

SCIENTIFIC DRILLING

INTEROFFICE MEMORANDUM



TO All Employees
FROM Wes Shedd
SUBJECT Trade Compliance Policy Statement¹
DATE May 2, 2022

It is a fundamental policy of Scientific Drilling International, Inc., Applied Technologies Associates, Inc. and their subsidiaries and affiliates (collectively, “SDI”) to comply with all applicable US import and export laws and regulations, as well as the analogous laws and regulations of the other countries in which we conduct business. Strict adherence to these laws and regulations is required of every SDI employee whose work causes, affects, or supports trade.

This policy statement applies to all employees – foreign and domestic – whose efforts cause, affect, or support trade including the re-export of any commodity, technology, or software unless appropriate authorization has been first obtained.

Violations of these laws and regulations may result in serious criminal and civil penalties including fines, imprisonment, exclusion from the export/import licensing process, denial of export privileges, and other sanctions which would impact the entire business of SDI. Non-compliance with this policy statement, the applicable laws and regulations, and the procedures SDI has established will not be tolerated. Any violation will subject an employee to disciplinary action, up to and including termination.

If you have questions concerning the legitimacy of a transaction or potential violations, please contact the Trade Compliance group at tradecompliance@scientificdrilling.com.

A handwritten signature in blue ink, appearing to read 'Wes Shedd', on a light-colored background.

Wes Shedd
CEO and President

¹ This Trade Compliance Policy Statement will be issued annually or more often, if necessary.