



SUPPLIER CODE OF CONDUCT (October 1, 2020)

At Berry Corporation (bry) (together with its subsidiaries, “Berry”), we operate under a philosophy that focuses on integrity, compliance and doing the right thing. It is the ongoing duty and responsibility of every Berry director, officer and employee to live by Berry’s core values and protect the company’s reputation at all times. This means that we avoid even the appearance of improper conduct. This commitment is further detailed in our Code of Conduct (available on our website at <https://bry.com/sustainability/governance/>). We expect the same of our business partners.

Suppliers and contractors play a vital role in Berry’s success and we rely heavily on them to help us conduct our business, live our values, and create value for our stockholders. We are committed to the highest ethical standards in selecting and working with our suppliers and contractors. This Supplier Code of Conduct outlines the expectations we have for the suppliers and contractors with whom we partner. We do not make compromises in these areas and we expect our suppliers and contractors to always adhere to the letter, spirit and intent of these expectations and values.

The Supplier Code of Conduct provides the foundation for our procurement policies, guidelines and practices, as well as our ongoing evaluation of Berry’s suppliers and contractors and constitutes additional terms of your contract with Berry. This Supplier Code of Conduct, as well as our procurement policies, guidelines and practices, may be amended at any time in the sole discretion of Berry.

Obey the Law

We expect all of our suppliers and contractors to know and fully follow the applicable laws, rules and regulations where they operate, including but not limited to those regarding environmental, health and safety, employment and human rights matters.

Treat People with Dignity and Respect

Suppliers and contractors must treat their employees with dignity and respect and ensure that their employees are appropriately compensated with wages, working hours, overtime and benefits that meet or exceed legally mandated minimum standards.

Berry recognizes and respects the freedom of employees to exercise their lawful rights of free association and collective bargaining. The right to freedom of association, to bargain collectively and all other workplace rights of employees must be respected by suppliers and contractors.

Suppliers and contractors are expected to provide their employees with a safe and healthy working environment free from discrimination or harassment based on a person’s race, color, ethnicity, national origin, ancestry, citizenship status, sex, gender identity and/or expression, sexual orientation, mental disability, physical disability, medical condition (as defined by applicable law), neuro(a)typicality, physical appearance, genetic information, age, parental status or pregnancy, marital status, religion, creed, political affiliation, military or veteran status, socioeconomic status or background. To best meet these expectations, suppliers and contractors should have formal policies that prohibit harassment and discrimination and should periodically review hiring and promotion practices to ensure fair treatment of all employees.

Berry supports internationally recognized human rights and we will comply with all applicable laws regarding the treatment of our employees and other stakeholders. We insist that our suppliers and contractors also uphold these principles.

Further, suppliers and contractors must not engage in any practice that constitutes child labor, forced labor, (including, without limitation, prison labor, bonded labor and indentured labor) or trafficking in persons. Suppliers and contractors must not use corporal punishment, physical or psychological abuse, threats of violence, or other forms of physical or mental coercion.

Avoid Conflict of Interests

Suppliers and contractors must do business in a way that is open, transparent and with the highest integrity. All business decisions should be impartial and based on sound business reasoning and the best interest of Berry's stakeholders.

There is the potential for a conflict of interest if a supplier's employee or contractor, or his or her family member, has a close relationship with a Berry employee who can make decisions that will affect the supplier's business. For that reason, suppliers and contractors must promptly disclose these types of relationships to Berry before entering into negotiations and whenever potential conflicts arise. While suppliers and contractors are required to promptly notify Berry when they become aware of any relationship that could be a conflict, suppliers and contractors will be required from time to time to represent to Berry if any of its employees or contractors, or its employees' / contractors' family members, have any kind of past or present personal or business relationship with Berry or any of Berry's directors, officers or employees. To better ensure that such notifications occur timely, suppliers should have policies regarding conflicts arising from personal relationships.

To avoid a conflict of interest, suppliers and contractors are prohibited from entering into any business relationship with any director, officer or employee of Berry without prior written consent from Berry.

A familial or intimate relationship between and among Berry employees and a supplier's employees and contractors can create an actual or a potential conflict of interest in the employment setting, especially where one supervises the other. To avoid this problem, Berry may refuse services provided by a supplier's employees and contractors who are party to any type of familial or intimate personal relationship with each other or with a Berry director, officer or employee. Suppliers are expected to manage their employees and contractors to ensure they are not in a position with Berry where the potential for favoritism or conflict exists.

To avoid a conflict of interest, Berry's directors, officers and employees are prohibited from giving or receiving gifts or entertainment of anything more than nominal value provided as a courtesy and for a legitimate business purpose, or cash or cash equivalents in any amount. Accordingly, we require our suppliers and contractors to refrain from giving to or receiving from any Berry director, officer or employee any gift, entertainment or other favor of more than nominal value, including any commission, fee or rebate. Suppliers and contractors are required to promptly notify Berry if a Berry director, officer or employee ever requests or demands a business courtesy.

Maintain the Highest Safety, Health and Environment Standards

Berry is committed to maintaining the safety and health of people and the quality of the environment where we operate and complying with the letter and spirit of all environmental, health and safety laws and regulations.

It is important that suppliers and contractors manage compliance, minimize environmental impact and drive continual improvement of environmental, health and safety compliance and practices.

We all have the responsibility to stop work – or not start work – if hazards or risks could pose a threat to health, safety or the environment.

Protect Berry Information

Berry's employees, as well as each supplier's employees and contractors, are responsible for safeguarding Berry's confidential and proprietary information. Berry's confidential and proprietary information should not be used for any purpose except to advance Berry's business. Our employees, as well as each supplier's employees and contractors, should use extreme care in protecting all types of sensitive information. Confidential information should not be stored in unauthorized locations, such as personal email servers or an employee's private electronic device, without proper approval.

Do Business with Integrity

Suppliers and contractors are required to observe Berry's procurement policies, guidelines and practices, as established by Berry's Supply Chain Management Department and Legal Department. Among other requirements, procurement agreements (including any supplement, addendum or amendment thereto) should be written to clearly identify the services or products to be provided, the basis for payment and the applicable price.

Contractors and suppliers should be aware that Berry employees may only execute agreements arranged for, written by, and/or approved by Berry's Supply Chain Management Department and/or Legal Department. Employees are prohibited from authorizing changes to any contractual agreement terms unless approval to do such is granted by the Company's Supply Chain Management Department and/or Legal Department pursuant to Berry's procurement and contract protocols. If you have any questions as to whether an employee has the authority to enter into a contract, including any modifications, renewals, amendments or supplements, please contact legal@bry.com.

Berry will contract with each of its suppliers and contractors only on the basis of quality, price, service and other valid business criteria. The price must not be excessive in light of industry practice and must be commensurate with the services or products provided.

The fact that a supplier or potential supplier may also be a customer of Berry will not be the determining factor for making purchasing decisions. No employee may condition purchases from a supplier or contractor on the supplier's patronage with Berry, nor shall any employee attempt to persuade suppliers to purchase from Berry simply because Berry buys from them.

Report Concerns

Berry is committed to appropriate conduct by its employees, suppliers, contractors and agents and requires questionable conduct to be reported. This may include, for example, violations of the Berry Code of Conduct, company policies, and/or applicable laws, rules or regulations. All of a supplier's employees and contractors should be encouraged to report concerns or illegal or otherwise inappropriate activities in a Berry workplace or when conducting business with Berry without threat of reprisal, intimidation or harassment.

If you are aware, or suspect, that one of our employees, suppliers, contractors or agents is acting inappropriately, we ask that you inform a member of Berry management, Berry's General Counsel (legal@bry.com), or use the Berry Hotline, which provides a direct, effective and risk-free way to report such suspected violations:

- www.berrypetroleum.ethicspoint.com
- Call (844) 836-0245

We are committed to consistently looking into all potential breaches or questions that are raised, and we will deal with them fairly and responsibly.