

# ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

At KCA DEUTAG, we are committed to operating ethically and responsibly. All our people have a duty to avoid conflicts of interest and adhere to local and international regulations. We believe in the importance of establishing mutually beneficial relationships and insist on honesty, integrity and fairness in all our dealings.

We do not tolerate, permit or engage in bribery, corruption or improper payments of any kind in our business dealings, anywhere in the world, both with public officials and people in the private sector. This includes 'facilitation payments', which are payments to induce officials to perform routine functions they are anyway obliged to perform.

We make the following commitments;

- We will not give, offer or promise money, gifts, entertainment or anything of value to a third party in order to get them to do something improper.
- We will not give, offer or promise any advantage to a public official that they are not entitled to receive
- We will not use third parties associated with us to commit acts of bribery
- We will understand who we are doing business with and avoid those who do not share these commitments
- No employee shall suffer adverse consequences for refusing to pay a bribe, even if it may result in KCA Deutag losing business
- We will apply financial discipline and keep accurate books and records so that payments are honestly described and company funds are not used for unlawful purposes

We shall achieve these commitments and objectives through the operation of a robust anti-bribery and anti-corruption system overseen by senior management in their area of responsibility.

As Chief Executive, I will ensure that KCA DEUTAG's senior management provide the leadership, resources, support and direction necessary to ensure this.

In turn, all KCA DEUTAG employees, directly contracted staff, and associated persons are responsible for:

- Not making, offering, accepting or asking for bribes or facilitation payments
- Understanding and complying with our anti-corruption policies, standards and procedures
- Reporting concerns to line management, senior management, the Head of Compliance or our confidential reporting service

I ask all employees to recommend improvements to this policy and associated systems of work such that our objectives are assured.



Norrie McKay  
Chief Executive Officer