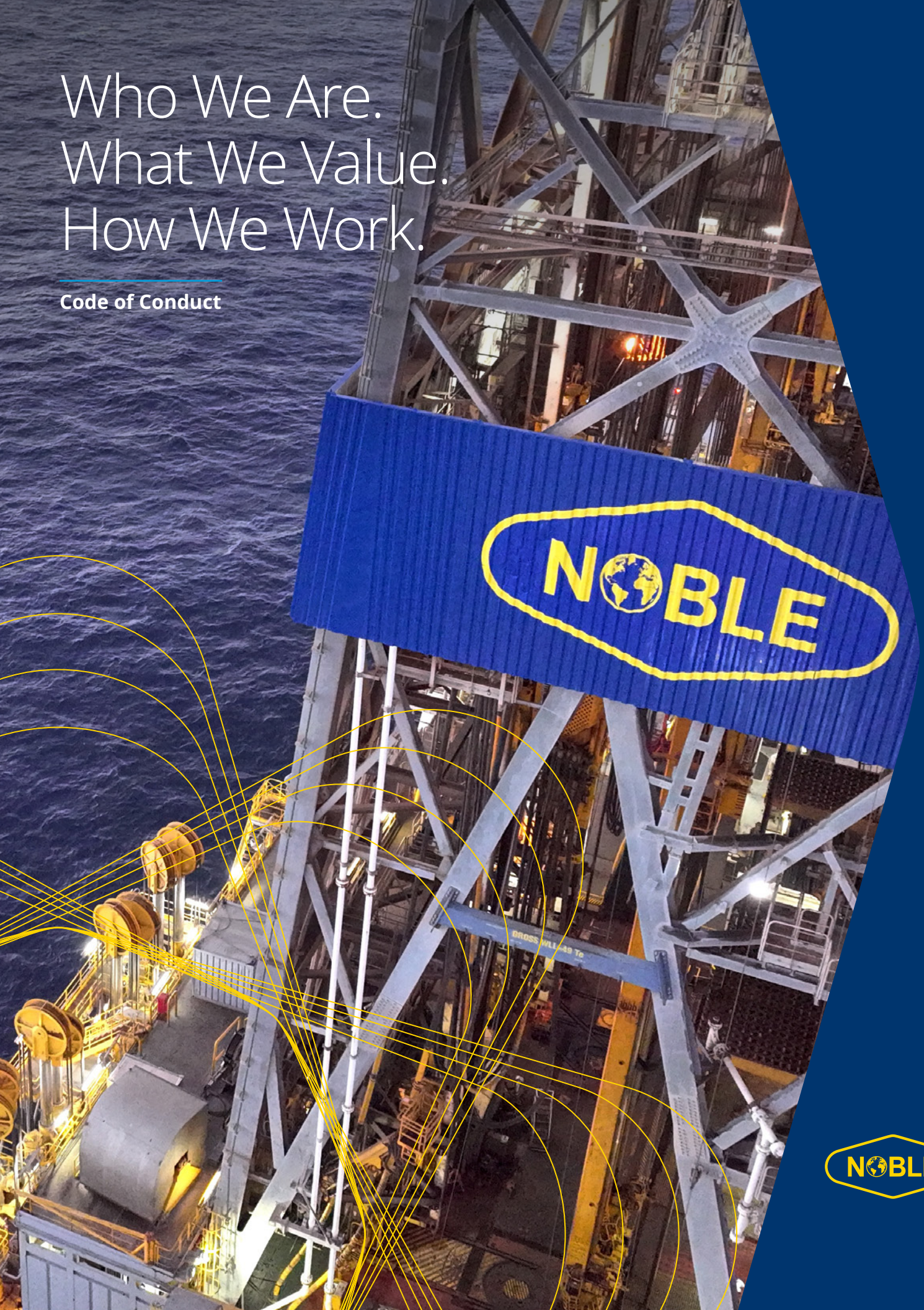
# Who We Are.
# What We Value.
# How We Work.

**Code of Conduct**



## The Noble Code and Why it Matters

**Our Code of Conduct (the "Noble Code" or the "Code") sets the standards for our business and activities and applies to all members of the Noble community in every country where we operate. The Noble community includes all Noble employees, executives, officers, our Board of Directors, and business partners, including suppliers, contractors, and others who represent or provide services on our behalf.**

**Adhering to the Noble Code reflects our personal commitment to earning and sustaining the trust of our customers, shareholders, and employees through the execution of every business transaction.**

# First Choice Offshore.℠

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# Letter from the CEO

**For more than a century, Noble's reputation has been built by exceptional people who consistently demonstrate a commitment to excellence and a dedication to the Company. Looking ahead, Noble's strategy will forge new pathways to success.**

Our customer-focused attitude and superior operational execution have positioned Noble as an industry leader in the offshore drilling sector. Our track record and leadership are evidence of the solid foundation upon which the Company has been built. I am proud of the culture we have created and am privileged to have the opportunity to lead a Company whose legacy lives on each day in our people and the way we conduct ourselves and our business.

Our Vision, Mission and Core Values guide the way we serve our customers, employees, and shareholders, and how we ultimately execute our strategy successfully. As we pursue our shared goals and take on the challenges ahead, we must always approach the tough situations we face every day with the utmost transparency and decency. Our collective ethical behavior in all situations is paramount; put simply, always do the right thing.

This Code of Conduct is designed to reinforce the deep commitments we have made historically and for our future, and it is intended to give direction and support for our duty, our people, our community and our world.

Thank you for being a part of our team and going above and beyond to continue the Noble legacy of excellence and reliability. Together, we will earn our position as First Choice Offshore.SM

Robert Eifler

President and Chief Executive Officer

# Our Mission

Drilling to power the world responsibly.

# Our Vision

We strive to be the leading offshore driller by being the first choice for employees, customers, and investors.

# Our Values

Throughout our vast history, Noble has continuously operated with standards and beliefs that reflect what we value, what we stand for, and what makes us unique. Our values reflect the foundation of our culture and impact every decision we make—both small and large.



## Navigate With Integrity

***Be Honest and Do the Right Thing.***

## Own Your Actions

***Take Responsibility, Ensure Safety, and Follow Through.***

## Be Respectful

***Value Every Voice and Treat Others The Way You Want To Be Treated.***

## Listen, Learn, Lean In

***Seek to Understand, Collaborate, Learn Continuously, and Commit to the Path Forward.***

## Excel In Everything We Do

***Go Above and Beyond, Strive for Quality, and Continuously Improve.***

# Who We Are

# Who We Are

**ROLES AND RESPONSIBILITIES**

**The Noble Code unites our community from diverse locations and cultures under a common vision. It acts as our compass for conducting business ethically, safeguarding our employees, assets, and reputation, as well as the communities and environments in which we operate.**

## Responsibilities

The Noble Code requires every member of the Noble community to know, understand, and comply with all parts of the Noble Code. Members must understand their job responsibilities, the risks they present, and how to manage those risks. The Code also requires everyone to speak up if they suspect a violation of the law, the Code, or Noble's policies. Ask questions. Raise concerns. Our community is our first line of defense. When the behavior of Noble employees or third parties conducting business with Noble, does not align with the Noble Code, it is our responsibility to speak up.

At Noble, we regularly train our community on the Code and the various subjects it covers. We require every member of the community to complete all Code-related training within the required time-period. Failure to complete all training may result in discipline up to and including termination of employment.

## Consequences for Non-compliance

The Noble Code is comprised of essential rules all members of our community must follow. Failure to comply with the Noble Code, as well as other company policies and procedures, may result in disciplinary action, including termination. Violations may also subject employees to legal action, fines, or imprisonment by relevant authorities.

## Guidance

We understand that the right path is not always clear. While the Noble Code cannot provide answers to every question or address every possible situation, it offers valuable guidance to help navigate these situations. If in doubt, employees should seek guidance from their supervisor, manager, or the Ethics & Compliance department. Employees can also refer to the company's policies on P2R, Noble's internal management system, or contact the NobleLine.

## Our Ethical Decision-Making Model

Challenging workplace situations should be handled ethically. When making decisions, information is crucial. So, employees should first consult the Noble Code and Noble's policies. You can also reach out to your supervisor or manager, the Ethics & Compliance department, the Legal department or the NobleLine for guidance.

Once you have come to a decision, test it against the following questions to determine if your course of action is ethical and aligns with Noble's values.

### Ethical Decision-Making Model

1. Is this action legal and socially responsible?
2. Does this action comply with both the spirit and the letter of the Noble Code?
3. Does this action align with Noble's values?
4. Would I be proud of my actions if they became known within the company or publicly?

***Remember, the Noble Ethics & Compliance department is always available to assist you with these types of decisions.***

## Voicing Your Concerns

When someone violates the Noble Code, it affects us all as a community and as a business by eroding trust among our team, shareholders, customers, and others. We are all the eyes and ears of the business. To maintain our wellbeing and thrive, it is essential that we report any suspected violations of the Noble Code, Noble policies, or the law. Speaking up promptly is key to upholding our standards and values.

If you suspect or become aware of a violation of a Noble policy or law by another member of the community, do not hesitate to voice your concerns. Violations may be reported by contacting the NobleLine at:
https://nobleline.noblecorp.com

**Employees may call or submit a report to the NobleLine 24 hours a day, 7 days a week.**

Callers with a United States phone number may dial 1-855-4NOBLELINE.

All other callers may dial 1-346-4NOBLELINE and reverse the toll charges or visit https://nobleline.noblecorp.com to obtain the toll-free number for your country

The Ethics & Compliance department is also available to answer any questions you may have about the Noble Code, and Noble's policies or procedures, and to assist with any situations you may encounter. You can contact the department via email at:
ethics@noblecorp.com

## Reporting Safely

**We value the honesty and cooperation of our community and will safeguard them against retaliation.**

At Noble, we protect from retaliation those who speak up in good faith or cooperate with an investigation. Noble does not tolerate retaliation in any form, including discipline, firing, demotion, transfers, intimidation, or other demeaning actions. Retaliation can come from anyone, whether a manager or an employee, and those who engage in it will face disciplinary action, up to and including termination. Acts and threats of retaliation should be reported immediately.

If you believe you have experienced retaliation, reach out to the Ethics & Compliance department, Human Resources or the NobleLine for help. Your wellbeing and rights are important to us.



## The Noble Line

The NobleLine allows you to report issues anonymously in any language. It is a resource for employees and others worldwide to ask questions and raise concerns about ethics, the environment, safety, or other matters that might not be resolved through regular channels. You can access the NobleLine online or by phone, 24 hours a day, every day of the week, toll-free for your convenience.

## File a Report Online

Visit https://nobleline.noblecorp.com/ and follow the directions. The link is also available on posted materials in our workplaces, or online on Noble's website and intranet.

## Or Call to File a Report

**Calling from the United States**

Call toll-free at 1-855-4NOBLELINE

**Calling from Outside the United States**

Callers with a United States phone number may dial 1-855-4NOBLELINE.

All other callers may dial 1-346-4NOBLELINE and reverse the toll charges or visit https://nobleline.noblecorp.com to obtain the toll-free number for your country.

## Reporting a concern or complaint?

- Provide as much detail as possible.
  - Assume Noble has no prior knowledge of the facts leading up to your report or complaint.
- Decide if you want to remain anonymous.
  - If you choose to remain anonymous, your identity will never be revealed to Noble.
  - If you choose to identify yourself, your identity will remain confidential unless disclosure is required by law.
- Follow up on your concern or complaint.
  - Reporters who file reports via telephone or the web are assigned a report key, a unique identifier assigned to their concern or complaint, which can be used to check the status.
  - If you reported anonymously, you may also anonymously access, ask, and answer follow-up questions from the Noble investigator, if comfortable doing so.

  *Following up is especially important for anonymous reporters, as it is the only way investigators can ask questions to assist with the investigation.*

The resolution of a concern or complaint will be kept confidential.

**Q: I witnessed a colleague engage in behavior that I believe may violate the Noble Code. Should I file a report?**

A: Absolutely. It is the responsibility of every employee to report any possible violations of the Noble Code. Employees can report the suspected violation to their supervisor or via the NobleLine. Noble employees are encouraged to report any suspected violations. It is better to be mistaken about a violation than to overlook an actual breach of the Noble Code or local law. The NobleLine is not only for reporting issues, but it also allows employees to ask questions and gain clarity before making any ethical errors. Asking questions, rather than making assumptions, protects you, your colleagues, and Noble. Remember, those who speak up in good faith will be protected from retaliation.

**Q: What if I see a violation of the Noble Code but don't feel comfortable reporting it to my supervisor?**

A: Noble employees are obligated to report any possible breaches of the Noble Code. Failing to report unethical behavior can lead to consequences similar to the violation itself. If you do not feel comfortable reporting to your supervisor, you should contact Human Resources, the Ethics & Compliance department, or file a report using the NobleLine. Employees have the option to file anonymous reports using the NobleLine.

Our people are our priority. At Noble, we aim to create and sustain a workplace culture where employees feel empowered. We achieve this by valuing their contributions, listening to their needs, and offering opportunities for growth. By investing in our people, we strive to ensure that Noble continually earns the position of First Choice for Employees.

# What We Value

# What We Value

## A Fair and Respectful Workplace

Noble acknowledges the importance of workforce inclusion and its transformative effect on our global employee base. A well-rounded team brings a wealth of ideas, experiences, processes, and perspectives, which fosters creativity and innovation. We prioritize a fair and respectful working environment for all employees.

## Equal Employment Opportunities

Noble is an equal opportunity employer that strictly prohibits any form of unethical or illegal discrimination. Discrimination not only undermines our commitment to a respectful workplace but may also violate laws in countries where we conduct business. Noble is dedicated to treating all applicants and employees fairly, ethically, respectfully, and with dignity.



## Fostering Respect in the Workplace: Our Commitment to Each Other

At Noble, we are committed to looking out for one another. Whether in the office or out at sea, we believe everyone deserves a workplace that is healthy, sustainable, and free from any form of violence or harassment. Harassment, which includes any behavior—verbal, non-verbal, or otherwise—that belittles or shows hostility toward an individual or a group, violence and threatening behavior are violations of the Noble Code.

**Harassment includes a range of behaviors, including:**

### What we say or write.

Words, whether spoken or written, while representing Noble officially or unofficially (by displaying Noble logos or mentioning Noble) in person or on social media, may not include racial, ethnic, or gender-based slurs, jokes, stereotypes, or any abusive or offensive language.

### What we display.

Images containing inappropriate content, such as pornographic or sexually suggestive photos, drawings, images, or objects, as well as potentially offensive slogans, posters, or stickers, are not allowed on Noble property, including online.

## What we do.

Physical actions such as unwelcome touching, making sexual advances, hazing, or engaging in bullying are violations of the Noble Code and subject to discipline.

**Any Noble employee subjected to harassment should report the concern immediately to a supervisor, senior manager, or the Ethics & Compliance department.**

Nondiscrimination and Anti-Harassment Policy

### Open Door Policy

At Noble, we prioritize honest and open communication by encouraging all employees to speak with their supervisors if they have questions or concerns. These informal conversations make up our Open Door Policy. They allow us to address issues promptly and help management make decisions in the best interests of our employees. Noble takes every discussion seriously and is committed to finding swift solutions. Clear and honest communication is essential to maintaining and promoting a respectful workplace.

### Creating A Safe and Healthy Workplace

We protect our people's wellbeing not only by implementing robust safety measures, but also by prioritizing their physical and mental health.



### Alcohol and Drugs

To ensure a safe, healthy, and efficient work environment, Noble prohibits certain substances and their use in our facilities and in those of our customers, including offices, warehouses, and rigs. Detailed information, including lists of banned substances, is available on P2R. Employees are responsible for familiarizing themselves with this list and ensuring compliance at all times.

Drug, Alcohol, and Prohibited Items Policy

## Prioritizing the Well-being of Our Employees

Noble provides a variety of programs and services aimed at promoting physical wellness through diet, exercise, and stress management. Additionally, Noble offers programs focused on employee mental health. These employee assistance programs include counseling, financial planning, attorney assistance, paid time off, leave programs, and a range of other benefits. We continuously work to expand our programs to ensure our people can make positive choices. Noble also actively monitors global and regional health trends in the diverse areas where we live and work to enhance our health and safety programs and identify high-quality, cost-effective health services and support programs.

## Safeguarding Our Employees

Our people are our most valuable assets, and their safety is our highest priority. Implementing robust safety measures is not only the right thing to do but is also good business. Protecting our workforce creates value for our employees, customers, and shareholders while ensuring the sustainability of our operations.

Nothing is more important than ensuring everyone returns home safely. At Noble, we promise to support you in your work and provide you with the necessary tools, including the absolute authority to stop work. Every individual is empowered to speak up and halt any unsafe behavior or actions. If an employee notices a situation that could endanger people or the environment, they have the authority to stop it immediately.

## Uplifting Our Partners, and Community

Long-term business success hinges on maintaining strong relationships. Noble is committed to fostering lasting, positive relationships with our host communities and local stakeholders by acting as responsible neighbors and partners. We make meaningful contributions to society and seamlessly integrate sustainable corporate and social development into our business principles. Noble has a long-standing history of active involvement in development and charitable activities.

## Human Rights

At Noble, we recognize the significance of upholding human rights in all our operations. We are dedicated to protecting human rights and ensuring our business partners and suppliers share this commitment.

**"Stop Work Authority is a right, a duty, and at Noble, an unwavering expectation from each of you."**

**Robert Eifler, CEO**

**Q: My supervisor makes jokes during meetings about my religious beliefs. What should I do?**

A: If you experience or witness harassment at work or from other members of our community, you should report it immediately to your supervisor, senior manager, or the Ethics & Compliance department. You can also use the NobleLine to report the incident anonymously if you prefer. It is important to speak up to ensure a safe and respectful workplace for everyone.

**Q. Will I face retaliation for reporting harassment?**

A: No, Noble strictly prohibits retaliation against anyone who reports harassment in good faith or cooperates with an investigation. Retaliation can include discipline, firing, demotion, transfers, intimidation, or other demeaning actions. If you believe you have experienced retaliation, you should contact the Ethics & Compliance department, Human Resources, or the NobleLine for assistance.

**Q: How does Noble support employees experiencing mental pressure?**

A: Noble is committed to supporting employees experiencing mental pressure by offering a range of wellness programs focused on mental health. These programs include counseling, stress management workshops, and resources for maintaining a healthy work-life balance. Employees are encouraged to utilize these services to manage stress and improve their overall well-being. Assistance in accessing these services may be obtained by contacting Human Resources.

**Q: What should I do if I suspect a colleague is under the influence of drugs or alcohol at work?**

A: If you suspect a colleague is under the influence of drugs or alcohol at work, you should report your concerns immediately to your supervisor or manager. You can also contact the Ethics & Compliance department or use the NobleLine to report the situation anonymously if you prefer. It is important to address such issues promptly to maintain a safe workplace.

## Third Party Standards

Noble mandates that all contractors, suppliers, and agents performing work for Noble adhere to the principles of the Noble Code, either by complying with a code that encompasses these principles or by adopting the Noble Code. Noble's standard contractual Terms & Conditions require these third parties to comply with Noble's anti-corruption, health and safety, environmental, labor and human rights requirements. Our human rights requirements include a commitment to ensure the absence of slavery and human trafficking in any part of business operations or the supply chain. As outlined in Noble's Procurement Policy, our third-party business partners undergo rigorous screening for compliance with global legislation impacting international trade, human rights, health and safety compliance, and financial security. Noble views our third-party partners as a direct reflection of our values and principles; therefore, we demand the same level of excellence and commitment from them that we expect from ourselves.

**Q: How does Noble ensure that a vendor complies with global legislation impacting human rights?**

A: Noble's third-party business partners undergo rigorous screening for compliance with global legislation impacting international trade, human rights, health and safety compliance, and financial security.

**Q: How does Noble engage in, and contribute to, local communities and society at large?**

A: Not only does Noble train and hire local labor, but we also engage with the communities in which we operate by volunteering and participating in charitable and/or service activities and providing support to global nonprofit organizations.

**Q: Can any third-party obtain approval to conduct business with Noble?**

A: Noble views our third-party partners as a direct reflection of our values and principles. Therefore, Noble only engages with third parties that mirror our same level of excellence and commitment.



To contribute to our local communities and society at large, we:

- **Engage suppliers through appropriate supply chain processes.**
- **Volunteer and participate in charitable and/or service activities within our communities.**
- **Provide support to global nonprofit organizations.**
- **Commit to inclusion in every aspect of our operations.**

Our Modern Slavery and Transparency Statement is available online at:

Anti-Slavery and Human Trafficking Statement

## Delivering "First Choice" Performance

We pursue excellence and strive for high quality in every aspect of our work. Through a system of continuous improvement, we strive to enhance our operating efficiency, boost asset reliability, improve safety performance, and contribute to environmental protection. We actively pursue learning, growth, and improvement to better serve our stakeholders and make Noble the "first choice" driller.

## Protecting the Environment

We understand that creating a sustainable world requires us to be mindful of our environmental impact. That is why we are committed to promoting eco-friendly practices within our company, among our employees, and with our business partners. We are dedicated to being responsible environmental stewards by adhering to Noble policies that emphasize environmental protection, incident prevention, and waste reduction—without exception.

## Our Sustainability Strategy

Our sustainability strategy highlights our unwavering dedication to environmental protection and creating a positive impact on society and the economy. We are committed to integrating sustainable practices into our daily operations, aligning with our mission and values. By setting clear goals, detailing specific actions, and ensuring accountability, we are making significant strides.

Our Sustainability Report is available online here.

## Advancing Through Innovation

Noble's employees are the driving force behind our company's success, leveraging technology to empower our business. Their innovative solutions not only address critical issues within our fleet, but also enhance the efficiency of our rig operations, ensuring the company's long-term growth. At Noble, innovation is defined at strategic, cultural, and organizational levels within the company.

### Strategic innovation

Our strategic innovation strategy uses a disciplined approach to find, create, and capture long-term value through unique technology partnerships within the energy ecosystem. This strategic framework provides Noble with business resilience, new growth opportunities, a "first mover" advantage on key technologies, and the opportunity to maximize returns on technology investments.

### Cultural innovation

Our founder, Samuel Lloyd Noble, instilled his values as an entrepreneur and philanthropist into the cultural roots of our company. Our leaders continue to nurture this passion by fostering a culture of innovation. At Noble, employees are encouraged to adopt new methods to improve our work processes, while we provide an environment that stimulates creativity and serves as a safe space for generating new ideas.

### Organizational Innovation

At Noble, every employee is encouraged to create and share ideas to improve organizational performance. By building trust, promoting wellness, fostering continuous learning, and encouraging open communication, we maximize the effectiveness of peer-to-peer interactions and drive organizational innovation.

**Our customers and stakeholders deserve accurate and complete information about Noble. We maintain our books and records in a manner consistent with all applicable laws, regulations, and accounting requirements.**

# How We Work

# How We Work

## Accurate Financials

At Noble, we're committed to making sure all financial information is recorded accurately, and with integrity. Keeping fair and precise books and records is not just about meeting financial and accounting regulations; it is vital to our business management. We take pride in the accuracy of everything we report whether it's internal data for management or public financial statements, press releases, or future outlooks we share with investors and the public. We strictly prohibit any undisclosed or unrecorded company funds or assets.

Employees are also strictly prohibited from attempting to influence, mislead, or pressure Noble's independent auditors in any way that could lead to inaccurate financial reporting.

## Business Records & Disclosures

Employees must maintain Noble's business records in accordance with the company's record retention policies. If the company becomes involved in litigation or a government investigation involving records under your control, you should consult the company's Legal department for guidance regarding those records.

Additionally, all public disclosures and communications made by Noble—such as periodic financial reports, fleet updates, press releases, and SEC filings—must be accurate, timely, and clear. Materially misleading or incomplete disclosures can negatively impact Noble's reputation and business operations.

**Q: What should I do if I suspect a financial record is not accurately reflected?**

A: If you suspect that a financial record is not accurately reflected, you should report the discrepancy to your supervisor or manager, the Ethics & Compliance department, or the NobleLine. It is important to address any inaccuracies promptly to maintain the integrity of the company's financial records.

**Q: How should I dispose of records that I no longer deem necessary to retain?**

A: Records that are no longer necessary to retain should be disposed of securely and in compliance with Noble's records retention policies and legal requirements. This typically involves following specific procedures for the secure destruction of records to ensure sensitive information is not compromised.

## Fair Dealing

At Noble, we deal fairly with the company's customers, suppliers, competitors and employees. Taking unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice violates the Noble Code and Noble policy.

## Maintaining High Ethical Standards

At Noble, we are committed to maintaining the highest ethical standards in all our business practices. We recognize that our success relies on the integrity of our team, and we are dedicated to doing the right thing in every interaction with our stakeholders. As such, breaches of Noble's Conflict of Interest, Gifts and Hospitality and Insider Trading policies are strictly prohibited in our operations and can lead to discipline up to and including termination of employment.

## Conflicts of Interest

A conflict of interest occurs when personal interests—whether real, potential, or perceived—clash with Noble's. These conflicts typically occur when the opportunity for personal gain influences our decisions or job performance at Noble. Conflicts of interest may also arise when an employee, officer, director, or a family member, receives improper personal benefits as a result of his or her position in the company. These situations can make it difficult for employees to remain objective and make sound business decisions on behalf of Noble. It is best to steer clear of any situation that even appears to be a conflict. Fortunately, most conflicts of interest can be avoided or managed if they are disclosed early and addressed appropriately.

To manage conflicts of interest:

- **Avoid or withdraw from decision-making situations where your personal activities or relationships might interfere with your objectivity.**
- **Promptly disclose any actual, potential, or perceived conflict of interest.**
- **Never act as a consultant or board member for a competitor.**
- **Never use your position or influence at Noble to obtain an improper benefit.**

Conflict of Interest Policy

Employees, officers, and directors owe a duty to the company to advance its legitimate interests when the opportunity to do so arises. Therefore, employees, officers, and directors are prohibited from:

- **Taking personal advantage of opportunities that are discovered through the use of corporate property, information or position.**
- **Using corporate property, information, or position for personal gain.**
- **Competing with the company.**

## Gifts and Hospitality–Customers & Suppliers

Our relationships with our customers and suppliers are essential to the success of our business, and we understand that exchanging small gifts and hospitality can strengthen these connections. However, it is important to be cautious, as misusing these gestures can pose risks to our business. For that reason, we have a policy of not offering, accepting, or providing any gift or hospitality of disproportionate value that could influence, or appear to influence, business decisions. If you have any questions about whether you may offer or accept gifts or hospitality from a customer or supplier, please contact your supervisor, a senior manager, or the Ethics & Compliance department.

Gifts, Hospitality, and Entertainment Policy

## Gifts and Hospitality-Government Officials



Gifts, travel, and hospitality for government officials are highly sensitive matters. Under anti-bribery laws, certain gifts, travel, or hospitality provided to government officials can be considered a bribe and violate the laws and regulations in the countries in which Noble operates. Before offering any items to a government official, you should ensure compliance with Noble policies and procedures. If you have any questions regarding whether you may offer any gifts, travel, or hospitality to a government official, please contact the Ethics and Compliance department.

## Charitable Donations

Charitable contributions made by Noble should support charitable causes and organizations whose morals and ethical principles mirror Noble's. Requests for charitable contributions must be reviewed and pre-approved by the Charitable Contributions Committee and/or the Ethics & Compliance department. Noble strictly prohibits making or offering to make a charitable contribution with the intent to influence company business.

**Q. A supplier has invited me to his daughter's wedding. Is it ok for me to purchase a gift?**

A: While it is thoughtful to want to give a gift, it's important to consider Noble's policy on gifts and hospitality. Noble has a policy of not offering or accepting any gift or hospitality of disproportionate value that could influence, or appear to influence, business decisions. In this case, it would be best to consult with your supervisor, a senior manager, or the Ethics and Compliance department to ensure that purchasing a gift aligns with Noble's policies and does not create any potential conflicts of interest.

**Q. The government of the country where we are drilling (and/or the client's contract) requires that Noble make charitable contributions of a certain type amount. Do I need to get approval from Ethics & Compliance?**

A. Yes. While the amount of the contribution(s) will be determined by the law and/or contract, Ethics & Compliance will need to do background checks on the recipients that your team has chosen. Sometimes charities are screens for bad actors. Checking with the Ethics & Compliance department ensures that the charities you chose will not expose Noble to bribery and corruption risks.

**Q: Can I share information about a new project at Noble if everyone in the office knows about it?**

A: Information that appears to be common knowledge may be nonpublic and material. Inquiries regarding whether certain information should remain confidential should be directed to the Legal department to avoid potential insider trading, which is a crime.

Information Disclosure Policy

## Political Activity

Noble recognizes and respects the rights of individuals to express their personal political views. However, as a company, we adhere to strict regulations governing corporate political activities, lobbying, and contributions in the jurisdictions where we operate. Noble influences public policy and expresses political views through authorized lobbying and political contributions to government officials. Only designated team members are permitted to engage with government officials on behalf of Noble, and any lobbying or political contributions must be pre-approved by Corporate Affairs or Noble's Legal department.

## Political donations

A political donation is considered any financial contribution or the provision of goods, commodities, or services to a politician, political campaign, political party, political cause, or organization sponsoring or opposing a referendum or ballot measure. Employees can make personal political donations, however, Noble will not reimburse employees for personal donations. Additionally, employees must clearly convey that the donation is personal and does not represent the views of the company. Employees are not authorized to make donations to politicians, political parties, or candidates for office on Noble's behalf. Participation in personal political activities during paid work hours or the use of corporate facilities or resources (email, copy machines or conference rooms) without pre-approval from the Ethics and Compliance department is a violation of the Noble Code. Questions regarding personal political donations and the use of company time or resources should be directed to Noble's Ethics and Compliance department.



### Noble employees should never give or accept gifts:

- That are illegal or inappropriate.
- In cash or cash equivalents.
- When business decisions are being made by Noble or its business partners.
- That exceed a nominal value, unless approval has been obtained by the Ethics & Compliance department.

*** Gifts should not be given to a government official without approval by the Ethics & Compliance department, as these gifts could violate certain laws and regulations..*

## Insider Trading

Noble is a large, publicly traded company. There may be times when Noble officers, directors, or employees may have access to information about Noble, a supplier, a competitor, or a customer that is considered "material" and "nonpublic."

**Material information** is information an investor would consider important when deciding to buy or sell securities.

**Nonpublic information** is information that is not generally available to the public.

Using this material, nonpublic information for personal or financial gain, such as buying or selling shares is known as insider trading. Insider trading is illegal, and against Noble policy. Noble also prohibits "tipping". Tipping is when material, nonpublic information is shared with others—family, friends, colleagues, etc. Tipping is a violation of the law even if the person never trades securities based on the information. Both Insider Trading and Tipping are unethical, illegal, and violate Noble's policies. They may also subject an individual to severe civil and criminal penalties, including fines, and imprisonment.

Directors, officers, employees, and agents who trade in Noble securities must comply with the Noble Policy on Trading in Company Securities. Certain employees are subject to a "blackout period," meaning they may not buy or sell Noble securities during a specific period. The affected employees may not buy or sell Noble stock until notified by the company. If you have any questions regarding whether Noble-related information is material or nonpublic, please contact Noble's Legal department.

Policy on Trading in Company Securities

### To prevent insider trading, employees should follow these guidelines:

- Never buy, sell, or otherwise deal with shares of Noble, or any other publicly traded company, when in possession of inside information.
- Never give material information to anyone outside Noble, including family members, relatives, or friends.
- Only share inside information with fellow employees on a need-to-know basis.
- Protect inside information from accidental disclosure.
- Never spread false information or attempt to manipulate the price of publicly listed securities.

## THIRD PARTY ENGAGEMENT

### Anti-Bribery & Anti-Corruption

Trust and transparency are the cornerstones of Noble's global operations and the foundation of our business reputation. We prioritize compliance with legal requirements in all regions, especially where bribery and corruption are common. Bribery involves offering, promising, giving, or authorizing anything of value—either directly or through a third party or agent—with the intent of gaining an improper advantage. Facilitation payments occur when a government official is paid a nominal amount to expedite an administrative process or service that the payer is legally entitled to. Noble strictly prohibits both bribes and facilitation payments.

Every employee is responsible for understanding and complying with applicable laws. For further guidance, consult Noble's Anti-Bribery and Anti-Corruption Policy, or contact the Ethics & Compliance department for questions about anti-bribery and anti-corruption laws and situations where there may be a conflict between Noble policies and local law.

Anti-Corruption and Anti-Bribery Policy

### Antitrust and Competition Laws

Antitrust and competition laws are essential for promoting global free enterprise and preventing unfair business practices that restrict competition. These laws ensure fair dealings when Noble engages with customers, suppliers, competitors, and other third parties. Noble is committed to complying with these laws. It is a violation of the Noble Code for an employee, officer, or director to engage in unlawful activities such as price fixing or providing misleading information to obtain a favorable market position. For any questions regarding antitrust and competition laws, employees should contact the Ethics & Compliance department.

### Anti-Money Laundering

Money laundering occurs when the proceeds of a crime are comingled with funds from legitimate business activities to conceal the criminal origin of the funds. At Noble, we are committed to conducting business transparently by accurately recording, managing, and reporting our financial activities and ensuring compliance with all relevant anti-money-laundering laws. We have implemented a robust due diligence process to prevent participation in and use of the Company to launder money. To ask questions or report money-laundering activity or suspicions, please contact the Ethics & Compliance department or use the NobleLine.

Anti-Money Laundering Policy

### Violations of antitrust and competition laws include:

- Sharing company pricing, supplier rates, or other strategic information with competitors.
- Agreements among competitors to only operate in certain regions or with certain customers.
- Agreements to fix prices or limit service or product production.
- Making false claims or negative comments about competitors' products or intentionally interfering with their business relationships.
- Rigging bids or tenders for services.

## Trade Controls

Noble's global footprint requires compliance with both regional and international trade rules and regulations. We comply with a wide range of laws, including trade rules, sanctions, and import and export restrictions.

Given the nature of our business and the frequent changes in trade laws, it is important for Noble and our employees to stay informed about trade restrictions that affect our operations. Trade control laws are extremely complex. Therefore, before moving any items across an international border, reach out to the Global Supply Chain or the Ethics & Compliance department.

### To prevent trade control violations, Noble employees should:

- Never distribute, receive, or market any items across international borders without first confirming regulatory implications.
- Follow Noble's policies and procedures governing trade regulations.
- Never market, sell, or provide goods or services to businesses or individuals added to an embargo or sanction list.

Procurement Policy

## Sanctions and Embargoes

While trade control laws impact items we move or sell, certain international laws limit the people and entities with whom we do business. Noble does not do business with people or entities on a sanctions or embargo list. We conduct due diligence on third parties- vendors, clients and even charities- to verify their potential status as a sanctioned entity. Any third parties outside of the regular vendor process must be reviewed first by the Ethics & Compliance department.

## Global Security

Noble is committed to avoiding any involvement in activities that support crime or terrorism. This means we do not trade or sell technology or goods that could be used for chemical, biological, or nuclear weapons, or delivery of missiles. Additionally, we refrain from trading if we suspect that goods or technology could be misused for these purposes. Before moving technology or goods across an international border, make sure to contact Global Supply Chain.

## MANAGING RISKS IN INFORMATION AND TECHNOLOGY

### Protecting Our Assets and Technology

We are dedicated to safeguarding Noble's assets and ensuring their effective use. Our assets include advanced technology and intellectual property, which are vital for delivering quality services and excelling in our work. Our established guidelines protect sensitive information, safeguard company assets, and ensure proprietary data remains confidential. We each play a vital role in protecting our sensitive data, so comprehensive training is provided to ensure our team understands the Company's security and confidentiality policies. This not only enhances our internal security but also demonstrates our commitment to earning and maintaining the trust of our stakeholders.

### Ensuring Data Security

Noble's security measures are designed to safeguard the confidentiality, integrity, and availability of critical information and IT assets. Access to Noble's computers and network services, including the internet, email applications, and file directories, is restricted to authorized users only. User access is limited to the specific IT assets and systems necessary to perform their job responsibilities. Noble has also implemented monitoring to prevent misuse or unauthorized access. We comply with legal, regulatory, and contractual requirements to ensure the security of our information and IT systems. Unauthorized circumvention, alteration, or removal of IT controls is a violation of the Noble Code.

### Data Privacy

The right to privacy is fundamental to everyone. At Noble, we may occasionally collect and process employees' personally identifiable information for legitimate business purposes and in compliance with relevant laws and Noble's policies and procedures. Our data collection is strictly limited to information considered essential for business operations. Information sharing will only occur when legally necessary. All employee information is securely maintained, with strict controls limiting access and viewing privileges to authorized personnel only. Personal information should only be retained long enough to accomplish the task for which it was collected.

For questions or guidance regarding data privacy or for assistance, please contact our privacy team at Privacy@noblecorp.com or Ethics & Compliance.

Data Privacy Policy

### Intellectual Privacy

Noble's intellectual property rights are among our most valuable assets, alongside our people and equipment. Our leadership and differentiation within the industry are fueled by our original ideas and intellectual property. Noble's commitment to and investments in technology, has lead to new inventions, discoveries, process improvements, computer programs, and other proprietary information. Therefore, it is crucial that we protect our confidential information and intellectual property to prevent unauthorized disclosure or misuse.

Policy on Confidentiality and Intellectual Property Assignment

## Artificial Intelligence

Noble is committed to leveraging "Artificial Intelligence," more commonly known as "AI" to drive AI to drive innovation within the Company. We encourage employees to explore the use of AI that aligns with Noble's core values of integrity and transparency. AI opportunities should be pursued to improve Noble products, services, and processes. However, employees should always ensure compliance with applicable laws, regulations, and company policies. Noble's AI practices will undergo revision as needed to align with the evolving AI landscape.

### Company Use

Employees must adhere to all applicable governing laws and regulations when utilizing AI tools, especially regional Data Privacy laws (including the GDPR regulations implemented in the European Union) and regulations applicable to Noble and Noble-owned devices. To ensure safe use and protection of Noble assets, employees may only use IT applications on Noble-owned devices or devices authorized for use on the Noble network such as computers and mobile devices if they have been approved by IT in advance. IT security must assess any associated risks prior to activating new AI features or applications. When using AI technology, employees should also refrain from using confidential, proprietary, or sensitive Noble or client information (i.e. Passwords, credentials, or any personal information about any Noble employee, contractor, vendor, client, outside consultant, or advisor).

### Responsible Use

Noble is committed to the ethical, transparent, and responsible use of AI in our operations. Every Noble employee, contractor and advisor individually and collectively impacts the reputation of our Company. Each party is responsible for utilizing AI in an ethical manner. Compliance with applicable laws, regulations, and relevant Noble policies ensures the secure use of AI tools. Although AI tools may enhance Company performance, they must be utilized while maintaining Noble's high standards for honest and ethical conduct.

Artificial Intelligence (AI) Use Policy

**Q. Can I use a free online AI tool to help summarize my emails or assist in the performance of my job duties?**

A: No, you may not utilize the AI tool unless it is approved by Noble's IT Department. Employees should not input any of Noble's sensitive, confidential or internal information when using AI tools.

**Q. What should I do if I notice an AI tool is producing biased, unfair or incorrect results?**

A. Report it to your manager or Noble's IT Department immediately. Noble is committed to fair and responsible AI use.

**Q: Can I use AI tools on my own personal device for hobbies or my own interests?**

A: Yes, if you access the tool on your own time and device without utilizing any Noble data or system; and without conflicting with the performance of your job responsibilities.

## Communications

When communicating with the media, financial analysts, investors, and the public, Noble maintains a unified voice. Our customers and stakeholders deserve and expect accurate and timely information about Noble. As such, our approach is direct and ethical, ensuring we never intentionally mislead anyone engaging with Noble. The company's reputation and public image could be tarnished by inaccurate or untimely public statements, which could also violate the law. To ensure consistency and clarity, only designated company spokespersons are authorized to speak on behalf of the company.

## Social Media

Social media can effectively stimulate conversation and discussion among our employees, customers, and partners. At Noble, personal social media should be used responsibly, ensuring it does not disrupt our work. Noble employees may not use their personal social media to conduct company business. Only approved personnel may speak on behalf of or share information about Noble. Inaccurate, incomplete, or untimely communication can damage our reputation or have legal consequences. For additional guidance, please contact Communications or Investor Relations.

Electronic Communication Policy

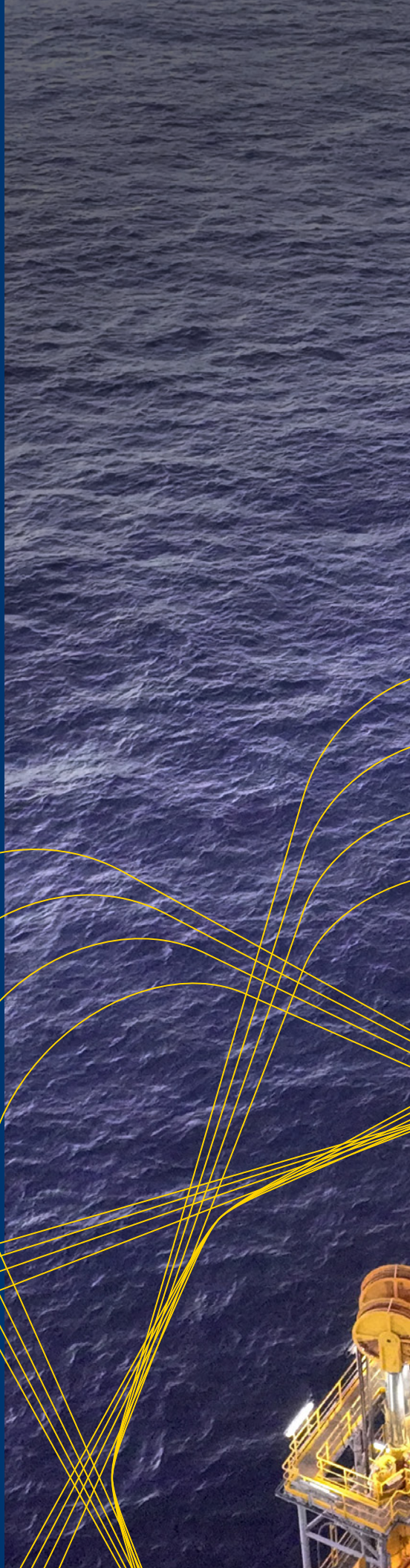
**Q: I would like to share a post about a successful job I just completed on a Noble rig. Is it okay to post this on my personal social media channels?**

A: You can share your personal thoughts about the job success, such as expressing pride in the work Noble is performing on the rig. However, do not include any specific details about the job itself, or any customers, because that is considered confidential information.

**Q: Can I safely check my work email on public Wi-Fi at my favorite coffee shop??**

A: While it might be convenient to use public Wi-Fi at your favorite coffee shop, it's important to consider the security risks involved. Public Wi-Fi networks are often less secure and can be vulnerable to cyber-attacks, which could compromise sensitive information, including work emails. To ensure the security of your work emails and other sensitive data, it is recommended to use a Virtual Private Network (VPN) to encrypt your connection, enable two-factor authentication, and avoid accessing highly sensitive information over public Wi-Fi. If you have any doubts or need further guidance, consult Noble's IT department.

**Through our core values, superior operational execution, and commitment to doing business ethically, Noble has positioned itself to continuously deliver the highest quality service and performance.**



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