



Effective Date: 02/21/2020

Revision Date: 03/26/2020

Revision No. 1

Page 1 of 4

## Forced Labor Policy

### **I. PURPOSE**

National Oilwell Varco (“NOV”) and its subsidiaries and affiliates (collectively referred to as the “Company”) and all directors, officers, employees, agents, suppliers, representatives, and joint venture partners of the Company shall respect and honor human rights in all our operations and facilities. This Policy is guided by the principles of the International Labor Organization (ILO) conventions and national laws and outlines the Company’s stance regarding forced.

### **II. BACKGROUND**

According to ILO data<sup>1</sup>, over 24 million people were victims of forced labor in 2016, of whom about 17 percent were children aged 5-17 years. Forced or compulsory labor shall mean all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself or herself voluntarily. Forced labor is the most common element of modern slavery and is the most extreme form of people exploitation. This happens in the context of poverty, lack of sustainable jobs and education, as well as a weak rule of law, corruption and an economy dependent on cheap labor. Child labor refers to the exploitation of children through any form of work that deprives children of their childhood, interferes with their ability to attend regular school, and is mentally, physically, socially or morally harmful.

NOV is a multinational corporation and leading provider of goods and services to the upstream oil and gas industry and as such has a responsibility to conduct all business in an ethical manner with integrity. Our Code of Business Conduct and Ethics “the Code” outlines a standard of ethical conduct that we expect all NOV employees to follow in our operations worldwide and wherever NOV does business. As specified in the Code, NOV does not condone or permit the use of child, forced, indentured or involuntary labor in any of our operations. In addition, the Company supports the fundamental principles of the UN Universal Declaration of Human Rights, the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the UN International Covenant on Civil and Political Rights and the UN International Covenant on Economic, Social and Cultural Rights.

### **III. APPLICABILITY**

This Policy applies to all directors, officers, employees, agents, suppliers, representatives, and joint venture-partners of the Company worldwide.

<sup>1</sup> [https://www.ilo.org/wcmsp5/groups/public/---dgreports/---stat/documents/meetingdocument/wcms\\_636050.pdf](https://www.ilo.org/wcmsp5/groups/public/---dgreports/---stat/documents/meetingdocument/wcms_636050.pdf)



Effective Date: 02/21/2020

Revision Date: 03/26/2020

Revision No. 1

Page 2 of 4

## Forced Labor Policy

### **IV. POLICY**

Company commits to:

- Providing a work environment free of unlawful discrimination and harassment based on any status such as race, color, creed, religion, sex, gender, national origin, age or any other status or activity protected by applicable law.
- Rejecting forced labor and child labor and working to ensure that our operations are free from these practices. We do not condone the use of child, forced, bonded, indentured or involuntary labor of any kind within our operations. NOV defines “child” as less than 15 years of age or 18 years of age for hazardous work.
- Promoting the health and safety of our workers everywhere.
- Conducting recruitment of employees in a manner that is in compliance with this policy.
- Ensuring compliance with fair wage and hour laws in all our operations and respecting the principles of the International Covenant on Economic, Social and Cultural Rights.
- Respecting freedom of association and cooperating in good faith with the bodies our employees choose to represent them within the appropriate national legal frameworks.
- Working to ensure there is no forced labor involved within our supply chain.
- Select suppliers that agree to be in compliance with this policy, not knowingly conduct business with any supplier or other business partner who violates these standards and will engage in appropriate measures including the termination of any business dealings if any such material violations are found to exist.
- Respecting the rights of people in communities impacted by our activities and taking appropriate steps to avoid, minimize and/or mitigate any adverse impacts to Human Rights.
- Requiring our consultants, suppliers, agents and business partners who conduct work on our behalf to uphold similar values and principles.
- Providing a grievance mechanism for all employees, individuals and communities to report any concerns relating to forced labor and child labor within our operations or the communities where we conduct business.

### **V. PENALTIES FOR VIOLATIONS**

The penalties for violating forced labor laws can be severe, and in the United States may include the following:

- A. Merchandise subject to withhold release orders (i.e., prohibition of importation of certain items)
- B. Seizure of merchandise
- C. Penalties – Penalties can be equal to the value of the merchandise for civil penalties and \$250,000 per violation for criminal penalties (18 USC 1001, 18 USC 545)
- D. Criminal penalties -Imprisonment for up to 20 years per violation (18 USC 545)
- E. Revocation of import privileges
- F. Disqualify any supplier known to be in violation of this policy



Effective Date: 02/21/2020

Revision Date: 03/26/2020

Revision No. 1

Page 3 of 4

## Forced Labor Policy

In addition to the penalties listed above, any officer or employee of the Company who violates forced labor laws or this Policy will be subject to disciplinary action, up to and including termination for cause. The contracts of any director, agent, representative, or joint venture partner of the Company may be terminated for cause if the director, agent, representative or joint venture partner violates any forced labor laws or this Policy. The Company may actively seek to recoup any losses that it incurs as a result of a violation of any of these laws or this Policy from the individual or entity that carried out the prohibited conduct. The Company will not reimburse any fines or penalties for violations of forced labor laws except where required by law or contract and permissible by law.

### **VI. REPORTING VIOLATIONS**

If you suspect or believe that a violation of this Policy or forced labor laws has occurred, you should immediately report it to NOV's Compliance or Legal Department. These reports may be made anonymously where permitted by local law using the Hotline discussed below. NOV provides all employees with several methods to report violations of the Company's Legal and Ethical Standards, including the following:

1. These websites provide a quick and simple reporting process, in your local language.

- Website reporting: <https://Ethicshotline.nov.com>

2. Call the Ethics Hotline:

- United States – 1-800-676-4380
- United Kingdom – 0-808-134-9875
- Norway – 800-24-876
- Canada – 1-800-532-4380
- Brazil – 0-800-020-1540
- Argentina – 0800-666-0763
- United Arab Emirates - 8000320412
- China – 400-120-8523
- Singapore – 65-31583056
- Mexico – 01-800-681-9201
- Russia – 8-800-301-6978

Phone numbers for all other countries may be found at the website listed above.



Effective Date: 02/21/2020

Revision Date: 03/26/2020

Revision No. 1

Page 4 of 4

## Forced Labor Policy

3. Email the Risk Mitigation Team at: [risk.mitigation@nov.com](mailto:risk.mitigation@nov.com)

4. Write the Risk Mitigation Team:

- Attn: VP Internal Audit  
National Oilwell Varco  
7909 Parkwood Circle Drive  
Houston, Texas, 77036-6565, USA

The Corporate Risk Mitigation Team is not associated with any particular business unit or group and will keep your report confidential to the extent practical while investigating the situation. The Corporate Risk Mitigation Team will work with Internal Audit, Legal, Human Resources, the NOV Compliance Group and all levels of Management to appropriately investigate and address all reported violations.