

## **DistributionNOW Modern Slavery Act Transparency Statement**

This statement applies to NOW Inc., its affiliates, and subsidiaries (collectively referred herein to as “DistributionNOW”) and is made pursuant to Section 54(1) of the UK Modern Slavery Act 2015 (herein referred to as “the Modern Slavery Act.”). DistributionNOW is a global distributor of products to energy and industrial markets and also provides supply chain management to drilling contractors, E&P operators, midstream operators and downstream energy and industrial manufacturing companies around the world. In the United Kingdom, DistributionNOW currently conducts operations primarily through MacLean International Group Limited and its subsidiaries (collectively the “DistributionNOW UK Companies”).

Pursuant to the Modern Slavery Act, organisations which supply goods and services, carry on a business or part of a business in the United Kingdom, and have a total global annual turnover of at least £36 million are required to publish a slavery and human trafficking statement for each financial year. This statement represents the values and standards of the DistributionNOW UK Companies as well as any affiliates or subsidiaries which may become integrated with DistributionNOW in the United Kingdom in the future.

In 2020, DistributionNOW launched a global Human Rights Policy which specifies our commitment to respecting the human rights and dignity of employees and individuals within our operations and supply chain and in the communities where we do business. DistributionNOW also monitors and enforces these obligations through our Code of Conduct, which prohibits the use of any form of child or forced labor, slavery, or human trafficking. DistributionNOW will continue to work with its employees, suppliers, and representatives to ensure that our operations are free from those practices and we promote the health and safety of our workers everywhere. In addition, we ensure compliance with fair wage and hour laws in all DistributionNOW operations. At DistributionNOW, we will not knowingly conduct business with any supplier or other business partner who violates these standards. Our commitment to human rights and preventing modern slavery includes encouraging our stakeholders to report any suspected violations or concerns. These reports can be made through DistributionNOW’s anonymous Ethics & Compliance Hotline (visit <http://www.distributionnow.com.ethicspoint.com> for applicable country dialing information) or via email to [Risk.Mitigation@dnw.com](mailto:Risk.Mitigation@dnw.com). No reprisal or retaliation will be taken against any employee found to be raising concerns in good faith. DistributionNOW will investigate, address and respond to the concerns of employees and will take appropriate actions as needed.

DistributionNOW UK Companies have: (i) continued to hold suppliers and other business partners accountable for compliance with DistributionNOW’s human rights standards, (ii) as part of the tender process, require suppliers and other business partners to confirm that they do not, nor will they in the future, support or knowingly do business with any other party involved in any act of slavery or human trafficking as defined in the Modern Slavery Act, and (iii) continued utilizing the DistributionNOW UK Companies’ standard terms and conditions of purchase which specifically require suppliers and other business partners to comply with and enforce the Modern Slavery Act and DistributionNOW’s human rights standards in its

policies. Failure of suppliers or business partners to provide the confirmation specified above or to comply with the DistributionNOW UK Companies' standard terms and conditions of purchase may lead to termination of business dealings with such suppliers and other business partners.

This statement has been approved by the board of directors of the DistributionNOW UK companies and the Legal and Compliance Departments of DistributionNOW are responsible for oversight and implementation. This transparency statement is reviewed and updated as necessary (at least on an annual basis) to ensure that the statement is up to date with the current DistributionNOW processes and controls.



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Brittany Thigpen  
Director of Corporate Compliance  
DistributionNOW



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Alan Freeland  
Board of Directors  
Maclean International Group Limited