

## ADDENDUM C

### **Callon Petroleum Company Contractor Code of Conduct**

All contractors, suppliers, vendors, providers of goods and services, agents, representatives, and consultants (collectively, “Contractors”) are required to adhere to this Contractor Code of Conduct and Callon Petroleum Company’s Code of Business Conduct and Ethics (the “COBC”). In the event of any conflict between this Contractor Code of Conduct and the COBC, the terms contained in the COBC shall govern to the extent of the conflict.

Callon Petroleum Company (“Callon”) developed this Contractor Code of Conduct to provide additional clarity to our Contractors regarding our expectations in conducting business with Callon. Callon seeks to work with Contractors who contribute to sustainable development and are economically, environmentally, and socially responsible. By providing goods and services to Callon, each Contractor agrees to these principles and guidelines outlined in this Contractor Code of Conduct and agrees not to take any action that would cause Callon or any of its employees to be in violation of the COBC or this Contractor Code of Conduct.

Callon will develop and strengthen relationships with Contractors who are committed to the principles set forth in this Contractor Code of Conduct and the COBC, or to similar standards through their own activities and the management of their own vendors, suppliers and subcontractors.

As outlined in the COBC, Callon operates in accordance with the highest ethical standards and relevant laws. Callon places the highest value on the integrity of each of its employees and Contractors. Callon’s culture demands not only legal compliance, but also responsible and ethical behavior that aligns with Callon’s commitment to being a responsible corporate citizen. A commitment to doing the right thing and obeying the law, both in letter and in spirit, is the foundation upon which this Contractor Code of Conduct and the COBC is built. Callon’s integrity, reputation, and success ultimately depend upon the individual actions of our employees and Contractors.

Safety and environmental stewardship are integral to Callon’s relationship with its Contractors. Callon programs and goals are communicated to our Contractors starting with their initial set up as a Callon Contractor and continuing through ongoing conversations.

Callon conducts audits on its Contractor base. Contractors are expected to keep accurate and detailed books and records relating to goods and services provided to Callon. These books and records shall be made available to Callon for audits and Contractor shall agree to cooperate fully with an audit.

Callon’s contracts and service agreements require that Contractors be familiar with and comply with all of Callon’s rules and policies, including this Contractor Code of Conduct and the COBC, as well as each Contractor’s own ethics and conduct policies.

Anyone who violates the standards in this Contractor Code of Conduct will jeopardize their relationship with Callon, including possible termination of the relationship. If any Contractor becomes aware of a situation that may violate this Contractor Code of Conduct or the COBC, it

should report the concerns immediately in accordance with the procedures described in Section XVII of the COBC and in this Contractor Code of Conduct. No adverse action will be taken against anyone for making a complaint or disclosing information in good faith, and any retaliation against a person who in good faith reports any violation or suspected violation of this Contractor Code of Conduct or the COBC will be subject to disciplinary action, which may include termination of the relationship with Callon.

### **Human Rights Policy Statement**

Callon has great respect for the protection and advancement of human rights and is committed to operating its business in a manner that reflects those values. Callon's officers, directors, employees, and Contractors are expected to conduct business with integrity and observe universally recognized rights and freedoms. All Contractors are prohibited from engaging in any activity that supports, encourages, or is linked to forced labor, child labor, modern slavery, or human trafficking.

Callon values its stakeholders and respect the rights of local communities and those who live and work there, and expects its Contractors to do the same. Where people in local communities may be affected by Callon's operations, we strive to identify any potential adverse impacts in advance and take necessary steps to mitigate or eliminate such impacts. Callon monitors the impacts of our business operations on our neighbors and strives to create positive impacts on adjacent communities through local engagement and charitable programs.

Callon's commitment to Human Rights are more fully set forth in the Callon Petroleum Company Human Rights Policy.

### **Conflicts of Interest**

All Callon directors, officers, and employees (collectively, "Callon personnel") have the responsibility to ensure that business decisions are based solely on what is best for Callon and are not improperly influenced by personal interests. Callon personnel are required to comply with the COBC at all times, and Contractors shall not place Callon personnel in situations that would cause them to violate that COBC.

No illegal payment in any form (whether funds or assets) shall be made directly or indirectly to anyone for the purpose of obtaining or retaining business or to obtain any other favorable action. It is imperative that each and every person who does business with Callon understands that we will not, under any circumstances, give or accept bribes or kickbacks.

Receiving or giving improper gratuities, favors, or kickbacks is strictly prohibited. Contractors shall not offer or pay a bribe, kickback, item of value, or improper favor in order to secure a business advantage.

Gifts in a commercial setting are intended to create goodwill and sound working relationships. They can also, however, impair objectivity, create an actual or perceived conflict of interest and damage Callon's reputation for fair dealing. Contractor's shall not give any gifts to Callon personnel unless the gift has insubstantial value and does not tend to compromise the independent conduct of the recipient.

Callon is committed to conducting its business in accordance with the highest ethical

standards and seeks to outperform its competition fairly and honestly. Callon seeks competitive advantages through superior performance and thus will treat customers, business allies, competitors, and Contractors fairly and will not engage in unethical or illegal business practices.

### **Workplace Safety, Health and Environmental Stewardship**

Callon strives to provide Callon personnel and Contractors with a safe and healthy work environment. Each worker has a responsibility for maintaining a safe and healthy workplace by following safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions. The Callon values reflect our culture of safety and responsible environmental stewardship. We strive to ensure the health and safety of everyone working with us, and Contractors are expected to maintain a systematic approach to managing workplace safety, health and the environment that ensures compliance with law and is designed for continuous performance improvement.

Callon's greatest asset is its people; this means safety is a core value. Callon is committed to safety and security and expects the same of its Contractors. Callon's goal is zero workplace injuries and occupational illnesses, and Callon expects compliance with all applicable laws as well as safety procedures. No activity is so important that we cannot take the time to do it safely. We must all do our work in a way that minimizes risk to our fellow employees, contractors and others impacted by our actions. If at any time you do not feel that you or a co-worker can perform a job safely, you have stop-work authority to immediately stop the work and talk with your supervisor. Contractors are expected to correct and report safety hazards as required by law and regulation and if a safety incident occurs, contractors are expected to report it promptly. It is important to share best practice and near miss information, so we can learn from each other and improve safety practices. We will continually seek opportunities to improve safety, environmental, and regulatory compliance performance, and honor our responsibilities as a corporate citizen and expect the same from our Contractors.

Violence and threatening behavior are not permitted. If you become aware of any threat to safety, report it immediately. Firearms and other weapons are strictly prohibited on Callon property or on the person of any Contractor while conducting Callon business. Any acts or threats of violence should be reported immediately. In order to protect our work environment, Callon reserves the right to conduct searches on its property and to authorize searches by law enforcement on its property, in either case with or without Contractors being present. As circumstances warrant and as is consistent with applicable law, any person or vehicle entering a Callon facility is subject to search.

Callon is committed to the goal of safeguarding the environment and conducting its business in a manner designed to comply with all applicable environmental laws and regulations and applying responsible standards where such laws or regulations do not exist. Contractors must comply with all applicable environmental laws and regulations at a minimum and should strive to exceed the minimum legal requirements. We will work with governmental agencies, the communities in which we operate and responsible non-governmental organizations to enhance our environmental performance

## **Compliance Hotline**

Callon has also established a system for reporting violations of any Callon policies, as well as any suspected illegal activity or misconduct by any Callon personnel or Contractors. This may be done anonymously by calling Callon's toll-free Ethics Hotline at 1-844-471-7637. Complaints may also be filed anonymously at the following website: [callon.ethicspoint.com](http://callon.ethicspoint.com). Anyone reporting a suspected violation may remain anonymous.

## **Summary**

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