

2022



**GULFPORT ENERGY**

**SUPPLIER CODE OF CONDUCT**

# INTRODUCTION TO OUR SUPPLIER CODE OF CONDUCT

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Gulfport Energy is committed to developing strong, principled partnerships with our suppliers. We have adopted a Code of Business Conduct applicable to Gulfport employees, officers and directors that sets the standards for who we are and how we operate. Based on the principles of our Code of Business Conduct, this Supplier Code of Conduct communicates the expectations we have for ethical conduct and fair dealing.

Our relationships with vendors, contractors and suppliers are critical to achieving responsible and ethical corporate performance. Together, the Code of Business Conduct and the Supplier Code provide the foundation for relationships built on lawful and fair practices.

For the purposes of this Supplier Code, “supplier” refers to any company, corporation or other entity or person that provides, or seeks to provide, goods or services to Gulfport, and includes the supplier’s employees, agents, workers, representatives, contractors and subcontractors.

## COMPLIANCE WITH THE SUPPLIER CODE OF CONDUCT

Suppliers should carefully review the Supplier Code. Suppliers are responsible for ensuring that they comply with Gulfport’s standards of conduct. We expect our suppliers to avoid even the appearance of improper behavior. Suppliers must never act in any way that undermines compliance with the Code of Business Conduct or the Supplier Code. The Supplier Code also outlines important mechanisms for mutual accountability, including the requirement that Gulfport and its suppliers promptly report all ethical concerns involving Gulfport and cooperate in any investigation of alleged violations of the Code of Business Conduct or the Supplier Code.

Gulfport will terminate its relationship with any supplier that does not adhere to this Supplier Code and remove them from the company’s approved supplier list.







## RESPONSIBILITIES TO ONE ANOTHER AND THE COMMUNITIES WHERE WE OPERATE

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Gulfport expects its employees and business partners to respect one another and the unique character and contribution they bring to our operations. Treating each other with dignity, respect and fairness is the foundation of good business conduct. Gulfport and its suppliers must conduct their business interactions and activities in a respectful manner.

### Environmental, Health and Safety

Suppliers must share Gulfport's commitment to providing a safe and healthy workplace and conducting operations in an environmentally responsible manner. Suppliers are responsible for observing all environmental, health and safety laws, regulations, rules and permit requirements that apply to their operations. They must also take precautions to protect the environment and the health and safety of their employees, Gulfport employees, business partners and members of the communities in which we operate.

Suppliers must promptly report and take immediate steps to correct all accidents, injuries, unsafe or unhealthy conditions, and potential violations of environmental, health or safety laws, regulations or Gulfport policies. Requests to violate established environmental, health and safety procedures in connection with Gulfport-related activities must never be acted on and must always be reported. In addition, each supplier has the obligation to stop work activities that may represent a threat to safety or the environment. Suppliers are expected to uphold Gulfport's Environmental, Health and Safety Philosophy.

### Gulfport Energy Work Safe Program

The Gulfport Work Safe Program focuses on a combination of twelve rules derived from company policies (critical tasks) and cultural conditions that have been linked to serious safety incidents in our industry. Our goal is to not only improve our safety performance, but to help others focus on areas that are leading indicators for these incidents.

Without question, employees and suppliers are expected to live by, apply and follow the requirements that coincide with these twelve rules. As a supplier, you will receive additional information and training about this program prior to and during your time providing services to Gulfport.

### Dignity, Respect and Fairness

Suppliers must cooperate with Gulfport's commitment to an inclusive workforce free of unlawful discrimination. Gulfport requires that suppliers not engage in discrimination in any employment practice, including recruiting, hiring, compensation, benefits, transfer, termination, training or social or recreational programs, on the basis of race, color, religion, gender, sexual orientation, gender identity, age, national origin, military or veteran status, disability or any other legally protected characteristics.

### Harassment, Violence and Weapons

Harassment and violence have no place in the workplace or off-site. They are strictly prohibited in connection with Gulfport-related activities and will not be tolerated. Suppliers are expected to cooperate with Gulfport's commitment to prohibit harassment and threats of violence. Gulfport prohibits the possession of firearms, guns, explosives and any other weapons, as well as ammunition, while on Gulfport premises unless otherwise precluded by the laws of a particular jurisdiction.

### Drugs and Alcohol

Suppliers are expected to be free from the influence of alcohol, drugs and improperly used prescription medicine when conducting Gulfport's business, whether on or off Gulfport's premises.

### External Communications

Suppliers are prohibited from engaging in any communication representing Gulfport's opinion in any forum without prior written approval pursuant to applicable company policy.



# RESPONSIBILITIES TO STAKEHOLDERS, GOVERNMENTS AND COMMUNITIES

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All Gulfport suppliers must conduct business activities in full compliance with legal and regulatory requirements. Suppliers must be honest, direct and truthful in discussions with regulatory agency representatives and government officials.

## Antitrust Laws

Suppliers are expected to comply with applicable antitrust and fair competition laws and to not participate in any activity that could be considered a violation of antitrust laws.

## Anti-Corruption Laws

Suppliers must comply with all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act, which makes it a criminal offense to bribe or offer to bribe a foreign governmental or political official to obtain or retain business. No supplier may participate in bribes or kickbacks of any kind, whether in dealings with public officials or individuals in the private sector. Suppliers must not give, promise to give or offer to give anything of value, directly or indirectly, to a governmental official or employee, government agency, political party, public international organization or any candidate for political office in order to improperly influence any act or decision or otherwise improperly promote the business interests of Gulfport.

## Anti-Boycott Laws

Suppliers must not participate or support any international boycott that is not sanctioned by the United States government or applicable laws.

## Trade Laws

Suppliers must comply with applicable trade controls.

## Accounting and Disclosure Practices

Suppliers are expected to honestly and accurately record and report all matters related to business with Gulfport. Books, records, accounts and financial statements should be maintained in reasonable detail, appropriately reflect all transactions with Gulfport and conform to generally accepted accounting principles, applicable legal requirements and a system of internal controls. Suppliers shall make their books, records, accounts and financial statements available to Gulfport upon request.

## Records Retention

Suppliers shall create, retain and dispose of business records in compliance with all applicable legal and regulatory requirements. Further, suppliers must cooperate with Gulfport's business record retention needs if the supplier is advised or otherwise should recognize that a business record may be relevant to an audit, investigation or pending or threatened legal or regulatory proceeding.

## Political Activities

Without prior written approval pursuant to company policy, suppliers may not use Gulfport funds or resources for political activities, make any political contributions or present any gifts on behalf of Gulfport to any candidate for public office or elected official, or represent Gulfport or authorize any third party to represent Gulfport in making contacts with any federal, state or local government official (or member or employee of a legislative body or government agency) to influence policy, legislation, agency rules, regulations or any other official action.

## Charitable Giving

Suppliers shall not make or promise charitable contributions on Gulfport's behalf or take advantage of their relationship with Gulfport to inappropriately solicit Gulfport employees, suppliers or other business partners for contributions or to become involved in a nonprofit organization.



## RESPONSIBILITIES TO STAKEHOLDERS AND BUSINESS PARTNERS

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Building and maintaining relationships with our stakeholders through integrity and ethical practices is critical to our long-term success. All Gulfport suppliers must conduct all business activities in accordance with the following requirements.

### Fair Dealing

Suppliers must deal fairly with Gulfport's customers, suppliers, contractors, royalty owners, competitors, employees and other stakeholders. Suppliers must not take unfair advantage of anyone through manipulation, abuse of privileged or confidential information, misrepresentation, fraudulent behavior or any other unfair practice.

### Protection of Confidential Company Information and Personal Data

Suppliers must strictly adhere to all confidentiality obligations. Suppliers may not access, use, remove, copy or share confidential company information or personal data without a legitimate business purpose and prior written approval from Gulfport. Confidential information includes proprietary information regarding business activities and financial performance, as well as any nonpublic information that might be of use to competitors or harmful to Gulfport or its business partners if disclosed. Suppliers must be familiar with and abide by laws and regulations that govern the collection, use and disposal of personal data, including wage, salary, benefit and other confidential information related to Gulfport employees, contractors, directors, shareholders, royalty owners, customers and other business partners. Suppliers must ensure the confidentiality of this information and return all confidential information and personal data after their relationship with Gulfport ends.

### Insider Trading

Suppliers may not use or share insider information concerning Gulfport for trading in Gulfport or other securities. Insider information includes material nonpublic information about matters such as significant contracts, claims, liabilities, major litigation, potential sales, mergers or acquisitions, development plans, activities, earnings, forecasts and budgets.

### Protection of Gulfport Assets

Suppliers are expected to protect Gulfport assets against theft, loss and misuse. Gulfport assets include tangible items like buildings and equipment, as well as intangible items like

business plans and potential prospects. When operating a vehicle on Gulfport business, suppliers are expected to do so in a safe manner.

### Conflicts of Interest

Suppliers must avoid actual conflicts of interest or the appearance of conflicts of interest in business transactions and relationships involving Gulfport. A conflict of interest exists when private interests — financial or otherwise — interfere with Gulfport's interests. Conflicts of interest commonly arise when:

- A supplier uses Gulfport resources, such as facilities, equipment, materials, computers, office supplies, information or other assets, for personal gain or inconsistently with Gulfport's best interests;
- A supplier takes personal advantage of a business opportunity or investment opportunity made available because of their relationship with Gulfport; or
- A supplier has a family member or friend employed by Gulfport.

### Business Gifts and Entertainment

Suppliers are expected to understand and comply with Gulfport's policies governing business gifts and entertainment. Suppliers must never offer or provide personal incentives, rewards or bribes to any Gulfport employee, contractor or supplier in an effort to influence a business decision or gain an unfair advantage. Suppliers may offer reasonable gifts and entertainment consistent with customary business practices and in compliance with applicable law and company policy if they do not influence or appear to influence a Gulfport employee to act in a manner contrary to Gulfport's interests. Gulfport employees are required to report all supplier gifts and entertainment pursuant to Gulfport's gift and entertainment policy. Any item of value provided by a supplier is considered a gift — even if it is provided in conjunction with ordinary business activities. Suppliers are expected to make available upon request records detailing all gifts and entertainment provided to Gulfport employees or contractors.



# CONTACT

## How to Report a Concern

Suppliers are required to promptly report all concerns involving Gulfport, regardless of whether the concern involves the supplier, and must take reasonable steps to cooperate in Gulfport investigations. To report questionable behavior or a possible violation of the Code of Business Conduct or Supplier Code, you should:

- Consult the General Counsel or Legal Department at [legal@gulfportenergy.com](mailto:legal@gulfportenergy.com)
- Consult the Chief Compliance Officer or Compliance Department at [compliance@gulfportenergy.com](mailto:compliance@gulfportenergy.com)
- File a report using the Gulfport Ethics and Integrity Helpline by calling 833-254-0810 or visiting <https://gulfportenergy.ethicspoint.com/> (secure website)

To the extent possible, Gulfport will maintain the confidentiality of any individual reporting known or suspected misconduct. Gulfport will not tolerate any retaliatory acts, or the threat of retaliatory acts, against any individual for reporting known or suspected misconduct.