



## Modern Slavery & Transparency Statement

Noble Corporation plc (“Noble”) and each of its wholly owned subsidiaries (“Noble Group”) are committed to acting ethically and responsibly in carrying out our business. This includes complying with applicable slavery and human trafficking laws.

This statement constitutes the modern slavery and transparency statement in respect of the Noble Group for the year ending 31 December 2022 in compliance with applicable requirements for transparency, including but not limited to the U.K. Modern Slavery Act and the Norwegian Transparency Act. As a result of the business combination between Noble and The Drilling Company of 1972 A/S (“Maersk Drilling”) in the fourth quarter of 2022, this statement covers legacy Maersk Drilling and Noble activities in the first through third quarters of 2022 and the combined activities of Noble Group in the fourth quarter of 2022.

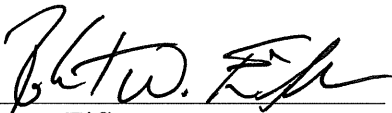
Noble Group’s commitment to a strong compliance culture is fundamental to our continued growth as a leading offshore drilling contractor for the oil and gas industry. Noble’s Code of Conduct provides the foundation for our culture and underscores our commitment to performance with honesty, integrity, and respect. The Code also includes our responsibility and commitment to follow all applicable laws as well as our own internal policies and processes, and to require any supplier or third party who works with Noble Group to comply with similar fundamental principles. Noble Group’s actions, policies and processes are designed to ensure that slavery and human trafficking are not present in its supply chain.

- **Internal Training:** Noble Group’s employee training includes awareness on human trafficking and modern slavery. The training is designed to allow employees to better understand these issues and make the employee aware of their responsibilities to Noble Group and society in this regard. The training also identifies what options are available to help Noble Group keep its business operations and supply chain in proper order.
- **Employee Reporting:** Noble has a dedicated “whistleblower” phone line and online secure web portal available to all Noble Group employees and suppliers worldwide to report any concerns—ethical, environmental, safety, or otherwise.
- **Noble Code of Conduct:** Noble Group’s officers, directors and personnel are required to follow the Noble Code of Conduct, the laws that regulate the Noble Group’s business and the ethical principles that guide Noble Group.
- **Recruitment Procedures:** Noble Group has in place appropriate pre-employment screenings for the hiring of new employees to confirm applicants’ eligibility to work in their respective locations.

Noble Group procures goods and services from various suppliers on a global basis. While recognizing that different areas of the world have differing laws regarding human rights, Noble Group strives to uphold the fundamental principles set forth in its Code of Conduct. Noble Group obtains contractual commitments and communicates its expectation to suppliers with the goal to ensure there are systems and processes to monitor, identify and assess potential risks, and mitigate and eliminate the risk of, among other matters, slavery and human trafficking.

- Supplier Questionnaires: As part of Noble Group’s supply chain on-boarding program, Noble Group uses a risk-based approach in determining whether to submit a detailed questionnaire to certain suppliers, called the “Responsible Procurement” questionnaire (“Questionnaire”). The risks provided by each supplier naturally differs dependent upon the scope of their supply, and thus suppliers within certain categories are managed with greater focus on qualification and heightened due diligence processes. This allows Noble Group to assess whether the supplier has implemented a program to monitor forced labor, slavery or the trafficking of persons. Examples of suppliers that are subject to the Questionnaire include but are not limited to:
  - Yards: Resulting from the use of heavy machinery, chemicals, and other hazardous materials, yards pose risks from the perspectives of health and safety and human and labor rights.
  - Goods and Services: Reputational risks exist in part due to the use of sub-contractors. Risks are related to health and safety and human and labor rights.
  - Security: Security services provided by sub-contractors potentially expose personnel to physical hazards.
- Contractual Obligations: Noble Group’s standard procurement contracts require suppliers (and their suppliers) to comply with all applicable laws and regulations where they conduct business, including applicable labor and employment laws, immigration laws and human trafficking or other laws regarding forced or compulsory labor.
- Supplier Audits: In accordance with its risk-based approach, Noble Group has the right to conduct audits of suppliers to verify compliance with Noble Group’s contractual anti-slavery and human trafficking requirements.

Noble Group is committed to continue monitoring its policies and procedures for effectiveness and taking prompt remedial action when it becomes aware of any non-compliance.



Robert Eifler  
Director, President and Chief Executive Officer

*Noble’s Board of Directors has approved this statement at its board meeting held on 2 May 2023. This is Noble Group’s statement for the financial year end 31 December 2022.*