

Whistleblowing & Non-Retaliation Policy

1 INTRODUCTION

- 1.1 Our WE CARE values are the foundation of the way we conduct ourselves in the best interests of our business – underpinning our success now and for the future.
- 1.2 Our Core value ‘Excellence’ means exceeding customer and stakeholder expectations through safe, consistent and reliable operating and financial performance, by provision of quality services, equipment and innovative solutions. This value includes how we conduct ourselves in the delivery of these expectations.
- 1.3 This policy is a key aspect of ensuring adherence, by all KCA Deutag personnel, to the law, our core values, and applicable policies, procedure and guidance.
- 1.4 We encourage all KCA Deutag personnel to raise any matters of genuine concern with us. We will take any allegations seriously and investigate matters appropriately and, as far as is possible, confidentially.

2 PURPOSE

- 2.1 The purpose of this policy is to:
 - 2.1.1 provide an internal mechanism for reporting, investigating and remedying any workplace wrongdoing covered by this policy; and,
 - 2.1.2 set out a procedure by which KCA Deutag personnel can raise concerns to us without fear of reprisals.

3 WHAT IS WHISTLEBLOWING?

- 3.1 Whistleblowing is the disclosure of information which relates to certain types of suspected wrongdoing or danger in the workplace.
- 3.2 Those who raise a concern under this policy are protected from being subjected to any detriment or unfairly dismissed as a result.

4 WHAT CONCERNS ARE COVERED BY THIS POLICY?

- 4.1 Certain types of concerns are given legal "whistleblowing" protection. It is those concerns that fall within the scope of this policy.
- 4.2 KCA Deutag personnel should use this policy to report concerns within KCA Deutag which they reasonably believe:
- 4.2.1 fall within the categories outlined at 4.3 below; and
 - 4.2.2 that there is a public interest in disclosing (because it affects or could affect, for example, customers, suppliers or third parties, members of the public or other KCA Deutag personnel). In this policy, a "third party" means: (i) any individual who is not an employee of KCA Deutag, and (ii) any organisation other than KCA Deutag.
- 4.3 The categories of concern that are within the scope of this policy are:
- 4.3.1 a criminal offence has been committed, is being committed, or is likely to be committed;
 - 4.3.2 a person or organisation has failed, is failing, or is likely to fail to comply with their legal obligations;
 - 4.3.3 a miscarriage of justice has occurred, is occurring, or is likely to occur;
 - 4.3.4 the health and safety of any individual has been, is being, or is likely to be endangered;
 - 4.3.5 the environment has been, is being or is likely to be damaged; or
 - 4.3.6 any of the above are being, or are likely to be, deliberately concealed.
- 4.4 Examples of issues that might be raised under this policy could include: conflicts of interest; negligence, fraud, bribery, money laundering, facilitation of tax evasion, environmental damage or risk; harassment of others; and health and safety breaches.

5 WHAT ISSUES ARE NOT COVERED BY THIS POLICY?

- 5.1 Concerns that do not fall into the categories set out at section 4.3 cannot be raised under this policy.
- 5.2 This policy is not intended to be used to raise grievances or as an appeal mechanism for other procedures.
- 5.3 This policy does not affect KCA Deutag personnel's duty to make a notification in certain circumstances – see section 11.

6 HOW SHOULD A CONCERN BE RAISED?

- 6.1 KCA Deutag personnel who wish to raise a concern under this policy, where possible, should notify their line manager. If this is not possible, KCA Deutag personnel can raise a concern under this policy with any member of the Legal & Compliance team, the Human Resources team, Internal Audit or any other senior member of staff.
- 6.2 Alternatively, KCA Deutag personnel can raise a concern under this policy via any of OUR SPEAK-UP CHANNELS hosted by our confidential independent whistleblowing provider, Safecall. Reports can be made via Safecall, 24 Hours a day, seven days a week, by:
- 6.2.1 Email: KCAD@safecall.co.uk
 - 6.2.2 Online: www.safecall.co.uk/report
 - 6.2.3 Telephone ([see appendix for contact numbers](#))
- 6.3 Concerns should be raised under this policy as soon as is practical. This helps KCA Deutag to uphold our high standards and to ensure any investigation is fair and comprehensive.

7 INVESTIGATION OF A CONCERN

- 7.1 KCA Deutag is committed to investigating concerns raised under this policy fully, fairly, promptly and confidentially, where circumstances permit.
- 7.2 Reports will be reviewed by an Investigations Steering Group consisting of the Group General Counsel, Head of Compliance and other senior member of the KCA Deutag team. They will usually carry out an initial assessment of the concern to determine whether there are grounds for further investigation to take place.
- 7.3 The identity of the investigator(s), and the length and scope of the investigation will depend on the subject matter of the concern raised under this policy.
- 7.4 So far as appropriate and practicable, and subject to KCA Deutag's confidentiality obligations, those who have raised a concern under this policy will be kept informed of the progress of an investigation.
- 7.5 Following the investigation, a report will be produced. In certain circumstances, it may be possible to share all, or excerpts, of the report with the personnel who raised a concern under this policy.
- 7.6 Any investigation arising from a concern raised under this policy will consider whether to recommend changes to workplace practices. The conclusions of the investigation may also inform other action by KCA Deutag (e.g. in relation to other KCA Deutag personnel or third parties).

8 CONFIDENTIALITY

- 8.1 Where a concern is raised under this policy, KCA Deutag will normally seek to keep the identity of the personnel who raised a concern under this policy confidential. In order not to jeopardise any investigation, the personnel who raised a concern under this policy will be expected to keep the fact that they have raised a concern under this policy, the nature of the concern and the identity of those involved confidential.
- 8.2 There may be circumstances in which, because of the nature of the investigation or concern raised, it will be necessary for KCA Deutag to disclose the identity of the personnel who raised a concern under this policy, or other information arising from the investigation, within or outside KCA Deutag.
- 8.3 KCA Deutag may also refer a concern to an outside body, such as a regulator or law enforcement.
- 8.4 Any disclosure or referral by KCA Deutag will be in accordance with its data protection obligations.

9 NON-RETALIATION

- 9.1 Personnel who raise concerns under this policy which they reasonably believe to be true must not suffer any detrimental treatment as a result. KCA Deutag takes a zero-tolerance approach to retaliation or other mistreatment of personnel who have raised a concern under this policy.
- 9.2 If KCA Deutag personnel raise a concern under this policy and believe that they are being subjected to a detriment within KCA Deutag as a result, they should where possible, notify their line manager. If this is not possible, they should report this to any member of the Legal & Compliance team, the Human Resources team, Internal Audit or any other senior member of staff immediately.
- 9.3 KCA Deutag personnel who victimise or retaliate against others who have raised concerns under this policy may be subject to disciplinary action up to and including termination of employment.
- 9.4 If an investigation concludes that a concern has been raised maliciously, vexatiously or with a view to personal gain, those responsible may be subject to disciplinary action up to and including termination of employment.

10 DUTY TO MAKE A NOTIFICATION

- 10.1 This policy does not affect KCA Deutag personnel's obligation to notify their line manager (or if this is not possible, any member of the Legal & Compliance team, the Human Resource team, Internal Audit or any other senior member of staff) if they consider: (i) they, (ii) other KCA Deutag personnel, or (iii) a KCA Deutag supplier may have breached:
- 10.1.1 the law,
- 10.1.2 this policy, or

10.1.3 any applicable KCA Deutag policy, procedure or guidance.

11 NON-COMPLIANCE

- 11.1 KCA Deutag may take appropriate disciplinary action, up to and including termination of employment, against any personnel who fail to comply with applicable laws, this policy or any applicable KCA Deutag policy, procedure or guidance.
- 11.2 In addition to its internal processes, KCA Deutag may refer any concern regarding personnel to law enforcement and/or regulators.

APPENDIX – SAFECALL CONTACT NUMBERS

Location	Contact Number
Algeria	+44 191 516 7764
Angola	+44 191 516 7764
Azerbaijan	+44 191 516 7788
Albania	+44 191 516 7758
Brunei	+44 191 516 7753
Canada	1 877 599 8073
Cyprus	00800 7233 2255
France	00800 7233 2255
Gabon	+44 191 516 7764
Germany	00800 7233 2255
Iraq	+44 191 516 7756
Ivory Coast	+44 191 516 7764
Kazakhstan	8800 3333499
Kurdistan	+44 191 516 7758
Libya	+44 191 516 7756
Lichtenstein	+44 191 516 7751
Malaysia	1800 220 054
Mexico	01 800 123 1758
Netherlands	00800 7233 2255
Nigeria	+44 191 516 7764
Norway	00800 7233 2255
Oman	800 72323
Pakistan	00800 9004 4036
Poland	00800 7233 2255
Portugal	00800 7233 2255
Russia	810 800 7233 2255
Sakhalin	810 800 7233 2255
Singapore	800 448 1773
Spain	00800 7233 2255
UAE	8000 441 3376
UK	0800 915 1571
USA	1 866 901 3295