



Compliance Hotline Reporting and Investigation Procedure

Follow up of Whistleblowing – Handling of Reports



1. Introduction

This *Compliance Hotline Reporting and Investigation Procedure* (the "Procedure") outlines the process for how PGS ASA and its subsidiaries ("PGS") manages reports received on the PGS Compliance Hotline (the "Hotline"). The Hotline is available on pgs.com. This website details how to report, data security, encryption, confidentiality, and the right to remain anonymous. This Procedure may also guide the management of other concerns reported to PGS management.

2. Receipt of Reports

PGS will promptly review and appropriately investigate reports and allegations received in the Hotline ("Reports") by following the steps described in this Procedure. PGS' Compliance & Internal Audit department ("C&IA") are informed of each new Report received through the Hotline.

3. Investigation process

3.1 Assess Report

Upon receipt of a Report, this shall be logged in the internal compliance incident folder. The Report shall be initially assessed using a template prepared by C&IA. Thereafter, the following steps shall be taken:

- a) the urgency shall be assessed by considering factors such as:
 - The need for immediate action to prevent an incident occurring or to reduce any material consequences
 - any short-term deadlines that must be kept, e.g., the 72-hour deadline for reporting data protection breaches
 - the severity of the allegation
- b) the risk level shall be assessed by considering factors such as:
 - The seriousness of any damage (actual or potential) to persons or entities involved (either internal or external)
 - the seniority of any managerial personnel involved
 - the extent of which laws and regulations may have been violated
- c) the need for legal advice shall be assessed in cooperation with PGS' General Counsel
- d) C&IA shall together with the PGS General Counsel, and as appropriate the SVP Global HR, assess whether the Report is (a) a genuine compliance incident related to a suspected breach of law or PGS policies and principles, or (b) a complaint about an employee's own employment. In case of a complaint, the reporter will be informed accordingly and given guidance as to where to further pursue the complaint if relevant.

3.2 Take Immediate Actions and Plan Next Steps

Any immediate actions shall be taken where needed in order to prevent an incident occurring or to reduce any material consequences of an incident.

The next steps shall be determined, and actions started as necessary, including the need for any initial interviews or meetings or other information gathering.

3.3 Inform Stakeholders

As soon as possible, feedback shall be given to the person (if named) handing in the Report. Feedback shall include:



- Confirmation that the Report has been received and initially assessed
- the planned next steps
- the timetable for further work
- a plan for further feedback to the reporter

Other stakeholders will be informed, depending on the materiality of the case and taking anonymity of the reporter into account, as follows:

- The PGS' Chief Compliance Officer ("CCO") and General Counsel shall be informed of each new Report
- the PGS' CEO, and as appropriate SVP Global HR, will be informed of any Report which after an initial assessment is considered material
- the Chairperson of the Board's Audit Committee shall be informed of any Report involving a member of the PGS senior management
- the Audit Committee may, depending on the severity of the Report, be informed upon receipt of any Report or during the investigation
- the supervisor or department head of the reporter may be informed
- local authorities

If any of the above internal persons are accused or targeted personally in the Report, they shall be excluded from the above information flow.

3.4 Prevent retaliation

Although PGS prohibits any form of retaliation against whistleblowers, the risk of retaliation shall be considered. If the inherent risk is deemed elevated, the CCO shall highlight this to the PGS General Counsel and SVP Global HR. They will identify any additional measures to implement in order to protect the whistleblower's legal rights against retaliation.

3.5 Determine Need for Full Investigation

C&IA shall determine if a full investigation is necessary or if a simplified process can be conducted.

For cases where it is determined that a full investigation is necessary, the investigation shall be planned and carried out according to the process described below. For complex cases requiring detailed investigation, the TopSet Methodology may be used.

3.5.1 Plan Investigation

The following steps shall be included in the planning phase:

- Determine and agree the scope and mandate for the investigation
- appoint an investigation leader and team
- appoint a mentor if required
- determine any need for external support, or if the investigation should be performed externally
- notify the relevant stakeholders and persons concerned
- develop a plan/timetable for the investigation

3.5.2 Conduct the Investigation

The following steps shall be included in the investigation phase:



- Breakdown the plan into more detailed activities and develop an investigation work program
- perform the investigation according to the work program,
 - including conducting interviews,
 - access and review documentation
 - evaluate evidence
 - analyze findings
- develop draft conclusions
- prepare a draft report
- verify the draft report

During the investigation, the anonymity of the reporter shall be safeguarded as appropriate. The investigation team shall involve the CCO and/or mentor wherever appropriate. Key documents shall be logged, and interviews shall be documented in line with templates kept by C&IA.

3.6 Recommend Actions/Disciplinary Sanctions

Where it is concluded that any PGS personnel has violated PGS rules, principles or applicable law, the type of violation should be categorized, and the recommended level of any disciplinary sanctions determined by PGS' CEO and/or relevant EVP together with SVP Global HR and General Counsel (unless being accused or targeted personally in the Report). Also, PGS will determine whether to contact or report the matter to local authorities for further investigation. Internal sanctions can be modified due to judgmental considerations. Any other proposed actions shall be included in the investigation report.

3.7 Approve Report and Implement Recommendations

The investigation report shall be approved by the CCO and distributed to the relevant line managers who shall conclude on the actions and sanctions recommended. Any deviations from the recommendations shall be documented. PGS Management is responsible for the implementation of all actions and sanctions.



4. Close the case

4.1 Provide Feedback

In general, distribution of an investigation report or summaries thereof shall be kept to a minimum and will include only the necessary limited PGS stakeholders and local authorities. The investigation report shall not be distributed further. In certain cases, the dissemination of information needs to be specifically regulated and therefore a higher level of information security may be used. The recipients of the investigation report will be informed of any restrictive policy on a case-by-case basis.

Feedback in the form of a case summary shall be provided to the reporter as appropriate and as agreed. Feedback to the reporter shall be given in cooperation with the PGS General Counsel.

PGS stakeholders shall be informed as follows:

- Relevant members of PGS senior management will receive a copy of the investigation report
- the PGS Board's Audit Committee will, depending on the severity of the case, receive either a full investigation report or a summary thereof
- the supervisor or department head of the reporter shall be informed
- heads of other involved departments may be informed if necessary
- local authorities

The anonymity of the reporter shall as appropriate be protected in the investigation report. If any of the above internal persons are accused or targeted personally in the Report, they shall be excluded from the distribution list.

4.2 File Documentation

The final investigation report together with all supporting documents shall be appropriately archived. All investigation documents are to be kept for the duration set forth in the *PGS Personal Data Manual and Binding Corporate Rules*. Disposal of documents shall be approved by the CCO.

4.3 Follow-up and Verification of Implementation

The CCO shall in due course initiate de-briefing activities to ensure that (a) agreed actions and sanctions have been properly and timely implemented; and (b) that no form of retaliation has been observed.