

DistributionNOW

HUMAN RIGHTS POLICY



Respect Is Our Mission

The mission and values of NOW Inc., its subsidiaries, and affiliates (collectively referred to herein as "DistributionNOW") reflect our unwavering respect for human dignity and fundamental human rights. We strive to respect and promote human rights in accordance with all legal requirements and international human rights standards, including the UN Guiding Principles on Business and Human Rights, International Labor Organization Forced Labor Conventions, as well as in our relationships with our employees, suppliers, customers, agents, and representatives. Our aim is to conduct business in a socially and environmentally responsible manner, respecting the law and universal human rights to benefit the communities in which we operate and as part of our ongoing global sustainability strategy.

This Policy is guided by international human rights principles encompassed by the Universal Declaration of Human Rights (<https://www.un.org/en/about-us/universal-declaration-of-human-rights>). DistributionNOW expects its customers, suppliers, agents, and representatives to uphold these principles when working with DistributionNOW and urges them to abide by and adopt similar policies within their own businesses.

While human rights are the responsibility of all of us at DistributionNOW, executive oversight, and responsibility for the implementation of this Policy rest within our Legal and Compliance Departments. The Environmental, Social, Governance ("ESG"), and Nominating Committee of DistributionNOW's Board of Directors oversee this Policy at the board level as a part of its oversight responsibilities on ESG efforts. We incorporate relevant findings into our policies and procedures as needed, based upon regular assessments as part of DistributionNOW's efforts to continuously improve. DistributionNOW reserves the right to amend this Policy at any time.

Company, Community, and Stakeholder Engagement

At DistributionNOW, we use due diligence as a means to identify and prevent the infringement of human rights on people in our business and supply chain. We strive to provide and/or cooperate in the provision of effective remedies when adverse human rights impacts occur as a result of our activities. We operate in continuous improvement and are committed to identifying and responding to concerns. We seek to promote access to remediation where we are linked to, or involved in, those adverse impacts through our relationships with third parties.

We recognize that we are an integral part of the communities in which we operate. By directly engaging people in the communities we service, we create a transparent dialogue to try and listen and learn from alternative views in how we conduct our business. Where appropriate, we engage with a wide range of stakeholders on human rights issues related to our business. This includes issues within DistributionNOW and across our supply chain through which we seek to promote respect for human rights.

Forced Labor and Human Trafficking

DistributionNOW commits to respecting and honoring human rights in its operations and facilities. We do not use or condone the use of child, forced, compulsory, indentured, or involuntary labor in our business and we work with our employees, suppliers, agents, and representatives to ensure that our operations are free from these practices. DistributionNOW will not knowingly conduct business with any supplier who violates these standards. Any employee who is found to violate these standards will be subject to disciplinary action up to, and including, termination. DistributionNOW may actively seek to recoup any losses that it incurred as a result of violation of these standards from any individual or entity who carried out such conduct. We prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery, and any form of human trafficking.

Work Hours, Wages, and Benefits

We strive to fairly compensate employees relative to our industry and local labor markets as well as in accordance with terms of applicable collective bargaining agreements, fair wage, and labor laws. We work to ensure full compliance with applicable wage, work hours, overtime, and benefits laws.

Diversity and Inclusion

DistributionNOW values and advances the diversity and inclusion of people. We are committed to equal opportunity and are intolerant of discrimination and harassment, which aligns with our commitment to respect the right of all individuals including those which may be particularly vulnerable to adverse impacts. We strive to maintain workplaces that are free from discrimination or harassment based on race, sex, color, national or social origin, ethnicity, age, disability, sexual orientation, gender identification or expression, or any other status protected by applicable law. The basis for recruitment, hiring, placement, development, training, compensation, and advancement at DistributionNOW is qualifications, performance, skills, and experience.



Diversity and Inclusion (continued)

We do not tolerate intimidation or retaliation of any kind in the workplace. Harassment is not tolerated in the workplace and in any work-related circumstance outside of the workplace. Security safeguards for employees are provided, as needed, and are maintained with respect for employee privacy and dignity. DistributionNOW understands that diversity, equity, and inclusion must be embedded in the business and addressed as a priority throughout the organization. Our responsibility to integrity lies at the core of our culture. We work every day to ensure an open, inclusive, and ethical work environment in which our employees strive to do the right thing and to ensure the long-term success at DistributionNOW.

Guidance and Reporting for Employees

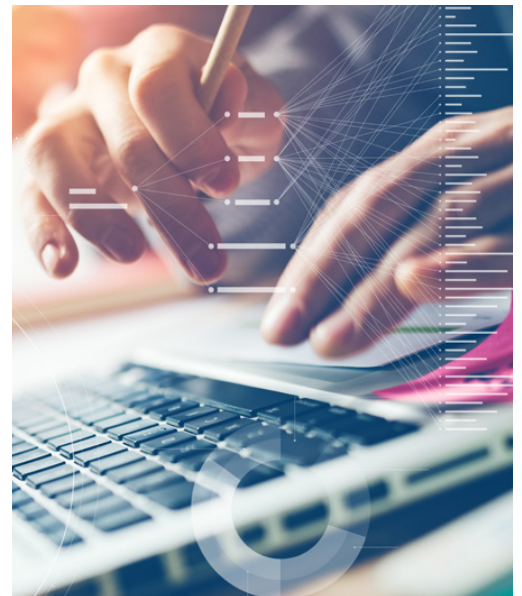
We strive to create workplaces in which open and honest communications among all employees are valued and respected. DistributionNOW is committed to comply with applicable labor and employment laws where we operate. Any employee who has questions about this Policy or would like to report a potential violation of this Policy should raise those questions and concerns with local management, Human Resources, the Legal Department, or the Corporate Compliance Department. Employees can also report suspected policy violations through DistributionNOW's anonymous Ethics & Compliance Hotline (visit <https://secure.ethicspoint.com/domain/media/en/gui/40906/index.html> for applicable country dialing information) or via email to Risk.Mitigation@dnw.com. We encourage our employees, suppliers, and stakeholders to speak up, without retribution, about any concerns. We will not tolerate retaliation or reprisal against any workers, suppliers, or others for having reported suspected violations of this Policy. The Company will investigate, address, and respond to the concerns of employees and will take appropriate corrective action, if needed, in response to any violation.

This Human Rights Policy is aligned with our Code of Business Conduct and Ethical Standards (<https://ir.dnow.com/static-files/0553c9c4-11b0-4249-bc88-76436dda4bb8>) as well as our other Corporate Compliance statements (<https://www.dnow.com/company/corporate-citizenship/compliance-statement>).

Public Reporting

We report to the public on our human rights-related commitments, efforts, and statements, consistent with this Human Rights Policy, as part of our annual ESG Report:

<https://www.dnow.com/company/corporate-citizenship/corporate-sustainability>.



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