. We never seek to gain competitive advantages through unethical or illegal business practices.

Terminology

Antitrust laws are complex. While compliance requirements may vary, the following activities should generally be avoided and reported to the Legal Department.

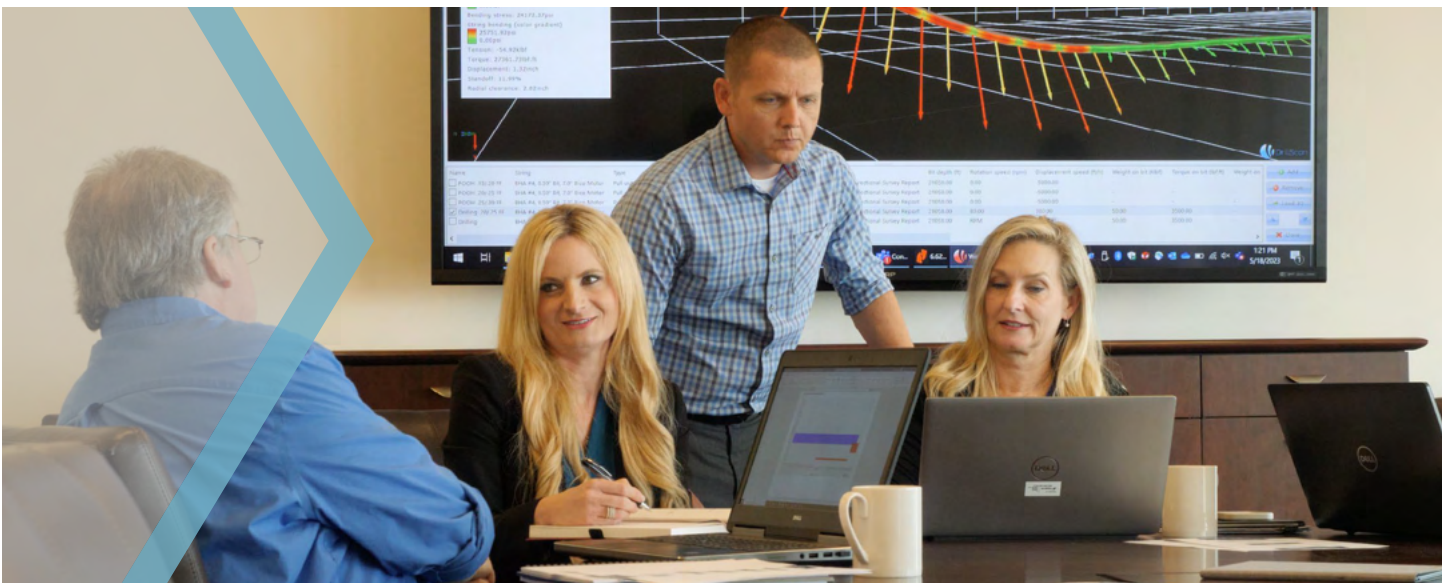
- **Collusion**—when companies secretly communicate or agree on how they will compete. This could include agreements or exchanges of information on pricing, terms, wages, or allocations of markets.
- **Bid-Rigging**—when competitors or service providers manipulate bidding to limit fair competition. This may include comparing bids, agreeing to refrain from bidding, or knowingly submitting noncompetitive bids.
- **Tying**—when a company with market power forces customers to agree to services or products that they do not want or need.
- **Predatory Pricing**—when a company with market power sells a service below cost so as to eliminate or harm a competitor, intending to recover the loss of revenue later by raising prices once the competitor has been eliminated or harmed.

Make Sure You:

- Do not enter into agreements with competitors to engage in any anti-competitive behavior, including setting prices or dividing up customers, suppliers, or markets.
- Never share the Company's competitively sensitive information with a competitor of the Company.
- Never share competitively sensitive information of business partners or other third parties with their competitors.

Watch Out For:

- Conversations with competitors about competitively sensitive information. Even a casual conversation may violate competition law.
- Obtaining nonpublic information about competitors from new hires or candidates for employment.



ANTI-CORRUPTION AND BRIBERY

Superior has a commitment to ethics and integrity. All countries prohibit the bribery of their own public officials and many also prohibit the bribery of officials of other countries. Our policy goes beyond these laws and prohibits improper payments in all our activities, both with governmental entities and in the private sector.

We do not pay bribes or kickbacks, at any time for any reason. This applies equally to any person or firm who represents the Company (such as consultants, agents, sales representatives, distributors, or contractors).

It is especially important that we carefully monitor third parties acting on our behalf. Always be sure to perform due diligence and know our business partners, and all those through whom we conduct our business. They must understand that they are required to operate in strict compliance with our standards and to maintain accurate records of all transactions.

"FACILITATING PAYMENTS"

Facilitating payments refers to small payments demanded by low-level foreign government officials to perform routine clerical functions that the company is legally entitled to. Under current U.S. law, these payments may be allowed.

However, such payments (even if acceptable under U.S. law) may be serious violations of another country's laws and therefore are prohibited by Superior.





IF YOU ARE EVER OFFERED OR ASKED FOR A BRIBE

Our response to requests for improper payments is critically important and must demonstrate our unequivocal commitment to the law and our policies. To that end, all Superior personnel must remember:

- If you hear rumors of improper payments or red flags, report them immediately to the Legal Department or the Ethics and Compliance Department.
- 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 parties 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.
 - Make it clear that your refusals are absolute, and do not come with a "wink and a nod."
 - Consult immediately with the Legal Department or the Ethics and Compliance Department regarding next steps.

Make Sure You:

- Never give anything of value to any governmental official that is contrary with local laws and regulations. If you are not sure what the local laws are, the safest course of action is to not give anything of value.
- Understand the standards set forth under anti-bribery laws that apply to your role at Superior.
- Accurately and completely record all payments to third parties.
- Do not make "facilitating payments." If you are asked to do so, immediately consult the Legal Department or the Ethics and Compliance Department.

Watch Out For:

- Apparent violations of anti-bribery laws by our business partners.
- Agents who do not wish to have all terms of their engagement with Superior clearly documented in writing



GLOBAL TRADE

We honor the trade, import, and export control laws of all countries in which we operate and expect our business partners to do the same. Remember, trade requirements often change and certain local or regional laws may conflict. To avoid these problems, consult the Legal Department as early as possible.

ANTI-BOYCOTT REGULATIONS

As a U.S. Company, Superior is subject to the anti-boycott provisions of U.S. law that require us to refuse to participate in foreign boycotts that the United States does not sanction.

Superior and its employees will not participate in boycotts. Further, we will promptly report to the U.S. Government any request to join in or support a non-U.S.-sanctioned boycott or furnish information concerning it.

Make Sure You:

- Obtain all necessary licenses before the export or re-export of products, services, or technology.
- Report complete, accurate and detailed information regarding every imported product, including places of manufacture and full cost.

Watch Out For:

- Transferring technical data and technology to someone in another country, such as through email, conversations, meetings, and database access. This restriction applies to sharing information with coworkers, as well as non-employees.
- Transporting Company assets that contain certain technology, such as a computer an associate takes on a business trip to another country.





ANTI-MONEY LAUNDERING

Money laundering is a global problem with far-reaching and serious consequences. Defined as the process of converting illegal proceeds so that funds appear legitimate, it is not limited to cash transactions. Involvement in such activities undermines our integrity, damages our reputation, and can expose Superior and involved individuals to severe sanctions. Many laws and regulations require reporting such suspicious transactions and activities to government agencies.

Employees must comply with all applicable anti-money laundering and anti-terrorism requirements, which prohibit:

- Engaging in any financial transactions involving property, funds, or monetary instruments that, directly or indirectly, promote or result from criminal activity.
- Receiving, transferring, transporting, retaining, using, structuring, diverting, or hiding the proceeds of any criminal activity, or aiding or abetting another in any such action.
- Engaging or becoming involved in, financing, supporting, or otherwise sponsoring, facilitating, or assisting any terrorist person, activity, or organization.





WAIVERS AND AMENDMENTS

Any waiver to our Shared Core Values involving an employee who is not an executive officer must be approved by the Chief Executive Officer, or pursuant to policies and procedures approved by the Chief Executive Officer. Any waiver for a director or executive officer must be approved by the Audit Committee and, if appropriate, the Board of Directors in accordance with applicable law. Any waiver approved for a director or executive officer will be promptly disclosed to the extent required by law, regulations or listing standards.

SUPERIOR U.S. HOTLINE: 833-293-3439

Country-Specific Numbers

Angola: +226434276 (all carriers)

Argentina: 0800-333-0095

Australia: 1 800 763 983

Brazil: 0 800 892 2299 (All Carriers)

Brazil: 21 2018-1111

Brazil: +55 800 008 9024

Canada: 1-800-235-6302

Colombia: 01-800-5189703

Colombia: 6013816523

Germany: (0)800 181 2396

Indonesia: 0800 1503216

Indonesia: 21 50851420

Kuwait: 227-9501

Malaysia: +60 1 800 81 3692

Mexico: 800 681 6945

New Zealand: 0800-002-341 (all carriers)

Norway: 800 62 492 (all carriers)

Singapore: 800-852-3912 (all carriers)

Thailand: 1 800 012 657 (depends on mobile carrier)

Thailand: 2105 6161

Trinidad/Tobago: 1-868-224-5814

United Kingdom: (0) 808 189 1053

United States: 1-800-461-9330



SCAN FOR FULL LIST OF NUMBERS



