

Shelf Drilling EthicsPoint Helpline

Data Privacy Notice

1. Data privacy regulations of some countries require that Shelf Drilling, Ltd., and its subsidiaries and affiliates (collectively “Shelf Drilling”) notifies the person making a report of certain collection and retention practices, and that the reporter accepts the terms and conditions for the use of the reporting service. For us to accept any information through this reporting system, you must read and acknowledge the terms contained below. If you have any questions, we suggest you report this matter directly to your supervisor or local management or a representative of the Human Resources, or Legal & Compliance Departments.
2. Country-specific privacy notice, if any provided, will take precedence over this notice, in the event of any conflict between the two.

General

3. The EthicsPoint is a web and phone-based intake system operated by NAVEX Global and provided by Shelf Drilling to its employees, vendors, suppliers and business partners and those of its subsidiaries (“Reporters”) for asking questions and reporting suspected violations of laws or regulations, or our Code of Business Conduct and Ethics or other company policies.
4. In certain countries, EthicsPoint may also be used to report suspected violations of other matters. It and the database in which the personal data and information that you may report is stored, are operated by NAVEX in the United States.
5. You may contact Shelf Drilling at privacy@shelfdrilling.com with any questions relating to this Notice or EthicsPoint.
6. To proceed further, you must read this notice in its entirety and, check the I ACKNOWLEDGE box. You will then be able to submit a report or question using EthicsPoint. If you do not provide your acknowledgement, you will not be able to submit a report or question through EthicsPoint. If you are a Shelf Drilling employee you should contact your supervisor or local management or a representative of the Human Resources, or Legal & Compliance Departments to report the matter.

Use of EthicsPoint

7. Use of EthicsPoint is entirely voluntary. You are encouraged to report possible violations directly to your supervisor or local manager, or to a representative of the Human Resources, or Legal & Compliance Departments, depending on the nature of the possible violation. If you feel that you are unable to do so, you may use EthicsPoint to make your report.
8. EthicsPoint is a confidential online reporting system that allows you to report suspected violations of law or company policies, as well as other concerns you may have, to Shelf

Drilling. In certain countries, Shelf Drilling may only accept reports through EthicsPoint on limited topics, generally restricted to financial, accounting, auditing, bribery, competition law, discrimination and harassment and environment, health, hygiene, and safety matters. If your concern pertains to a matter that, under local law, may not be accepted by Shelf Drilling through EthicsPoint, you will need to contact your supervisor or local management or a representative of the Human Resources, Legal & Compliance Departments to report the matter.

9. Please be aware that the information you supply about yourself, your colleagues, or any aspect of the company's operations may result in decisions that affect others. Therefore, we ask that you only provide information that you believe is true. You will not be subject to retaliation from Shelf Drilling for any report of a suspected violation that is made in good faith, even if it later turns out to be factually incorrect. Please be aware, however, that knowingly providing false or misleading information will not be tolerated. The information you submit will be treated confidentially except in cases where this is not possible because of legal requirements or in order to conduct an investigation, in which case the information will be handled sensitively. We encourage you to identify yourself in order for us to follow up with questions we may have.

What personal data and information is collected and processed?

10. EthicsPoint captures the following personal data and information that you provide when you make a report: (i) your name and contact details (unless you report anonymously) and whether you are employed by Shelf Drilling; (ii) the name and other personal data of the persons you name in your report if you provide such information (i.e.: description of functions and contact details); and (iii) a description of the alleged misconduct as well as a description of the circumstances of the incident. Note that depending upon the laws of the country in which you are residing, the report may not be made anonymously; however, your personal information will be treated confidentially and will only be disclosed as set out below.

How will the personal data and information be processed after your report and who may access personal data and information?

11. The personal data and information you provide will be stored in a database which is located on servers hosted and operated by NAVEX. In addition, all information you provide may be stored by Shelf Drilling in the course of answering your question(s) or investigating the report. NAVEX has entered into contractual commitments with Shelf Drilling to secure the information you provide in accordance with applicable law. Both NAVEX and Shelf Drilling are committed to maintaining stringent privacy and security practices including those related to notice, choice, onward transfer, security, data integrity, access, and enforcement.
12. Shelf Drilling will evaluate the information you provide, and may conduct appropriate investigations, and take corrective action. For the purpose of processing and investigating your report and subject to the provisions of local law, the personal data and information you provide may be accessed, processed, stored, and used by the relevant personnel of Shelf Drilling, including Human Resources, Finance, Internal Audit, Legal & Compliance, management, external advisors (e.g., legal advisors), or, in limited circumstances, by technical staff at NAVEX. Those individuals may be located anywhere around the world.

13. Personal data and information you provide may also be disclosed to the police and/or other enforcement or regulatory authorities. The relevant bodies that receive and process personal data can be located in another country that may not provide the level of data protection as available in your jurisdiction.
14. The personal data you provide will be kept, in accordance with applicable law, as long as necessary to process your report, or, if applicable, as long as necessary to initiate sanctions or to meet our legal or financial obligations.
15. For more information on how we process your personal data generally click [here](#) if you are an employee and click [here](#) if you are anyone else.

Accessing information concerning the report

16. Shelf Drilling will promptly notify any person who is the subject of a report to EthicsPoint except where notice needs to be delayed to ensure the integrity of the investigation and preservation of relevant information.
17. With some exceptions, the subject of the report may access information concerning the report (with the exception of the identity of the reporter) and request correction of personal data that is inaccurate or incomplete in accordance with applicable law. Similarly, with some exceptions, reporters may also access information about the report and request corrections of their personal data in accordance with applicable law. To make any such corrections, please contact the Legal & Compliance team.

Special country regulations

18. In some jurisdictions (such as much of the European Union and surrounding areas), reports can only be made relating to limited topics, typically accounting, auditing, bribery, competition law, discrimination and harassment and environment, health, hygiene, and safety matters. Further, some countries restrict reports such that only employees in key or management functions may be the subject of a report.
19. Any issues or concerns relating to topics not permitted by law to be reported via EthicsPoint should be reported directly to your Manager or Supervisor or a representative of the Human Resources, Legal or Corporate Compliance Departments as appropriate for the subject matter of the possible violation. In some countries, anonymous reports may not be permitted under the law except under extremely restrictive circumstances.

Changes to this Privacy Notice

20. This Privacy Notice may be changed over time. This Privacy Notice was last updated on 05 October 2023.