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# SHELF DRILLING VENDOR CODE OF CONDUCT

## 1. Overview

Shelf Drilling, Ltd., any of its subsidiaries and any company within the Shelf Drilling group of companies (together “Shelf Drilling”) is committed to conducting its business in an ethical, legal, safe and environmentally and socially responsible manner. Our vendors are our valued business partners with whom we want to have mutually-beneficial working relationships. To maintain these relationships, and to minimize legal and reputational risks, it is important that our vendors conduct their business in a manner that is consistent with Shelf Drilling’s corporate values and policies.

This Vendor Code of Conduct (“Code”) sets out Shelf Drilling’s business conduct and ethical performance requirements for all third parties, who conduct or intend to conduct business with and/or on behalf of Shelf Drilling including its agents, representatives, consultants, business partners, suppliers and any other similar parties, including, but not limited to, their directors and employees (“Vendor”). Shelf Drilling expects its Vendors to ensure that their vendors and sub-contractors are given notice of this Code and are required to adhere to the requirements set out herein.

Our core expectations are summarized below. Please refer to the following Section 2 of this Code for additional guidance in this regard.

1. Vendors must act with integrity in all business dealings.
2. Vendors must not give or accept gifts and entertainment benefits which would be considered excessive by an objective observer.
3. Vendors must not give or accept facilitation payments, bribes, kickbacks or any other type of improper payment.
4. Vendors must understand and ensure compliance with all applicable laws and regulations.
5. Vendors will not enter into other agreements that put them in a position of conflict with their contractual or other obligations to Shelf Drilling.
6. Vendors will treat all their employees ethically and fairly and show respect for human dignity and the rights of the individual.
7. Vendors will provide work environments that are safe for workers and minimize their impact on the environment.
8. Vendors will not disclose sensitive information about Shelf Drilling or the Contract with Shelf Drilling without Shelf Drilling’s written consent to do so.

## 2. Guidance

The sections below provide additional guidance on our core expectations. Please note the examples provided are illustrative and do not cover all possible scenarios.

### 2.1 Integrity in Business dealings

All Vendors are expected to conduct their business activities with (or on behalf of) Shelf Drilling in an honest, ethical and transparent manner. Any attempt or form of corruption,

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illegal price fixing, anti-competitive behaviour, embezzlement or falsification of documents is prohibited.

## 2.2 Gifts and Entertainment

Vendors shall not give to, nor accept from, a representative of Shelf Drilling any gifts, entertainment or other favours of more than nominal value. Exchanges of gifts and entertainment are permissible only if they are occasional, modest and not excessive. The monetary value of the nominal gifts, or entertainment benefit, if any is given, must be properly recorded by the Vendor. Shelf Drilling reserves the right to request and review documented evidence from Vendors of the monetary value of a gift or the entertainment / benefit.

## 2.3 Bribery and other Improper Payments

Shelf Drilling fully complies with global anti-corruption laws, including the U.S. Foreign Corrupt Practices Act ("FCPA") and UK Bribery Act 2010, and has a policy of zero tolerance for bribery and corruption. Accordingly, Vendors must not give or accept facilitation payments, bribes, kickbacks or any other type of improper payment to or from individuals (including, but not limited to, private parties and any government officials) for the purpose of influencing decisions in Shelf Drilling's favor or for securing any other improper advantage for Shelf Drilling and/or with a view to retaining Shelf Drilling's business. Furthermore, no facilitation payments, bribes, kickbacks or any other type of improper payment s is to be made to or by agents or other third parties representing Shelf Drilling.

## 2.4 Compliance with Laws and Regulations

Vendors are responsible for ensuring that their directors, employees, vendors and contractors understand and comply with all applicable laws. Because Shelf Drilling operates internationally, this requires understanding and complying with not only the laws of the jurisdictions in which the Vendor operates but also includes the laws of the jurisdictions with which Shelf Drilling must comply.

## 2.5 Conflict of Interest

Shelf Drilling expects that its Vendors and their individual employees will not enter into outside activities, including business interests or other contracts or employment that might interfere with or be perceived to interfere with the Vendor's contractual obligations to Shelf Drilling.

## 2.6 Employee practices and Human Rights

Vendors are required to treat all their employees and others with whom they engage on Shelf Drilling's behalf both ethically and fairly. Vendors are expected to show respect for fundamental human and labour rights of the individual as described in international human rights conventions such as the UN Convention on Human Rights and the labour rights conventions of the International Labour Organization (ILO). This includes important issues such as, providing a harassment and discrimination free workplace, acting consistently with universally accepted standards related to the exploitation of child and / or forced and / or compulsory labour, respect for fundamental labour rights, including but not limited to the right to privacy and the right to negotiate.

## 2.7 Health, Safety & the Environment

Vendors are expected to provide safe working environments for their employees and contractors to ensure that people are protected from injury and harm, and any impact on the environment is minimized. Vendors are expected to operate in accordance with all applicable health, safety, and environment (HSE) laws and regulations of their

jurisdiction of operations. In addition, Vendors are expected to be familiar with, and conform to, Shelf Drilling's HSE policy and procedures when operating on a Shelf Drilling worksite.

### 2.8 Confidentiality

In the course of conducting business with or in the process of seeking to conduct business with Shelf Drilling, Vendors may gain access to sensitive information which Shelf Drilling deems confidential. Vendors must ensure that such information is used only for its intended purpose and is not shared or divulged to any other person except with the express written permission of a suitably authorised Shelf Drilling employee.

No Vendor will use the name or logo of Shelf Drilling for publicity purposes, nor will they publish or permit to be published any information or photographs that establish the Vendor's connection with Shelf Drilling without the prior written permission of a suitably authorised Shelf Drilling employee.

## 3. Applicability

This code sets forth the minimum standard of conduct expected from Vendors with whom Shelf Drilling conducts business. It is the responsibility of all Vendors to adhere to this Code, its codified standards and the requirements of this Code and to monitor its own business activities. Breaches of the Code's requirements are taken seriously by Shelf Drilling and may lead to the termination of Shelf Drilling's relationship with the Vendor and/or disqualification from bidding for and/or being contracted to perform any further business with and/or for Shelf Drilling.

All Vendors are expected to understand and adhere to the Code when working with Shelf Drilling. Shelf Drilling reserves the right to audit Vendors to confirm they are operating in accordance with this Code.

Vendors must inform Shelf Drilling of any violation or potential violation (the "Violation") of the Code as soon as they become aware of the Violation, but, in any event, within 48 hours of the Violation. Vendors can choose to report any Violation at [compliance@shelfdrilling.com](mailto:compliance@shelfdrilling.com). Alternatively, Vendors can report any Violation either by using our toll-free externally administered confidential hotline or by utilizing a web form at <https://shelfdrilling.ethicspoint.com>. Please see the Appendix for the telephone number to call in your country. The Hotline and web-form based reporting is available 24/7 and is maintained and operated by a third-party contractor, NAVEX.

They may choose to remain anonymous and Shelf Drilling will duly investigate each Violation reported. Shelf Drilling will not tolerate any form of retaliation against any individual who, in good faith, makes a report regarding actual or potential violation of this Code.

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## Appendix

### Shelf Drilling EthicsPoint Hotlines

| Country                           | Number                         | Access Code                  |
|-----------------------------------|--------------------------------|------------------------------|
| CONGO                             | 9805007510                     | N/A                          |
| DENMARK                           | 80-83-03-93                    | N/A                          |
| EGYPT (Cairo)<br>EGYPT (Cellular) | 2510-0200<br>02-2510-0200      | 855-233-8083                 |
| GHANA                             | 0-2424-26-004                  | 855-233-8083                 |
| INDIA                             | 000-117                        | 855-233-8083                 |
| INDONESIA                         | 001-801-10                     | 855-233-8083                 |
| ITALY                             | 800-172-444<br>800-790068      | 855-233-8083<br>N/A          |
| MALAYSIA                          | 1-800-80-0011<br>1-800-81-8707 | 855-233-8083<br>N/A          |
| NIGERIA                           | 0708 060 1104                  | N/A                          |
| NORTHERN IRELAND                  | 0800-102-6435                  | N/A                          |
| NORWAY                            | 800-62-317                     | N/A                          |
| QATAR                             | 00800-100321                   | N/A                          |
| SAUDI ARABIA                      | 8008-500-233                   | N/A                          |
| THAILAND                          | 1-800-0001-33<br>1-800-011-620 | 855-233-8083<br>N/A          |
| TUNISIA                           | 503-530-7130                   | N/A                          |
| UNITED ARAB EMIRATES              | 8000-321-153                   | N/A                          |
| UNITED KINGDOM                    | 0800-102-6435                  | N/A                          |
| UNITED STATES                     | 1-(844) 916-2588               | N/A                          |
| VIETNAM                           | 1-201-0288<br>1-228-0288       | 855-233-8083<br>855-233-8083 |