



## **Supplier Code of Conduct**

### **Mission**

Pioneer's mission is to be America's leading independent energy company, focused on value, safety, the environment, technology and our greatest asset, our people.

### **Role of Pioneer Contractors, Suppliers and Service Providers ("Suppliers")**

Suppliers are expected to adhere to the Pioneer Natural Resources Supplier Code of Conduct as outlined herein and Pioneer's Code of Business Conduct and Ethics, which can be viewed at [www.pxd.com](http://www.pxd.com) under the "Governance" tab. In the event of any conflict between this Supplier Code of Conduct and Pioneer's Code of Business Conduct and Ethics, the terms contained in the Pioneer Code of Business Conduct and Ethics shall govern to the extent of the conflict.

Pioneer developed this Supplier Code of Conduct to provide additional clarity to our suppliers regarding our expectations in conducting business with Pioneer. By providing goods and services to Pioneer, each supplier agrees to these principles and guidelines outlined in this Supplier Code of Conduct and agrees not to take any action that would cause Pioneer or any of its employees to be in violation of the Code set forth herein.

The relationships Pioneer cultivates with Pioneer Suppliers are an important part of Pioneer's business. Pioneer values a strong working alliance, and understands that both respect and communication are essential. Pioneer sets its expectations and ethical standards high, and strives to work with companies that value the same standards as Pioneer. Pioneer wants to work with the best Suppliers in the business.

As outlined in Pioneer's Code of Business Conduct and Ethics: business integrity, safety and environmental stewardship are Pioneer's main priorities. Pioneer's standard service agreements contractually obligate Pioneer's onsite Suppliers to comply with the Pioneer Code of Business Conduct and Ethics, in addition to Pioneer's Human Rights Policy and Commitment. There are no exceptions to these obligations. Pioneer assesses every supplier through an extensive prequalification process based on the specific work type. Pioneer Supply Chain Management utilizes its procure-to-pay process to encourage sustainable practices within the Pioneer Supplier community. Pioneer promotes collaboration and continuous improvement from Pioneer's business partners and works upfront with Suppliers to set expectations and ensure accountability.

Safety and environmental stewardship are integral to Pioneer's relationship with its Suppliers. Pioneer programs and goals are communicated to our Suppliers starting with their initial set up

as a Pioneer Supplier continuing through ongoing Supplier Performance Management conversations.

In such, Pioneer will conduct audits on its supplier base. Suppliers are expected to keep accurate and detailed books and records relating to goods and services provided to Pioneer. These books and records shall be made available to Pioneer for audits and Supplier shall agree to cooperate fully with an audit.

Pioneer's contracts require that Suppliers conduct their performance for Pioneer by the principles and standards set forth in the Code of Business Conduct and Ethics, as well as their own ethics and conduct policies.

## **RESPECT Values**

Pioneer's RESPECT core values are the backbone of our company. These values extend to Pioneer's relationships with its Suppliers. Pioneer's RESPECT core values are:

### **Respect**

We respect one another and the communities in which we operate.

### **Ethics and Honesty**

We are ethical and honest and committed to upholding our strong reputation.

### **Safety and Environment**

We believe no job is so important that it cannot be done in a safe and environmentally sound manner.

### **Personal Accountability**

We are disciplined and personally accountable for our decisions, actions, attitude and results.

### **Entrepreneurship**

We have an entrepreneur's mindset, driving innovation and striving for excellence in all we do.

### **Communication**

We openly and professionally communicate among all levels and between departments and teams.

### **Teamwork and Inclusion**

We believe in diverse perspectives and teams collaborating toward common objectives with a can-do attitude.

## Human Rights Policy Statement

Pioneer embraces human rights principles as contained in the Constitution of the United States and similar international human rights principles articulated by the United Nations. Suppliers are expected to respect the dignity of all human beings and embrace the inalienable right of all people to live their lives free from all forms of discrimination or abuse. It is each Supplier's responsibility to ensure that discrimination or abuse does not happen in any Pioneer setting. Suppliers should avoid knowingly causing or contributing to adverse human rights impacts through Pioneer operations and should endeavor to use Pioneer's influence to see that such discrimination is identified and addressed within Pioneer's Supply Chain and Contracts. Pioneer Suppliers will comply with the Human Rights Policy and should contact the Legal Department with any questions or concerns regarding human rights.

Pioneer's commitment to Human Rights are:

1. The fundamental human rights of all individuals, including but not limited to, life, liberty, and security shall be respected and protected equally and without discrimination in all facets and geographic regions of Pioneer's business.
2. Everyone is entitled to the same human rights without discrimination of any kind.
3. All individuals are entitled to the right to a remedy and equal protection under the law if their human rights are violated.
4. All individuals have the right to safe, fair, ethical, and humane working conditions, including no forced or compulsory labor or child labor.
5. No person shall be subjected to cruel, inhumane, or degrading treatment or punishment.
6. Pioneer respects the inherent rights of indigenous peoples, which derive from their political, economic, and social structures and from their cultures, spiritual traditions, histories, and philosophies, especially their rights to their lands, territories, and resources.

Pioneer recognizes and follows all federal, state, and local laws that apply to the geographic areas of operations. Pioneer goes beyond regulatory compliance with the industry best practices outlined in this and Pioneer's other policies and reporting. Pioneer recognizes that applicable labor laws and best practices may change over time as operational geography, products, services utilized, and operating context evolves.

Pioneer prohibits the use of child labor, forced labor, and promotes fair working conditions, wages, and a safe work environment in accordance with these initiatives.

## **Sustainability**

As a Permian pure-play operator, Pioneer is exceptionally mindful of how it contributes, directly and indirectly, to the economies of the communities where it operates and where its employees work and live. Pioneer is a good corporate citizen in the communities where it operates, and Pioneer hires a diverse set of suppliers to help support those communities. Suppliers are expected to share Pioneer's goals of corporate sustainability, diversity, and social responsibility. Onsite Suppliers are rated by Pioneer's third-party ESG and Sustainability assessment platform. Pioneer considers a Supplier's score when awarding agreements for work. Pioneer intends to work with Suppliers to assess risks related to ESG to encourage improved ESG performance.

## **Compliance and Anti-Bribery**

No Pioneer funds or assets may be paid, loaned, or otherwise disbursed as kickbacks or other payments designed to influence or compromise the conduct of the recipient, known as Bribery (as defined in the Pioneer Code of Business Conduct and Ethics). No Pioneer employee may accept any funds (other than compensation from Pioneer) or other assets (including, but not limited to, gift cards) for assisting or obtaining business or securing special concessions from Pioneer or any other person or entity. Pioneer insists its employees conduct its business based on arms-length relationships. Among others, the following conduct is expressly prohibited:

- Payment or receipt of money, gifts, entertainment, loans or other courtesies of value of greater than \$50 per year that, with respect to Pioneer, may tend to influence employee business decisions or compromise independent judgment.
- Payment or receipt of rebates or kickbacks for obtaining business for or from Pioneer.
- Any improper payments related to commercial bribery.

Pioneer may, consistent with its policies, the law and applicable regulations, pay normal and reasonable commissions to agents, take normal and commercially available prompt payment discounts, or give or receive gifts or services that are consistent with customary social amenities and that do not tend to compromise the independent conduct of the recipient.

Pioneer may, consistent with its policies, the law and applicable regulations, entertain customers or other third parties with whom Pioneer deals in a manner consistent with customary business practices. Customary business practices do not include entertainment that would compromise impartiality or raise questions about Pioneer's intentions or integrity. Pioneer employees are expected to comply with any known restrictions on gifts or entertainment imposed by the recipient's employer. Suppliers are expected to refrain from offering such gifts and entertainment.

## **Conflict of Interest**

- Pioneer personnel are required to comply with Pioneer's Code of Business Conduct and Ethics at all times, and Pioneer Suppliers shall not place Pioneer personnel in situations that would cause them to violate that Code.

- Pioneer personnel must avoid any conflict between their personal interests and the interests of Pioneer.
- Receiving or giving improper gratuities, favors or kickbacks is strictly prohibited. Upon request, Suppliers are required to provide written certification that no improper gifts have been provided, solicited or offered.
- Even when not accepted by Pioneer personnel, offers of an improper nature may be reported to Pioneer and may impact the vendor's relationship with our company.
- Pioneer cares about how business results are obtained, not just that they are obtained. Pioneer will support any employee who passes up an opportunity or advantage that would sacrifice our ethical standards.

## **HSE Expectations**

Pioneer respects the individual, community, and environment and is committed to protecting the environment from damage and protecting its employees and those who live near Pioneer areas of operation from injury and health risks. Pioneer's Health, Safety and Environmental (HSE) philosophy is that our job is never so urgent or important that we cannot take the time to do it safely and in a manner that is environmentally sound.

Pioneer's HSE Policy and HSE Commitment can be viewed at [www.pxd.com](http://www.pxd.com) under the "Safety" tab.

In the event of any conflict between this Supplier Code of Conduct and the HSE Policy and HSE Commitment located at [www.pxd.com](http://www.pxd.com), the terms contained in the HSE Policy and HSE Commitment shall govern to the extent of the conflict.

## **Safety**

Pioneer's goal is to conduct its operations in a manner that protects the safety of employees, Suppliers and others involved in its operations and the public. Accident prevention is everyone's role and Suppliers have a responsibility not to endanger themselves or others.

Suppliers must learn the safety procedures relevant to their jobs and not begin or continue with any work activity contrary to those procedures. Any Supplier uncertain of the safety procedures relevant to an operation must seek out a supervisor and be trained in those procedures before beginning the operation. In addition, Suppliers must use safety equipment as required by law, regulation and Pioneer procedures, manuals, handbooks and guidelines.

Suppliers are expected to correct or report safety hazards as required by law, regulation and Pioneer policies and procedures, and to report all workplace accidents no matter how minor. Supervisors are responsible for ensuring that Pioneer complies with workplace accident reporting regulations.

Suppliers must learn emergency procedures for accidents and natural disasters at their work sites. Supplier's supervisors are expected to ensure the employees who report to them are aware of these emergency procedures. Suppliers are also expected to ensure the safety of all personnel.

Suppliers are free to adopt other standards so long as the Supplier's standards are equal to or more stringent than those described above or cited in the policy.

Suppliers are encouraged to use Stop Work Authority for any unsafe activity. Suppliers are empowered to ask questions and "stop the job" if necessary.

## **Environment**

Pioneer is dedicated to a healthy environment. Pioneer will comply with the environmental laws and policies of the communities where it does business; and will make environmental issues and concerns a key part of its business decisions and actions.

Suppliers are expected at a minimum to follow the environmental laws that govern their work sites. Over and above these minimum standards, Suppliers should take care to minimize, to the extent reasonable in the circumstances, the impact of operations on the environment.

Suppliers are also expected to learn and follow the procedures and safety standards for handling, disposing and transporting hazardous materials. To the full extent required by law, regulations or facility procedure, Suppliers must respond to and report spills or releases and take appropriate remediation measures to minimize their impact on the environment. Suppliers are also expected to ensure environmental compliance. Suppliers are free to adopt other standards so long as the Supplier's standards are environmentally equal to or more stringent than those described above or cited in the policy.

## **Compliance Hotline**

The Pioneer Compliance Line provides an opportunity for anyone to anonymously report any suspicions of violations to any of the expectations outlined in this Supplier Code of Conduct or any other Pioneer policies or procedures.

Pioneer Natural Resources Compliance Line — Available 24/7  
In the U.S. 800.750.4972  
Outside the U.S. +1.704.97 3.0365 (call collect)

Anonymous reporting through the Compliance Line is made to a third-party compliance service provider. No one making a report to the Compliance Line will be required to provide their name or any other identifying information, and no caller I.D. or recording devices will be used to identify the reporter.

## **Summary**

Pioneer's relationship with its Suppliers is an important part of its business. Pioneer values a strong relationship built around the same standards and expectations. Pioneer strongly believes that this Supplier Code of Conduct in conjunction with the Pioneer Code of Business Conduct and Ethics will ensure that Pioneer and its Suppliers continue to remain the best in the business.

More information related to Pioneer's suppliers along with this Supplier Code of Conduct can be viewed at [www.pxd.com](http://www.pxd.com) under the "Suppliers" tab.

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