

CODE OF BUSINESS CONDUCT AND ETHICS
FOR
DIRECTORS, OFFICERS AND EMPLOYEES

The current EOG Resources, Inc.
Code of Business Conduct and Ethics for Directors, Officers and Employees
(the "Code") is set forth on the following pages.

Notice of Amendments

On May 22, 2025, the Board of Directors of EOG Resources, Inc. ("EOG"), as part of its regular review of corporate governance matters, approved certain revisions to the Code, including the following amendments:

- Amendment to Section 10 (Confidentiality) to confirm that the confidentiality provisions do not prohibit legally protected communications.

- Amendment to Section 15 (Competition and Fair Dealing) to provide (consistent with Section 17) that providing gifts or entertainment to government employees is generally restricted under U.S. law and the laws of countries where EOG does business.

- Amendments to Section 16 (Insider Trading) to (1) confirm (consistent with EOG's Insider Trading Policy) that provisions regarding material, non-public information apply to trading in securities of companies with which EOG does business and (2) provide location of EOG's Insider Trading Policy on EOG's intranet.

The foregoing amendments to the Code did not constitute or effect a waiver of application of any provision of the Code to any of the Company's directors, executive officers or other employees.

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Introduction; EOG Values

> "EOG's reputation is a valuable asset of our company. Every employee, vendor and contractor is accountable for our global ethics and compliance program to maintain EOG's reputation." – *Ezra Yacob, Chief Executive Officer, EOG Resources, Inc.*

Accordingly, it is the policy of EOG Resources, Inc. and its subsidiaries (together, "EOG" or the "Company") that the conduct of every director, officer and employee, while acting on behalf of the Company, shall be based upon the highest ethical standards and compliance with the law. This Code of Business Conduct and Ethics ("Code") covers a wide range of business practices and procedures. It does not cover every issue that may arise, but it sets out basic principles to guide all directors, officers and employees of the Company.

EOG is committed to being a responsible corporate citizen. This Code is an integral part of that commitment. We expect our directors, officers and employees to comply with both the letter and spirit of the Code and seek to avoid even the appearance of improper behavior. We want to maintain our reputation in the industry and protect our culture. With that in mind, we also expect all EOG managers to lead by example and demonstrate their support for this Code through their actions as well as their words.

In addition to the Code, the Company has other policies and procedures that apply to its directors, officers and employees. These other policies and procedures, together with training materials and guidelines, are also designed to promote ethical conduct and compliance with the law and are available on the Company intranet or from the General Counsel and Chief Compliance Officer or the Human Resources Department. You are expected to be familiar with the laws, policies and procedures that apply to your role. If you have questions, ask your supervisor or contact the Legal Department.

Those who violate the standards in this Code will be subject to disciplinary action, which may include termination of employment. ***If you become aware of a situation that you believe may violate this Code, you should report your concerns immediately in accordance with the procedures described in Section 3 of this Code.*** No adverse action will be taken against an employee for making a complaint or disclosing information in good faith, and any officer or employee who retaliates in any way against an employee who in good faith reports any violation or suspected violation of this Code will be subject to disciplinary action, which may include termination of employment.

1. Compliance with Laws, Rules and Regulations

Obeying the law, both in letter and in spirit, is the foundation on which the Company's ethical standards are built. All directors, officers and employees must respect and obey the laws of the cities, counties, states and countries in which we operate. Although not everyone is expected to know the details of these laws, it is important to know enough to determine when to seek advice from supervisors, managers or other appropriate personnel.

If you are uncertain as to whether a course of action is in compliance with the law, you should ask for guidance from the Legal Department.

2. Waivers of the Code of Business Conduct and Ethics

Any waiver of this Code for executive officers or directors may be made only by the Board of Directors or a Board committee and will be promptly disclosed if required by law or stock exchange rules. Only the Company's Chief Executive Officer may waive provisions of this Code for other employees of the Company.

3. Seeking Guidance and Reporting Procedures

EOG directors, officers and employees have the responsibility to report violations of this Code or other conduct relating to EOG's business that they suspect may be unethical or in violation of applicable laws and regulations. Reporting actual or suspected misconduct allows EOG to investigate potential problems, stop actual misconduct and prevent future issues.

To report a suspected violation or unethical conduct or when in doubt about the best course of action in a particular situation:

- Talk with your supervisor, his or her supervisor, your Human Resources representative or any member of the Legal Department; or

- Talk to a member of the Compliance Committee (General Counsel; Chief Financial Officer; Chief Human Resources Officer; or Vice President, Audit) or any of the officers and directors of the Company whose contact information is found on the "Compliance and Ethics" section of the Company intranet; or

- See http://www.eogresources.ethicspoint.com to submit a confidential report by telephone or online.

Non-Retaliation. **The Company will not take adverse action or otherwise allow retaliation against any employee who in good faith reports a suspected violation of the Code or suspected unethical or illegal conduct.** Any officer or employee who retaliates in any way against an employee who in good faith reports a violation or suspected violation of this Code or suspected unethical or illegal conduct will be subject to disciplinary action, which may include termination of employment and may include criminal prosecution.

Audit Committee Review. The Audit Committee of the Board of Directors receives regular reports about Code compliance and also directly reviews concerns regarding accounting, internal controls and auditing matters that are reported to a member of the Compliance Committee or submitted confidentially by telephone or online. Additionally, individuals may report their concerns directly to the Audit Committee. Concerns reported directly to the Audit Committee should be marked "Confidential" and addressed to the Chairperson of the Audit Committee, c/o General Counsel, EOG Resources, Inc., 1111 Bagby, Sky Lobby 2, Houston, TX 77002.

Communications with the Board. The Board of Directors has also adopted procedures by which stockholders or other interested parties may communicate with the Board on any matter. These communications may be submitted in writing, addressed to the intended recipient or recipients, in care of the Corporate Secretary, EOG Resources, Inc., 1111 Bagby, Sky Lobby 2, Houston, TX 77002. The Corporate Secretary will log the communication and forward to the director(s) to whom it is addressed. Any communications marked "Confidential" will be forwarded unopened.

4. Fair Treatment and Mutual Respect

The diversity of the Company's employees is a tremendous asset. EOG policies are designed to ensure that all employees are treated fairly and with respect, by the Company and each other. We will hire, evaluate, transfer, compensate and promote employees based on skills and performance, not on unlawful considerations. We are firmly committed to providing equal opportunity in all aspects of employment and a workplace free of discrimination, harassment or segregation based on sex, race, color, age, religion, national origin, physical or mental disability, pregnancy (including childbirth and related medical conditions), protected Veteran status, genetic information, sexual orientation, gender identity or any other characteristic protected by law. This includes providing reasonable accommodation for employees' disabilities or religious beliefs or practices. Similarly, offensive or hostile working conditions created by such discrimination, harassment or segregation will not be tolerated. Any employee who engages in discrimination or harassment will be subject to disciplinary action, up to and including termination of employment.

If you feel that you have experienced or observed any discriminatory or harassing behavior, you are encouraged to voice your concerns. Tell your supervisor or your Human Resources representative or report your concerns in accordance with the procedures described in Section 3 of this Code. Retaliation against an employee who lodges a complaint in good faith, or participates in the investigation of a complaint, will not be tolerated.

5. Human Rights

While governments bear the primary responsibility for protecting human rights, the Company is committed to conducting our business in a manner that respects the dignity and human rights of all individuals. The Company will comply with local laws regarding human rights where we operate. EOG also endeavors to complement local laws with internationally recognized human rights principles and frameworks. Employees and officers are expected to demonstrate respect for the human rights of all Company stakeholders. If you become aware of a situation that might result in a violation of human rights related to EOG's operations, including in our business dealings with vendors, contractors and business partners, immediately report the matter to your Human Resources representative or any member of the Legal Department or report your concerns in accordance with the procedures described in Section 3 of this Code.

6. Workplace Safety, Security and Protection of the Environment

The Company strives to provide each employee with a safe and healthy work environment. Each employee has responsibility for maintaining a safe, secure and healthy workplace for all employees by following safety and health rules and practices and reporting accidents, injuries and

unsafe equipment, practices or conditions. If you become aware of any threat to safety, respond as you believe appropriate and report it immediately to your supervisor, your Human Resources representative or a Safety Manager, or in accordance with the procedures described in Section 3 of this Code.

Violence and threatening behavior are not permitted. Firearms and other weapons are strictly prohibited on Company property or on the person of an employee while conducting Company business, unless authorized in writing for special circumstances by the Chief Human Resources Officer. Any acts or threats of violence should be reported immediately to your supervisor, your Human Resources representative or a Safety Manager, or in accordance with the procedures described in Section 3 of this Code.

Employees should report to work in condition to perform their duties, free from the influence of drugs or alcohol. The use, possession or distribution of illegal or unauthorized drugs or alcohol on Company time or on Company premises will not be tolerated.

The Company is committed to safeguarding the environment and conducting our 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.

7. Conflicts of Interest, Outside Business Activities and Related Party Transactions

All directors, officers and employees have the responsibility to ensure that business decisions are based solely on what is best for the Company and are not improperly influenced by personal or family interests. A "conflict of interest" exists when a person's private or family interest interferes, or appears to interfere, in any way with the interests of the Company or makes it difficult for a person to perform his or her Company work objectively and effectively. Conflicts of interest may also arise when an employee, officer or director, or a member of his or her family, receives improper personal benefits as a result of his or her position or relationship with Company.

Conflicts of interest are prohibited as a matter of Company policy. No EOG director, officer or employee shall knowingly allow himself or herself to become involved in a conflict of interest or, upon discovery thereof, allow such a conflict to continue. A potential conflict of interest or the appearance of a conflict of interest, if disclosed and approved in writing by the Chief Executive Officer or General Counsel, may be dealt with in a way that prevents it from becoming an actual conflict that would be detrimental to EOG.

Actions or situations that might involve a conflict of interest, or the appearance of one, should be fully disclosed and include the following:

- Working for vendors, contractors, customers or competitors. It is almost always a conflict of interest for a Company employee to work simultaneously for a vendor, contractor, customer or competitor. You are not allowed to work for a competitor as a consultant or board member. The best policy is to avoid any direct or indirect business relationship with our vendors, contractors, customers or competitors, except on the Company's behalf.

- Employment of family members by vendors, contractors, customers or competitors. It is important to disclose under this Code if any members of your family are employed by

vendors, contractors, customers or competitors of EOG. Depending on the circumstances, it may be necessary for EOG to implement procedures to avoid an actual or potential conflict of interest or the appearance of a conflict.

- Employment of family members or household members by EOG. It is also important to disclose under this Code if any member of your family or your household (such as a roommate) is employed with, or is being considered for employment with, EOG. Depending on the circumstances, it may be necessary for EOG to implement procedures to avoid an actual or potential conflict of interest or the appearance of a conflict.

- Financial interest in vendors, contractors, customers or competitors. Ownership by an employee or, to the employee's knowledge, by a member of the employee's family of a financial interest in any outside enterprise which does or seeks to do business with, or is a competitor of, the Company. This provision does not apply to the ownership of the securities of a publicly traded entity as long as such ownership represents less than five percent (5%) of the entity's outstanding securities.

- Holding interests in oil and natural gas leases or royalties. Interests held by the employee or any family member, including interests acquired as an inheritance or gift, particularly (but not limited to) instances in which EOG is the operator of the lease or well(s).

- Gifts, entertainment and other benefits. Soliciting, accepting or retaining any gift, entertainment, trip, loan, discount, guarantee of an obligation, service or other benefit from any organization or person doing (or seeking to do) business with the Company or competing with the Company is prohibited, other than (i) modest, non-cash gifts or entertainment as part of normal business courtesy and hospitality that would not influence, or reasonably appear to influence, a director, officer or employee to act in any manner not in the best interest of the Company or (ii) acceptance of a nominal non-cash benefit that has been disclosed and approved by EOG. It is not a conflict of interest for a director, officer or employee or members of their family to obtain services from persons or entities who also provide services to the Company, including legal, accounting or brokerage services, loans from banks or insurance from insurance companies, at rates customary for similarly situated customers.

- Acting as a broker or intermediary. Acting as a broker, finder, go-between or other intermediary for the benefit of a third party in transactions involving or potentially involving EOG.

- Decisions involving an undisclosed personal benefit. A director, officer or employee exercising discretionary authority or making or influencing any recommendation or decision on behalf of EOG that would result in an undisclosed personal financial benefit to such director, officer or employee or to members of his or her family.

Conflicts of interest may not always be clear-cut, so if you have a question, you should consult with higher levels of management or the Company's Legal Department. Any employee, officer or director who becomes aware of a conflict or potential conflict should bring it to the attention of their supervisor or Human Resources representative or any of the other points of

contact described in Section 3 of this Code. EOG may put procedures or controls in place to prevent a potential conflict of interest or appearance of a conflict of interest from becoming an actual conflict of interest that could be detrimental to EOG.

If a relationship or action involving or benefiting an employee or non-executive officer or a member of his or her family is disclosed to and affirmatively determined by the Company's Chief Executive Officer or General Counsel to be immaterial, or if a relationship or action involving or benefiting an executive officer or director or a member of his or her family is disclosed to and affirmatively determined by the Board of Directors or a Board committee to be immaterial, then it is not deemed to be a conflict of interest within the meaning of this Code.

Outside Business Activities. Each officer and employee is expected to devote his or her full time and efforts during normal working hours to the service of the Company. No officer or employee shall engage in any business or secondary employment that interferes with his or her obligations and responsibilities to the Company. Outside work must not be done on Company time and must not involve the use of Company resources. You should promptly disclose any outside employment and any businesses that you operate to the attention of your supervisor or Human Resources representative, or any of the other points of contact described in Section 3 of this Code.

Service on Boards. Officers and employees of the Company should inform the Chief Human Resources Officer or the General Counsel prior to accepting appointments to the board of directors of any public or privately held for-profit company so that disclosure requirements and possible conflict of interest issues can be analyzed and discussed. It is not necessary to disclose service on the boards of nonprofit, charitable, religious, civic or educational organizations unless it interferes with your obligations and responsibilities to the Company.

Related Party Transactions. A "related party transaction" is a transaction involving the Company (including its subsidiaries) in which any director or executive officer (or certain of their family members) had or will have a direct or indirect material interest. Although not all related party transactions involve conflicts of interests, such transactions may trigger certain legal obligations, including public disclosure. Therefore, all directors and executive officers shall promptly notify the General Counsel and, in the case of directors, shall also notify the Chairperson of the Audit Committee of the Board of Directors, of any transaction that may constitute a related party transaction.

Loans by the Company. Loans by the Company to, or guarantees by the Company of obligations of, employees or their family members are of special concern and could constitute improper personal benefits to the recipients of such loans or guarantees, depending on the facts and circumstances. Loans by the Company to, or guarantees by the Company of obligations of, any director or officer or their family members are expressly prohibited.

8. Corporate Opportunities

Employees, officers and directors may not use their position with the Company or Company property or information for improper personal gain, or to compete with the Company directly or indirectly. In addition, employees, officers and directors are prohibited from taking for

themselves personally or for a family member opportunities that are discovered through their position with the Company or the use of Company property or information, unless such opportunity is first disclosed and offered to the Company and the Company affirmatively decides not to pursue it. Such disclosure should be made in writing to the Chief Executive Officer or, if the corporate opportunity involves the Chief Executive Officer, to the Board of Directors or a Board committee. Employees, officers and directors owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises.

9. Business Records and Disclosures

Business Records. The Company requires honest and accurate recording and reporting of business information and the management of business records in accordance with legal requirements. Unrecorded or "off the books" funds, assets or transactions shall not be maintained. All of the Company's business records, including accounts and financial statements, must be maintained in reasonable detail, must appropriately reflect the Company's transactions and must conform both to applicable legal requirements and to the Company's system of internal controls. Records should always be retained or destroyed according to the Company's records management policies. Records can exist in both physical and electronic form and include, but are not limited to, documents, files, emails, graphs, databases, maps, charts, memos, pictures, videos, audio recordings, voice mails, etc., as well as data on mobile devices.

Public Disclosures. All public disclosures made by the Company, including disclosures in reports and documents filed with or submitted to the United States Securities and Exchange Commission ("SEC"), shall be accurate and complete in all material respects and comply with all applicable federal securities laws and SEC rules. Each director, officer and employee is expected to carefully consider all inquiries from the Company related to the Company's public disclosure requirements and promptly supply complete and accurate responses.

Any employee, officer or director who becomes aware or believes that any disclosure that the Company has made or intends to make is inaccurate or misleading should immediately contact the Company's Chief Financial Officer or General Counsel.

Communicating with the Public. Communications to those outside the Company requires an understanding of legal and media issues. Special care is required regarding the public release of information concerning the Company's business, strategies, activities and plans, the disclosure of which could influence investors trading in the Company's securities. All media contact and public statements and discussions of Company business should be referred to the Company's Investor Relations Department. Employees and other representatives may not speak on behalf of the Company unless properly authorized in accordance with Company policy.

10. Confidentiality

Employees, officers and directors must maintain the confidentiality of all confidential or proprietary information entrusted to them by the Company or others with whom the Company does business, except when disclosure is authorized by the Legal Department, required by laws or regulations or when the individual is exercising legally protected rights to communicate with government agencies or other parties. Confidential information includes all non-public

information that, if disclosed, might be of use to competitors, or harmful to the Company or others with whom the Company does business. It also includes non-public or otherwise private information that vendors, customers, other companies and other parties (such as royalty interest owners and job applicants) have entrusted to us. Proprietary information includes seismic, geological and geophysical data, prospect and trend information, intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as exploration, production and marketing plans, engineering and manufacturing ideas, designs, databases, records, salary information and any unpublished financial data and reports. Unauthorized use or distribution of this information is a violation of Company policy, could be detrimental to the Company and could also be illegal and result in civil or criminal penalties. Such information is to be used solely for Company purposes and never for the private gain of a director, officer or employee (or any member of his or her family), or any third party.

In addition, employees, officers and directors should use caution when discussing confidential or proprietary EOG information in a public place where they may be overheard, and should refrain from disclosing confidential or proprietary EOG information on the internet, including social media and networking sites, message boards, blogs and non-EOG email systems. The obligation to preserve and protect confidential or proprietary information continues even after employment (or Board service, in the case of a director) ends.

11. Social Media

EOG recognizes that the use of social media provides unique opportunities to participate in interactive discussions and share information on particular topics. However, employees' use of social media can pose risks to EOG's confidential and proprietary information and reputation, can expose the Company to legal claims, and can jeopardize the Company's compliance with business rules and laws.

To minimize these business and legal risks, to avoid loss of productivity and distraction from employees' job performance, and to ensure that the Company's information systems and communications systems are used appropriately, EOG expects its employees to never use social media in a way that violates Company policies or employee obligations. This policy is not intended to restrict communications or actions protected or required by state or federal law.

12. Protection and Proper Use of Company Assets; Cybersecurity

Company assets should be used only for the legitimate business purposes of the Company. All employees, officers and directors should endeavor to protect the Company's assets and ensure their proper and efficient use. Protecting Company assets against loss, theft and misuse is every employee and director's responsibility. Company assets include not only cash and other financial assets, but also tangible assets such as buildings, tools, vehicles, equipment, computers, copiers and office supplies as well as EOG's proprietary information and intellectual property, such as proprietary equipment and processes and computer applications and programs. If you become aware of the theft or misuse of Company assets, including EOG's proprietary information or intellectual property, immediately report the matter to your supervisor, his or her supervisor or the General Counsel, or in accordance with the procedures described in Section 3 of this Code, for investigation.

With regards to EOG's information systems specifically, EOG, as part of its cybersecurity procedures, employs a combination of people, processes and technology to protect the confidentiality, integrity and availability of EOG's systems and the confidential and proprietary information contained thereon. However, even with these systems of security controls, employees must still remain vigilant and guard against breaches and intrusions.

Accordingly, all EOG employees and officers should endeavor to safeguard EOG's information systems and related technologies from theft, fraud, unauthorized access, alteration or other damage. In addition, employees and officers must avoid any usage of EOG's systems that might lead to loss or damage, such as a leak of confidential or proprietary company information or a breach of EOG's information systems security.

If you become aware of a situation that might compromise EOG's information systems security – for example, an active or attempted breach of any of EOG's systems or a lost or stolen password, computer or mobile device – immediately contact a member of EOG's Information Systems team.

13. Data Privacy

EOG is committed to protecting the personal information of others (such as royalty interest owners, employees and job applicants) in its control and ensuring that it will only be used for appropriate business purposes. Access to, and use of, such personal information is limited to those who have appropriate authorization and a valid business reason to know such information. Further, those who collect, access, use or disclose such personal information have a responsibility to do so ethically and consistent with, and subject to, all legal and regulatory requirements. Accordingly, all EOG employees are prohibited from (i) sharing the personal information of others obtained from EOG and/or EOG's information systems without express authorization from EOG or (ii) using such information for anything other than EOG's legitimate business purposes.

14. Intellectual Property

As discussed above, employees and officers should endeavor to protect the Company's assets against loss, theft and misuse and maintain the confidentiality of proprietary information entrusted to them by the Company. Such assets and proprietary information include the Company's intellectual property – that is, anything created by an employee or officer on Company time, at EOG's expense or within the scope of the individual's job duties. Examples include proprietary equipment and processes, improvements and computer applications and programs.

Any intellectual property created by an employee or officer in the course of employment with EOG belongs to, and will be the sole property of, EOG. This is true, regardless of whether such property can be patented or protected by copyright, trade secret or trademark.

15. Competition and Fair Dealing

We seek to outperform our competition fairly, honestly and in full compliance with applicable laws, including antitrust laws. We seek competitive advantages through superior performance, never through unethical or illegal business practices. Each employee, officer and director should respect the rights of, and deal fairly and honestly with, the Company's customers,

vendors, contractors, competitors, employees and anyone else with whom he or she has contact in the course of performing his or her job. No employee, officer or director should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair-dealing practice.

Antitrust Laws. Antitrust laws, also known as competition laws outside the United States, are designed to ensure a fair and competitive free market system. We will comply with the applicable antitrust and competition laws wherever we do business. Some of the most serious antitrust offenses occur between competitors, such as agreements to fix prices, bid rigging, joint bidding and tying arrangements. Therefore, it is important to avoid discussions with competitors regarding pricing, terms and conditions, costs, marketing or production plans and any other proprietary or confidential information. Antitrust laws may also apply in circumstances such as benchmarking efforts, trade association meetings or strategic alliances among competitors. If you believe a conversation with a competitor enters an inappropriate area, end the conversation immediately and consult the Legal Department.

Unauthorized Taking or Use of Information. The unauthorized taking or use of proprietary information from other companies, possessing trade secret information that was obtained without legal authority, or inducing such disclosures by past or present employees of other companies is prohibited as a matter of Company policy and may be illegal.

Providing Business Entertainment or Gifts. The purpose of providing business entertainment and gifts in a commercial setting is to create goodwill and sound working relationships, not to gain an unfair advantage. No gift or entertainment should ever be offered, given or provided to vendors, contractors, customers or competitors of EOG by any Company employee, officer or director, or by any of their family members, unless it: (i) is not a cash gift, (ii) is consistent with customary business practices, (iii) is not excessive in value, (iv) cannot be construed as a bribe, "kickback" or payoff and (v) does not violate any laws or regulations. In addition, as further discussed in Section 17 of this Code, providing business gifts and entertainment to government employees or officials is generally restricted under U.S. law and the laws of the countries where the Company or Company representatives conduct EOG business. Discuss with your supervisor or the Company's Legal Department any gifts or proposed gifts if you are uncertain whether they are appropriate.

16. Insider Trading

Directors, officers or employees in possession of material information about the Company must abstain from trading in EOG securities until such information is made generally and publicly available by means of a press release or other public filing or disclosure by the Company. Information is considered material if it might be considered important to an investor in deciding whether to buy, sell or hold EOG securities. Such material "inside information" might include earnings information, information regarding stock and dividend activity, changes of control or management, pending mergers, sales or acquisitions, reserve discoveries or other significant business information or developments. Providing such inside information to others who then trade on it is also strictly prohibited. Trading on inside information and "tipping" such information to others who trade on such information are also violations of federal securities law. If you have any questions, please consult the Company's Legal Department.

In addition, directors, officers and employees, in the course of their EOG duties, may come into possession of material, non-public information concerning another publicly traded company because that company is doing business with EOG as a customer, supplier, or vendor or is otherwise engaged in an actual or potential transaction with EOG. Under EOG's Insider Trading Policy, until such information has been publicly disclosed or is no longer material (for example, because a potential transaction did not close), you cannot trade in the securities of such other company and must not advise anyone else to trade in the securities of such other company.

For additional guidance, see EOG's Insider Trading Policy, which can be found in the "Policies & Programs" section of the Company intranet.

17. International Business Transactions

Certain provisions of United States law and the laws of other countries where the Company or Company representatives conduct EOG business govern EOG's international activities. All transactions on behalf of EOG shall be carried out in full compliance with those laws so long as they are in compliance with the laws of the United States. Such laws and regulations can be complex and subject to certain exceptions, and so employees are encouraged to contact EOG's Legal Department with any questions or for guidance in a particular situation.

Anti-Corruption. EOG policy prohibits bribery in any form, defined as providing or receiving any payments or other things of value in order to gain or maintain business in a corrupt manner or to obtain an improper business advantage. In addition, certain laws of the United States and the other countries where the Company or Company representatives conduct EOG business, including the U.S. Foreign Corrupt Practices Act (the "FCPA"), prohibit corruptly giving anything of value, directly or indirectly, to officials of foreign governments, employees of public international organizations, or foreign political party officials or candidates in order to obtain or retain business. Under the FCPA, a foreign official is broadly defined to include an official or employee of a foreign government or its agencies or government-controlled enterprises, including some national oil companies. The FCPA applies not only to EOG's directors, officers and employees, but also to consultants or other persons we retain to represent us in any country outside the U.S. The FCPA also requires that we maintain a system of internal accounting controls and keep accurate books and records. The FCPA makes it illegal for any person to circumvent the Company's internal controls or to falsify its books and records (or any supporting documentation such as invoices) to disguise payments prohibited by the FCPA or for any other purpose. The Company will provide ongoing FCPA and anti-corruption compliance training for those employees whose work may involve international activities or contact with foreign government officials.

Anti-Money Laundering Laws. EOG prohibits the movement of cash or other monetary instruments ("funds" or "cash") in any situation in which EOG, or an employee or agent of EOG, is aware or has reason to know that such funds are the proceeds of unlawful activity or that the transfer of those funds is intended to disguise the source of the funds. While acting on our behalf, we expect all EOG employees to not knowingly engage or attempt to engage in any transaction involving proceeds derived from unlawful activity.

Anti-Boycott Laws. A boycott is the refusal of a person or group of people to do business with certain other people or countries. United States anti-boycott laws generally prohibit U.S.

companies and their subsidiaries from cooperating with international boycotts that the U.S. government does not sanction. U.S. companies and their worldwide subsidiaries also must report to the U.S. government any requests they receive to engage in boycotting activity. If you receive a request related to a foreign boycott that is not supported by the U.S. government, you must immediately report the request to the General Counsel or in accordance with the procedures described in Section 3 of this Code. EOG will comply with all anti-boycott laws of the United States.

Economic and Trade Sanctions. EOG complies with all U.S. import and export controls and economic sanctions and embargoes restricting U.S. persons, corporations and, in some cases, foreign subsidiaries, from doing business with certain countries, groups, and individuals. Economic sanctions may prohibit doing business of any kind with targeted governments and organizations, as well as individuals and entities that act on their behalf. U.S. laws and regulations also may restrict investment in a targeted country, as well as trading in goods, technology, and services with a targeted country. Further, U.S. persons may not approve or facilitate transactions by a third party that the U.S. person could not do directly. Please consult with the Legal Department for further guidance.

Export Controls. All EOG employees must take steps to ensure that EOG complies with U.S. and any other applicable export control laws, including confirming the export control jurisdiction and classification of the goods, services, technology and software to be exported, re-exported or transferred and obtaining any necessary export licenses. Questions or concerns about a proposed export, re-export or in-country transfer should be directed to the Legal Department, which will provide assistance in determining whether an export license is required and in obtaining any required licenses.

18. Political Activities and Campaign Contributions

EOG respects and supports the rights of directors, officers and employees to participate in political activities. However, these individuals must at all times make clear that their views and actions are their own, and not those of the Company. In addition, while directors, officers and employees may support political parties and candidates with their personal efforts and contributions, they may not make any contribution of Company funds, property or services to any political party or committee, or to any candidate for, or holder of, any office of any government without the express approval of the Chief Executive Officer. These restrictions also include use of Company resources, such as employee time, telephones, computers or supplies. The Company will not reimburse employees for personal political contributions.

Lobbying activities on behalf of the Company are permissible, but highly regulated by law. Employees who wish to communicate with elected officials and government employees on state and national issues relating to EOG's business should contact the Legal Department to ensure that such activities fully comply with the law and that the Company's lobbying efforts are coordinated.

In addition, the U.S. government has a number of laws and regulations regarding business gratuities which may be accepted by U.S. government personnel. State and local governments, as well as foreign governments, may have similar rules. The Company's Legal Department can provide guidance to you in this area.

The Nominating, Governance and Sustainability Committee of the Board of Directors shall review, at least annually, the Company's contributions to trade associations, including any amounts related to political activities and lobbying expenses, and review other political contributions or expenditures, if any, by the Company. The Committee will also periodically review the Company's policies relating to the approval of, and use of corporate funds or property for, contributions to trade associations (including any amounts related to political activities and lobbying expenses) and other political contributions or expenditures.