

Natural Gas Services Group, Inc.
Whistleblower Policy

Adopted March 13, 2026

I. Introduction.

Natural Gas Services Group, Inc. (the “**Company**”), has adopted a Code of Ethics and Business Conduct (“**Code of Ethics**”) applicable to all employees that urges employees promptly to discuss with or disclose events of questionable, dishonest, fraudulent, or illegal nature.

The Company is committed to full and accurate financial disclosure and to maintaining its books and records in compliance with all applicable laws, rules, and regulations. The Company wishes to encourage any director, officer or employee to make the Company aware of any practices, procedures, or circumstances that raise concerns about the integrity of its financial disclosures, books, and records. As an additional measure to support our commitment to ethical conduct, the Audit Committee of the Company’s Board of Directors has adopted the following policies and procedures for (i) the receipt, retention, and treatment of complaints received by the Company regarding accounting, internal controls, or auditing matters; and (ii) to protect the confidential, anonymous submission by employees of the Company of concerns regarding questionable accounting or auditing matters.

For purposes of this policy, a “**Compliance Complaint**” is a complaint about accounting, internal accounting controls, auditing matters, or questionable financial practices, including but not limited to complaints of:

- fraud against investors, securities fraud, mail or wire fraud, bank fraud, or fraudulent statements to the Securities and Exchange Commission (the “**SEC**”) or the investing public;
- violations of SEC rules and regulations or any other laws applicable to the Company’s financial accounting, maintenance of financial books and records, internal accounting controls, and financial statement reviews or audits;
- fraud or deliberate error in the preparation, evaluation, review, or audit of any financial statement of the Company;
- significant deficiencies in or intentional noncompliance with the Company’s internal accounting controls;
- misrepresentations or false statements regarding a matter contained in the financial records, financial reports, or audit reports of the Company; and
- deviation from the full and fair reporting of the Company’s financial condition.

II. Compliance Officer.

We have designated a compliance officer (“**Compliance Officer**”) who is responsible for administering this policy. Our current Compliance Officer with respect to this policy is the Director of Internal Audit. The Compliance Officer is responsible for receiving, collecting, reviewing, processing, and resolving concerns and reports by employees and others on the matters described above and other similar matters. Employees are encouraged to discuss issues and concerns of the type covered by this policy with their supervisor, who is in turn responsible for informing the Compliance Officer of any concerns raised. If the employee prefers not to discuss these sensitive matters with his or her own supervisor, the employee may instead discuss such matters with a higher-level manager, the Chief Financial Officer, or the Compliance Officer. If you are uncomfortable speaking with one of the above-noted contacts, or you do not feel your concern is being adequately addressed, you may report your concern using one of the methods listed in Section III below. The Compliance Officer will refer complaints submitted, as he or she determines to be appropriate, as required under the directives of the Audit Committee of the Board of Directors or as required by applicable law.

III. Reporting Compliance Complaints.

The Company urges any person desiring to make a Compliance Complaint to contact the acting Compliance Officer as may be designated from time to time. For persons who wish to report a Compliance Complaint but do not wish to contact the Compliance Officer directly, or wish to remain anonymous, the Company has established the following alternative procedures to report a Compliance Complaint:

(a) Telephone Hotline: Any person may call **(833) 470-7214** to report a Compliance Complaint. The telephone call will be received by a third-party contractor specifically engaged to provide Compliance Complaint services.

(b) Online: Any person may visit **ngsg.ethicspoint.com** to report a Compliance Complaint. The online complaint will be reviewed by a third-party contractor specifically engaged to provide Compliance Complaint services.

(c) Written Complaints: Any person may report a Compliance Complaint to the Compliance Officer in writing, marked CONFIDENTIAL, and mailed to the following address: WHISTLEBLOWER POLICY COMPLIANCE OFFICER (CONFIDENTIAL), Natural Gas Services Group, Inc, 601 State St, Suite 400, Southlake, TX 76092.

(d) Audit Committee: Any person may report a Compliance Complaint to the Audit Committee directly, orally, or in writing marked CONFIDENTIAL and mailed to the following address: AUDIT COMMITTEE (CONFIDENTIAL), Natural Gas Services Group, Inc, 601 State St, Suite 400, Southlake, TX 76092.

Upon receipt of a Compliance Complaint, the Compliance Officer or the Audit Committee, as applicable, will acknowledge receipt to the person reporting the Compliance Complaint if possible.

IV. Review and Investigation of Compliance Complaints.

Compliance Complaints received by the Compliance Officer or the Audit Committee, as applicable, will be reviewed and investigated either by themselves or by a designated employee, outside counsel, advisor, expert, or third-party service provider. If determined to be necessary by the Compliance Officer or the Audit Committee, as applicable, the Company shall provide for appropriate funding to obtain and pay for additional resources that may be necessary to conduct the investigation, including, without limitation, retaining outside counsel and/or expert witnesses. Unless otherwise directed by the Compliance Officer or the Audit Committee, as applicable, any person assigned to investigate a Compliance Complaint will report his or her findings and recommendations to both the Compliance Officer and the Audit Committee.

At least once each calendar quarter and whenever else as deemed necessary, the Compliance Officer shall submit a report to the Audit Committee (and any member of Company management that the Audit Committee directs to receive such report) that summarizes each Compliance Complaint made to the Compliance Officer within the last twelve (12) months and show specifically: (i) the complainant (unless anonymous, in which case the report will so indicate), (ii) a description of the substance of the Compliance Complaint, (iii) the status of the investigation, (iv) any conclusions reached by the investigator and (v) findings and recommendations. The Audit Committee shall review all Compliance Complaints periodically.

V. Confidentiality and Anonymity of Persons Reporting Compliance Complaints.

While the Company prefers that persons reporting Compliance Complaints identify themselves to aid in the investigation, if necessary, reports may be made anonymously if desired. If requested by the employee, the Company will protect the confidentiality and anonymity of an employee who makes a Compliance Complaint to the fullest extent possible, consistent with the need to conduct an adequate review and investigation of the Compliance Complaint. The Company is not obligated to protect the confidentiality and anonymity of a non-employee person who makes a Compliance Complaint.

VI. Access to Reports and Records Regarding Compliance Complaints.

All reports and records associated with Compliance Complaints are considered confidential information, and access will be restricted to the Compliance Officer, the members of the Audit Committee, and such other persons reasonably determined by the Compliance Officer or the Audit Committee to require such access.

VII. Disclosure of Investigation Results.

Compliance Complaints and any resulting investigations, reports, or resulting actions will generally not be disclosed to the public except as required by any legal requirements or regulations or by any Company policy in place at the time.

VIII. Retention of Records.

All Compliance Complaints and documents relating to a Compliance Complaint made through the procedures outlined in this Policy shall be retained for at least five (5) years from the date of the Compliance Complaint, after which time the information may be destroyed unless the information may be relevant to any pending or potential litigation, inquiry or investigation, in which case the information may not be destroyed and must be retained for the duration of that litigation, inquiry or investigation and thereafter as necessary.

IX. No Retaliation.

Any individual who, in good faith, reports a possible violation of the Company's Code of Ethics, this whistleblower policy, or of law, or any concerns regarding questionable accounting or auditing matters, even if the report is mistaken, or who assists in the investigation of a reported violation, will be protected by the Company. Retaliation in any form against these individuals will not be tolerated. Any act of retaliation should be reported immediately and will be disciplined appropriately.

Specifically, the Company will not discharge, demote, suspend, threaten, harass, or in any other manner discriminate or retaliate against any employee with respect to the terms and conditions of the employee's employment because of any lawful act done by that employee to either (a) provide information, cause information to be provided, or otherwise assist in any investigation regarding any conduct that the employee reasonably believes constitutes a violation of any Company code of conduct, law, rule, or regulation, including any rule or regulation of the SEC or any provision of federal or state law relating to fraud against shareholders, or (b) file, cause to be filed, testify, participate in, or otherwise assist in a proceeding filed or, to the employee's knowledge, about to be filed relating to an alleged violation of any such law, rule, or regulation.

If you have been subject to any conduct that you believe constitutes retaliation for having made a report in compliance with this whistleblower policy or for having participated in any investigation relating to an alleged Compliance Complaint, please immediately report the alleged retaliation to the Head of Human Resources.