



Our Code of Conduct

WE CARE



Welcome to our Code of Conduct



Thomas (Tom) Ehret
Non-Executive Chairman

Our Code of Conduct sets out the standards of integrity and behaviours that we expect from all our employees, from the board room to all our operational locations, and with everyone who does business with KCA Deutag.

Our Code of Conduct forms the basis of how we behave and interact with others. It is the foundation of our core values – WE CARE – that inspire the way we do business, our mindset and the decisions we make in our everyday roles.

Our people are our greatest asset, and our Code of Conduct acts to protect our people by guiding them on the right thing to do. Doing the right thing is vital, but not always obvious, especially with the constant new challenges we face in an ever-changing world. Our Code of Conduct is a simple guide for when we are unsure of what the right thing to do is, or we are uncomfortable with the choices in front of us.

The expectations in our Code of Conduct apply to all environments and situations where we are representing KCA Deutag.



Joseph Elkhoury
Chief Executive Officer

Whether we are interacting with colleagues, customers or third parties we all have a shared responsibility to SPEAK UP about an activity that is risky, harmful, unethical and / or goes against our policies and values.

Through our Culture of Care, KCA Deutag is fully committed to creating an environment where everyone feels safe to SPEAK UP. We ensure there is no retaliation against those who do the right thing and SPEAK UP.

There are a number of ways we encourage our people to SPEAK UP: via our **Safecall** platform, speaking in confidence to their line manager, the legal and compliance, internal audit or human resources departments, as well as any member of our leadership team.

We ask everyone to take an active role in reading and understanding our Code of Conduct. We are all individually accountable to ensure that we work ethically, making good judgement calls and always doing the right thing to **#enhancethebrand**.

“
**...TO PROTECT
OUR PEOPLE BY
GUIDING THEM
ON THE RIGHT
THING TO DO.**
”

Our Core Values

WE CARE

Our Code of Conduct is the foundation of our core values – WE CARE – which guide how we conduct ourselves in the best interest of our business – underpinning our success now and safeguarding the future of KCA Deutag.

Together, WE CARE ensures we foster an environment where everyone feels safe to express their ideas, opinions and concerns and to ask questions and admit mistakes without the fear of consequences.

Our core value 'Excellence' means executing excellence in all we do – guiding how we conduct ourselves in the delivery of our WE CARE expectations. We expect everybody that works with or for KCA Deutag to behave ethically, honestly, safely, and professionally when performing their work.



WELLBEING

Safety and wellbeing before all else.

Driving to zero incidents, ensuring everyone goes home safely and fostering a Culture of Care that nurtures development, recognition, equity, diversity and a strong sense of belonging and community.



EXCELLENCE

Executing with excellence in all we do.

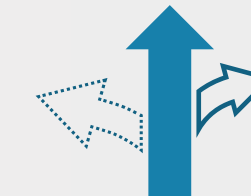
Exceeding customer and stakeholder expectations through safe, ethical, compliant, consistent and reliable operating and financial performance, quality services and equipment and provision of innovative solutions.



CUSTOMER CENTRICITY

Relentlessly focused on customer satisfaction.

Developing and delivering quality services and innovative products and solutions that are aligned with the current and future needs of our customers while always aspiring to be the partner of choice.



AGILITY

Prepared for anything, anticipating everything.

Proactively collaborating, adapting and learning so we are able to pivot as required while we maintain a discipline around affordability in all our work.



RETURNS

Generating value, delivering growth.

Delivering profitable and sustainable growth, increased returns and greater value to all our stakeholders through disciplined financial management, investment and controls.



ENERGY TRANSITION

Innovating today for the energy of tomorrow.

Committing to support and enable the energy transition and ensure security of supply through investment in affordable energy innovation and delivering upon our sustainability strategy and plan.

The Code of Conduct

This Code of Conduct outlines our ethical values and the key standards we set for, and expectations we have of, everyone who works with or for KCA Deutag.

THE EXPECTATION IS OUR CODE OF CONDUCT IS APPLIED IN THE OFFICE, OUTSIDE THE OFFICE, IN THE FIELD, IN INTERACTIONS WITH THIRD PARTIES, AND ANYWHERE WHERE KCA DEUTAG IS BEING REPRESENTED.

The Code of Conduct sets out the minimum behaviours we expect, and acts as a signpost to the key policies, procedures and guidance documents which govern how we work, which are linked and referenced to within this document.

Alignment with our WE CARE values, and adherence to this Code of Conduct, will help to ensure employees and KCA Deutag as a whole acts lawfully, responsibly and sustainably.

All employees are expected to familiarise themselves with the Code of Conduct and to apply it in their day-to-day functions. It applies regardless of geographic location, business area, or level of seniority. The Code of Conduct and related policies will not always cover every situation we may face, KCA Deutag relies on each individual to use good judgement, to familiarise themselves with the Code of Conduct and related policies, and to apply it in their day-to-day functions.

Breach of this Code of Conduct by KCA Deutag employees is a serious matter which can result in disciplinary action.

You are responsible



What’s expected of us:

We are all responsible for reading this code, speaking-up and understanding the risks.

- Follow the code
- Act as a role model
- Encourage your team to SPEAK UP
- Promote compliance in your organisation
- Recognise poor behaviour and hold people accountable.

SPEAK UP

Doing the right thing is **EVERYONE'S** responsibility and vital to the success of our business. It's not always easy to know if the decision we are making is the right one. Anyone that is concerned that something they are doing may raise an issue under the Code of Conduct, must:

Pause →

...from what you are doing.

Consider →

Ask yourself these questions:

- Does this breach the Code of Conduct or the law?
- Does it feel "right"? Would KCA Deutag want me to do this?
- Am I being pressured to make the wrong choice?
- Is this situation covered by a policy or procedure or guidance?
- Would I be able to defend my actions if questioned later?
- Would I be able to justify my actions or decisions to my family?
- How would I feel if I read about my actions or decisions in the media?

Speak →

...to someone else to check their view. In most cases this will be your line manager, or a trusted colleague, but there may be times when it is appropriate to seek support from elsewhere.

Escalate.

If in doubt, you should **SPEAK UP**.

Non-retaliation

KCA DEUTAG DOES NOT TOLERATE RETALIATION OF ANY KIND WHEN SPEAKING UP IN GOOD FAITH.

Our commitment to nurturing an atmosphere of psychological safety encourages people to **SPEAK UP** without fear.

How we manage concerns:

- **We assess:**
we ensure that whistle blown issues come to the Legal and Compliance department for confidential investigation and review
- **We address:**
we investigate matters in a timely manner
- **We act:**
we discuss and apply policies and disciplinary action as necessary where there has been wrong doing.



OUR SPEAK UP CHANNELS

Contact Safecall

🌐 www.safecall.co.uk/en/clients/kcadeutag/

✉ kcad@safecall.co.uk

Alternatively you can contact your **line manager**, any member of the **Legal and Compliance**, **Human Resources**, **Internal Audit** or **Leadership** teams directly.

Accountability

If you consider: (i) you, (ii) KCA Deutag employees, and / or (iii) a KCA Deutag supplier or representative may have caused a breach of

- the law,
- this Code of Conduct or
- any applicable KCA Deutag policy, procedure or guidance,

you must notify us via the SPEAK UP page.

Employees who make a notification about a breach in good faith will not be subjected to detrimental treatment by KCA Deutag for doing so. KCA Deutag will not tolerate any attempt to retaliate against anyone who has made a notification in good faith. Any such retaliation is prohibited under this Code of Conduct and will be taken seriously by KCA Deutag.

Further information in relation to KCA Deutag’s management of good faith notifications can be found in the **Whistleblowing and Non-Retaliation policy**.

IT IS EVERYBODY’S RESPONSIBILITY TO CONDUCT THEMSELVES IN COMPLIANCE WITH OUR CODE OF CONDUCT, POLICIES, PROCEDURES AND LAWS.



Non-compliance

KCA Deutag may take appropriate disciplinary action, up to and including termination of employment, against any employees who fail to comply with applicable laws, this Code of Conduct or any applicable KCA Deutag policy, procedure or guidance.

In addition to its internal processes, KCA Deutag may refer any concern regarding employees to law enforcement and / or regulators.

Complying with the Law

AT KCA DEUTAG, WE ARE COMMITTED TO CARRYING OUT ALL BUSINESS ACTIVITIES IN A LAWFUL MANNER.

This means that we will comply with all applicable laws wherever we are operating. We expect all KCA Deutag employees to do the same. We work in many countries and sometimes local laws, regulations and customs conflict with our Code of Conduct.

Wherever there is a conflict, you must apply the strictest standard. Do not follow customs that violate the Code of Conduct. If in doubt you can contact your line manager, any member of the Legal and Compliance, Human Resources, Internal Audit or Leadership teams directly or SPEAK UP via **Safecall**.



Charitable Donations & Political Contributions

We believe that as a responsible organisation, contributing to the success and wellbeing of the communities in which we work benefits us all.

KCA Deutag fosters charitable initiatives aimed at improving the communities in which we operate and live. All charitable giving must be public, aligned with our WE CARE values and only made to established organisations with transparent reporting practices.

Charitable initiatives can be discussed with our local KCA Deutag Charity Committees and must be pre-approved in accordance with committee governance.

A note on Political Contributions: KCA Deutag does not make political contributions and **we take a zero tolerance approach to employees who make political contributions on behalf of KCA Deutag**. If in doubt you can contact your line manager, any member of the Legal and Compliance, Human Resources, Internal Audit or Leadership teams directly or SPEAK UP via **Safecall**.

Health & Safety

People are our greatest asset and we are committed to creating a Culture of Care where safety can be shaped through positive conversations, led by our leaders' ability to create an open environment, show vulnerability and connect sincerely with the workforce to #drivetozero incidents.

This reflects our commitment to providing a safe working environment, and we believe that our activities can be incident free every day, 365 days a year, in all our locations worldwide.

We are committed to providing a safe, secure and healthy place of work where we also avoid harming the health or safety of the communities in which we operate. We expect all KCA Deutag employees to comply with the **Health & Safety policy**, and other applicable policies, procedures and guidance. We also expect KCA Deutag employees to take personal responsibility for health and safety.

We recognise that people need to feel psychologically safe in order to contribute new ideas as well as SPEAK UP and raise concerns on safety or any other issue, without fear of being reprimanded or subject to negative consequences. Nurturing an atmosphere of psychological safety within our organisation ensures a sustainable future for our business as well as enhancing physical safety. For more detail on KCA Deutag's approach to health and safety, please consult our **Health & Safety policy**.

No KCA Deutag employee will be retaliated against for stopping a job due to safety concerns or non-compliance with the safety rules – which are in place to keep our people safe.

**KCA DEUTAG
DOES NOT
TOLERATE
RETALIATION OF
ANY KIND WHEN
SPEAKING UP IN
GOOD FAITH.**



People

CARING FOR OUR PEOPLE UNDERPINS EVERYTHING WE DO.

We are committed to delivering a workplace where safety, health, wellbeing, development and recognition are ingrained in our culture. We will not tolerate any form of retaliation against colleagues who SPEAK UP.

Diversity, equality and inclusion

As an international company with a hugely diverse workforce we are committed to fostering a Culture of Care where we create a collaborative work environment to ensure that everyone feels safe and welcome. This means treating all our people fairly and with respect. We are proud of our diverse and inclusive culture and prioritise:

- Maintaining our Culture of Care
- Helping to nurture collaborative, diverse and inclusive workforces
- Respecting the beliefs, opinions, and cultural differences of colleagues we work with as part of our **#OneTeamWay**.

We value all people within KCA Deutag and we do not tolerate any unfair discrimination within our workplace based on race, gender, age, sexual orientation, gender identity, marital status, disability, or any other characteristic protected by applicable laws. Our Diversity, Equity and Inclusion (DE&I) strategy provides a framework for fair hiring, action and education across our organisation. Practices such as modern slavery, child labour, forced or indentured servitude, and other human rights abuses have no place in our organisation.

Modern slavery

KCA Deutag is committed to preventing modern slavery, including in its supply chain. Modern slavery is a serious crime in which victims are exploited for someone else’s gain. Modern slavery can take many forms including trafficking of people, forced labour and servitude.

KCA Deutag has published a **Modern Slavery Statement** which sets out its approach to combating modern slavery risk. If KCA Deutag employees have concerns about potential modern slavery, they should make a notification using one of our SPEAK UP channels.



Bullying and harassment

As part of our Culture of Care we do not tolerate any physical, verbal or non-verbal forms of abuse or harassment. This includes any unwanted behaviour that could reasonably be considered offensive, intimidating or humiliating, as well as any form of sexual harassment. Exclusionary behaviour may also be considered harassment or bullying.

- ✓ **Respect**
- ✓ **Free from harassment**
- ✗ **Sexual or derogatory jokes**
- ✗ **Excluding others**
- ✗ **Shouting**

REPORT DISCRIMINATION, HARASSMENT AND BULLYING

Contact Safecall

🌐 www.safecall.co.uk/en/clients/kcadeutag/
✉ kcad@safecall.co.uk

Alternatively you can contact any member of the **Legal and Compliance, Human Resources, Internal Audit** or **Leadership** teams directly.

Dealing with Third Parties

OUR SUPPLIERS AND BUSINESS PARTNERS ARE ESSENTIAL TO OUR ABILITY TO DO BUSINESS TO THE HIGHEST STANDARD.

THAT’S WHY WE CAREFULLY CHOOSE WHO WE DO BUSINESS WITH.

KCA Deutag is committed to winning business the right way through propriety in its business dealings, and to the prevention of bribery and all forms of corruption. This approach informs how we deal with third parties, and how we expect employees to conduct themselves when dealing with us.

Bribery

When we discuss engaging in “bribery” in this Code of Conduct, this includes offering, soliciting and accepting bribes, facilitation payments and other improper payments made in connection with business.

We take a zero-tolerance approach to bribery involving KCA Deutag employees or persons who provide services to KCA Deutag. KCA Deutag employees must not offer or accept bribes in any circumstances, no matter where they are in the world.

If KCA Deutag employees engage in bribery they, and KCA Deutag, could face serious consequences, including criminal prosecution.

KCA Deutag has implemented a compliance system to prevent bribery. More information is available in our **Anti-Bribery and Corruption policy**.

Gifts and entertainment

Gifts and entertainment can play an appropriate role in developing and maintaining business relationships.

However, inappropriate giving, or receipt, of gifts or entertainment can amount to bribery or corruption. Even where gifts or entertainment are not intended to improperly influence business decisions, they can carry a risk of being perceived to be inappropriate.

All gifts and entertainment received by KCA Deutag employees in the course of business (or arising from business contacts) must be declared and recorded in accordance with our **Gifts and Entertainment Policy**.

Gifts or entertainment offered to KCA Deutag employees which are not permitted by the Gifts and Entertainment Policy must be declined or returned to their providers.

KCA Deutag employees should not offer gifts or entertainment in the course of business (or to business contacts) other than in accordance with the **Gifts and Entertainment Policy**.

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Conflicts of interest

Business decisions at KCA Deutag should be based solely on what is in the company's best interests. KCA Deutag will ensure that decision-making is not affected by actual or potential conflicts of interest.

Conflict of interest examples

- Family or romantic relationships with supervisors, co-workers, customers, competitors, or suppliers
- Having secondary employment or working for (or as) a competitor, customer or supplier
- Using company resources, equipment or time to perform work not related to our business, regardless of whether it is done in the course of secondary employment or otherwise
- Receiving excessive gifts, meals, or entertainment (please see our **Gifts and Entertainment Policy**).

KCA Deutag employees should ensure that their interests do not conflict (and could not be seen to conflict) with the interests of KCA Deutag. For example, employees must not influence business decision-making in relation to matters in which they have any financial or personal interest.

Where KCA Deutag employee's personal or financial interests have the potential to conflict with the interests of KCA Deutag as a whole (for example, if a close connection is tendering to provide work to KCA Deutag), this must be declared in accordance with our **Conflict of Interests policy**.

KCA Deutag will take appropriate steps to manage any actual or potential conflict of interests. This might include, for example, exclusion of an individual from any involvement in appointment of third parties in the area in which that individual has an actual or perceived conflict of interest.

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What is a third party?
**SUPPLIERS,
JV PARTNERS,
CUSTOMERS AND
AGENTS ARE ALL
EXAMPLES OF
THIRD PARTIES.**

Third party due diligence

Before engaging in dealings with suppliers, representatives, or third parties, KCA Deutag will carry out necessary due diligence, to assess any risks associated with dealing with the proposed supplier or other third party, and any mitigations that need to be put in place as a result.

Suppliers, joint ventures or joint venture partners, customers and agents are all examples types of third parties. Different third parties pose varying levels of corruption risk depending upon the nature of our relationship with them, the types of activities and the location of their work. KCA Deutag defines a High Risk Third Party (**H RTP**) as either a supplier delivering specific services in a high risk location, a third party where ‘**red flags**’ have arisen from due diligence or any third party supporting business development or engaging with Government or foreign public officials. Our procedures and policies, in relation to due diligence, explain the requirements in full.

KCA Deutag treats all joint ventures, joint venture partners (shareholders), agents and government officials / bodies as H RTPs. KCA Deutag does not work with partners, customers, suppliers, representatives or individuals who we’re banned from dealing with by international sanctions or trade restrictions.

Facilitation payments

KCA Deutag takes a zero tolerance approach to facilitation payments.

Facilitation payments are a type of bribe and is a value given to an official personally to get them to do (or speed up the performance of) something they should do anyway. For example, paying a customs official to allow goods to clear customs when our paperwork is in order, or paying a visa official personally to approve a visa application.

Facilitation payments are illegal, regardless of their size or frequency and KCA Deutag takes a zero tolerance approach to employees, agents and other intermediaries, joint ventures, joint venture partners, contractors and suppliers from making any kind of facilitation payments on KCA Deutag’s behalf.

Adopt the **Pause → Consider → Speak → Escalate** approach for any concerns.

Sanctions & International Trade

**KCA DEUTAG
IS AN
INTERNATIONAL
BUSINESS.**

**IT ENGAGES IN
OPERATIONS
AND MAINTAINS
BUSINESS
RELATIONSHIPS
ACROSS THE
WORLD.**

KCA Deutag must always comply with applicable sanctions laws, and rules on international trade. For example, we need to:

- be careful not to deal with sanctioned individuals, and / or third party entities if to do so would be a contravention of applicable sanctions; and,
- only export controlled goods to territories and end users in accordance with rules on international trade.

Sanctions can have extra-territorial application. This means that they can be binding even outside of the country from which they have been issued. In certain circumstances, KCA Deutag may recuse employees from involvement in certain or specific business activities, if their involvement could give rise to the application of sanctions. You can complete the recusal form [here](#). This can be returned to the Legal and Compliance department.

Breaches of financial or trade sanctions can result in serious criminal, regulatory and financial consequences for KCA Deutag and the employees involved.

If KCA Deutag employees are not sure whether activity is lawful under applicable sanctions laws, or rules on international trade, they should adopt the **Pause → Consider → Speak → Escalate** approach and, where appropriate, take advice from the Legal and Compliance team within KCA Deutag.

KCA Deutag's approach to compliance with sanctions and international trade law is set out more fully in its Sanctions and International Trade Control policy.



Confidential Information, Data Protection & Social Media

Confidentiality

Information provided to KCA Deutag employees in the course of their employment, or business, should be treated as confidential.

Our evolving world means that we rely on data to help us make good decisions in our day-to-day roles. Having access to the right information can empower our operations, boost our innovation, and keep our people safe. However, information used or shared in the wrong way can have serious consequences. That is why we all must ensure we use the information we have ethically, responsibly, and legally.

There will be circumstances where confidential information is subject to enhanced restrictions e.g., human resources / financial information. Confidential information must not be shared outside of KCA Deutag unless to do so is: (i) compatible with KCA Deutag’s data protection obligations, (ii) otherwise lawful and (iii) there is a good business reason to do so. All confidential or otherwise restricted information must be handled in accordance with relevant policies.

Data protection

KCA Deutag is subject to data protection laws in the jurisdictions in which it operates. KCA Deutag is committed to processing personal data fairly, transparently and lawfully.

KCA Deutag employees must only process data where necessary for their duties. Any potential data breach must be reported to the Data Protection Officer immediately.

Social media

At KCA Deutag, we believe in leveraging social media platforms to share accurate and positive information about our organisation in a responsible and ethical manner. We encourage our employees to be respectful and inclusive when interacting with others online, ensuring they prioritise privacy, safeguard personal data, and refrain from engaging in any online activities that may harm others.

Constructive engagement and empathy are highly valued, as they foster healthy discussions and contribute to digital well-being. By adhering to our Code of Conduct, each individual can play a vital role in creating a positive, accurate, and supportive social media environment that benefits everyone associated with KCA Deutag.



Fair Competition

KCA DEUTAG IS SUBJECT TO THE COMPETITION LAWS (SOMETIMES KNOWN AS ANTITRUST LAWS) OF THE JURISDICTIONS IN WHICH IT OPERATES.

In dealing with competitors, KCA Deutag, and its employees, must ensure that any commercially sensitive information (such as information about pricing or strategy) is not shared.

If a competitor seeks to engage in discussions with KCA Deutag employees relating to commercially sensitive information, the KCA Deutag employees should immediately terminate the discussion and promptly inform the Legal and Compliance team.

KCA Deutag’s approach to ensuring compliance with competition law is set out in more fully in its Competition Law policy.



Tax Evasion

KCA Deutag is subject to various tax regimes in the jurisdictions in which it operates. KCA Deutag and its employees comply with all applicable tax laws.

They must not personally engage in, or facilitate, tax evasion, or assist anyone else to do so.

If KCA Deutag employees assist, knowingly or unknowingly, another person or organisation to evade tax (whether a UK tax, or a tax imposed by another jurisdiction), they are likely to be committing a criminal offence. KCA Deutag may also be exposed to criminal and civil liability.

If in doubt, you can contact your line manager, any member of the Legal and Compliance, Human Resources, Internal Audit or Leadership teams directly or SPEAK UP via **Safecall**.

Our Assets

Our ability to deliver our core values of Excellence and Customer Centricity relies on us making ethical decisions, every day.

Our customers expect safe, consistent and reliable operating and financial performance as well as quality services and equipment and the provision of innovative solutions, making us the partner of choice.

How we operate our assets is at the core of these expectations. Our employees, customers and shareholders don't just expect us to be good stewards of our assets – they depend on it. This means we always follow the law, follow our policies, and use good judgment when deciding how to use them.

Facility security

The physical safety and security of our people is of the highest importance. Keeping our people secure means keeping our facilities secure, both on land and offshore. As such, unauthorised firearms and weapons are prohibited on all KCA Deutag property. We expect anyone present at our facilities to adhere to facility rules and to comply with our security policies.

Company equipment

Our equipment provides us with the critical tools we need to deliver the highest quality service to our customers. We expect all of our employees, contractors, and suppliers to operate and maintain company equipment responsibly, safely, and only for authorised purposes.

In the rare case where personal use of company equipment is permitted, it must be limited, not negatively impact productivity, or used in a way that is illegal, detrimental to the success of the company, or otherwise prohibited by company policies. It is your responsibility to appropriately use company equipment and information systems in accordance with our policies.

What this means for you:

- Only use company equipment according to company policies.
- Never use company equipment to transmit content that is inappropriate, sexually suggestive, physically threatening, or could otherwise be detrimental to our reputation.
- Protect all company equipment that is entrusted to you from theft, loss, damage, misuse, or unauthorised access.

WE EXPECT ALL OF OUR EMPLOYEES, CONTRACTORS, AND SUPPLIERS TO USE COMPANY EQUIPMENT RESPONSIBLY, SAFELY, AND ONLY FOR AUTHORISED PURPOSES.



Further information in relation to the matters discussed in this Code of Conduct can be found in the documents listed below.

If you would like to discuss any aspect of this Code of Conduct, or the documents set out below, you should contact your line manager or the Compliance team within KCA Deutag.

#enhancethebrand