



Supplier and  
Third-Party

# Code of Ethics





# Supplier and Third Party Code of Ethics

## AT KCA DEUTAG WE CONDUCT OURSELVES IN THE BEST INTEREST OF OUR BUSINESS, EXECUTING EXCELLENCE IN ALL WE DO...

...exceeding customer and stakeholder expectations through safe, ethical, compliant, consistent and reliable operating and financial performance, providing quality services and equipment and the delivery of innovative solutions.

How we conduct ourselves in the delivery of these expectations and how we expect our suppliers, representatives and other third parties to conduct themselves ensuring that they work to align to equivalent standards to our own are key to that success.

This Supplier and Third-Party Code of Ethics ("**Code of Ethics**") sets out the key standards we expect from our suppliers and third parties with whom we work.

Where a KCA Deutag supplier, representative or other third party ("the principal supplier") with whom KCA Deutag works engages its own suppliers, or sub-contracts any work ("the secondary supplier"), this Code of Ethics also applies to those suppliers, representatives and / or sub-contractors, and references to "supplier" or "third party" in this Code of Ethics should be read accordingly.

It is the responsibility of the principal supplier to maintain appropriate oversight to ensure compliance by the secondary supplier with this Code of Ethics.

The Code of Ethics:

- **is a floor rather than a ceiling:** suppliers and third parties are, subject to compliance with applicable law, and any agreement with KCA Deutag, free to exceed any of the basic expectations set out in this Code of Ethics;
- **is not prescriptive:** except as otherwise provided for, it is for suppliers / third parties to decide how they ensure compliance with this Code of Ethics;
- **is not exhaustive:** KCA Deutag may set out further expectations of a supplier or third party in other documents – for example in an agreement between us and the supplier or third party.

KCA Deutag expects our suppliers and third parties with whom we work to comply with applicable law at all times. We also expect them to avoid any conduct that is likely to adversely affect KCA Deutag's business or reputation.

Where a supplier or third party considers that there may be any inconsistency between this Code of Ethics and their obligations under applicable law, they must draw this to the attention of KCA Deutag promptly.





# 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.**

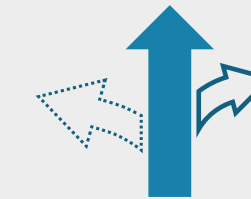
Exceeding customer and stakeholder expectations through safe, ethical, compliant, consistent and reliable operating and financial performance, quality services and equipment and provision of innovative solutions.



### 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.



# Health & Safety

**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.

KCA Deutag recognises that our suppliers and third parties with whom we work play a key role in our fulfilment of our health and safety commitments. We therefore expect suppliers and other third parties with whom we work to maintain an adequate health and safety compliance framework.

Where employees from a supplier or third party are working on KCA Deutag operations, or at sites for which KCA Deutag has responsibility, they should comply with KCA Deutag's **Health & Safety policy**, and any other applicable KCA Deutag policy, procedure or guidance.

**WE BELIEVE THAT OUR ACTIVITIES CAN BE INCIDENT FREE EVERY DAY, 365 DAYS A YEAR.**





# People

**Caring for our People underpins our core values. People are our greatest asset, and we are committed to delivering a workplace where health, safety, wellbeing, development and recognition are integrated into our culture.**

We maintain high standards of workers’ rights throughout KCA Deutag. We expect our suppliers and third parties with whom we work to align with these standards, including by complying with applicable employment and labour laws.

KCA Deutag takes a zero-tolerance approach to human-trafficking, modern slavery and worker exploitation. We will not work with suppliers or other third parties who engage in these practices.

KCA Deutag also takes a zero-tolerance approach to bullying, harassment and discrimination of any form. We expect our suppliers other third parties with whom we work to align with this approach, and to take appropriate steps to prevent harassment or discrimination within their own 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.





# Business Integrity

**KCA Deutag is committed to propriety in its business dealings, and to the prevention of bribery and all forms of corruption. We expect high standards of business integrity from all of our suppliers and third parties with whom we work.**

**Bribery**

When we discuss engaging in “bribery” in this Code of Ethics, this includes offering, soliciting and accepting bribes; facilitation payments (e.g. payments made to public officials to obtain or speed up delivery of services which they the public officials are, in any case, required to provide) and other improper payments made in connection with business.

KCA Deutag takes a zero-tolerance approach to bribery involving KCA Deutag employees or by suppliers or third parties. Suppliers and third parties with whom KCA Deutag works must comply with all applicable anti-bribery and anti-corruption laws. They must not offer or accept bribes in any circumstances, no matter where they are in the world, and they must maintain compliance systems to prevent bribery within their own organisations.

**Gifts and entertainment**

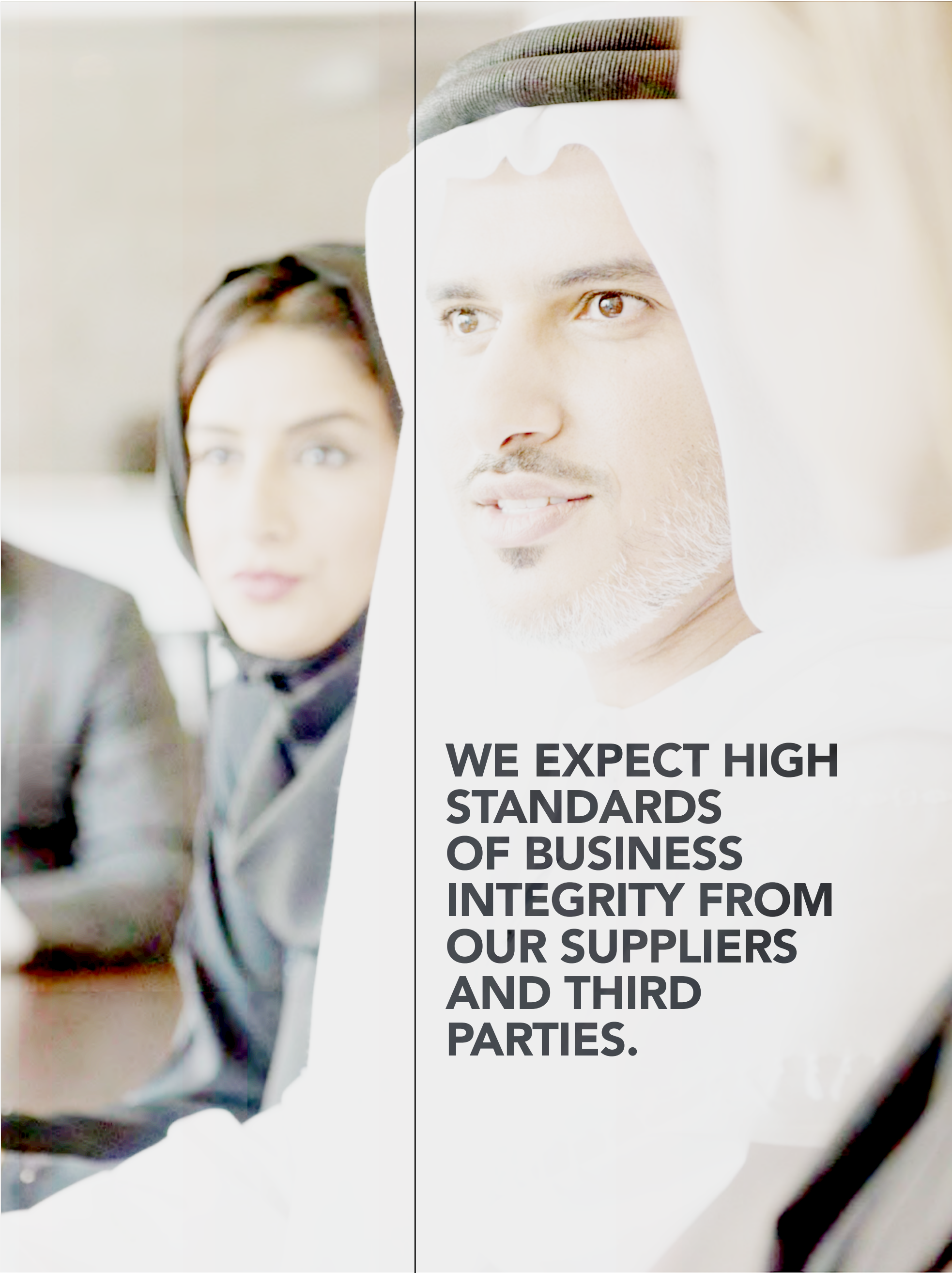
KCA Deutag recognises that gifts and entertainment can play an appropriate role in developing and maintaining business relationships.

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.

Suppliers and third parties should not offer gifts or entertainment to KCA Deutag employees with the intention of improperly influencing business decisions, or where such gifts or entertainment could be perceived as inappropriate.

Gifts or entertainment offered to KCA Deutag employees by suppliers or third parties which are not permitted by KCA Deutag’s Gifts & Entertainment Policy will be returned.

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**WE EXPECT HIGH STANDARDS OF BUSINESS INTEGRITY FROM OUR SUPPLIERS AND THIRD PARTIES.**

Conflicts of interest

Business decisions at KCA Deutag should be based solely on what is in the company’s best interests.

Suppliers or other third parties who have a close connection with KCA Deutag employees other than arising from business (e.g. a family relationship) must:

- disclose the close connection immediately to KCA Deutag via SPEAK UP;
- not seek to take advantage of the close connection.

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

Integrity due diligence and investigations

KCA Deutag maintains an integrity due diligence process in respect of prospective and existing suppliers and third parties.

In addition, from time-to-time, KCA Deutag will consider it necessary to investigate concerns in respect of a supplier or third party.

We expect suppliers and third parties with whom we work to engage with us in a transparent fashion and to comply with any due diligence or investigative process we are undertaking, including, subject to compliance with applicable law, by providing us with information we reasonably request promptly and in full.

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.

Prevention of tax evasion

KCA Deutag is subject to various tax regimes in the jurisdictions in which it operates. KCA Deutag and its employees, third parties, agents and representatives are expected to always comply with applicable tax laws.

Nobody shall personally engage in, or facilitate, tax evasion, or assist anyone else to do so.

Assisting, knowingly or unknowingly, another person or organisation to evade tax (whether a UK tax, or a tax imposed by another jurisdiction) is likely to be considered a criminal offence. KCA Deutag may also be exposed to criminal and civil liability.

If in doubt, you can SPEAK UP via **Safecall**.



# Confidential Information & Personal Data

**Information provided to suppliers or third parties with whom we work should, in general, be treated as confidential and should not be shared with others, without KCA Deutag’s consent.**

From time to time, KCA Deutag may require suppliers or third parties to take additional measures to protect confidential information.

Where a KCA Deutag supplier or third party with whom we work processes personal data which it has received from KCA Deutag or its employees, it must do so in compliance with applicable law.



# Sanctions & International Trade

**We expect our suppliers and other third parties with whom we work to ensure they comply with applicable laws regarding competition (antitrust), sanctions and other trade laws.**

Where a supplier provides us with goods, technology or services, unless otherwise agreed with KCA Deutag, they are responsible for ensuring that any necessary export / import / customs or other trade.

KCA Deutag does not work with suppliers, other third parties or individuals who we are banned from dealing with by international sanctions or trade restrictions.



# 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.**

### OUR SPEAK UP CHANNELS

**Contact Safecall**

🌐 [www.safecall.co.uk/en/clients/kcadeutag/](http://www.safecall.co.uk/en/clients/kcadeutag/)

✉ [kcad@safecall.co.uk](mailto: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.



**#enhancethebrand**