

Modern Slavery and Human Trafficking Statement

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the "Act"). It sets out the steps taken by Transocean¹ to prevent modern slavery and human trafficking in its business and supply chains for the year ending 31 December 2019.

Our Stance

Transocean is committed to acting ethically and with integrity in all of its business dealings. Transocean is a strong opponent of any form of forced, indentured, involuntary or child labor, slavery or human trafficking and will not knowingly conduct business with those engaged in such activities or knowingly permit them to be carried out as part of its business. Transocean is committed to putting effective systems and controls in place to safeguard against any violations of such behavior.

Our Business and Supply Chains

Transocean is a leading international provider of offshore contract drilling services, globally organized and staffed to operate a versatile fleet of mobile offshore drilling units providing customers with drilling services for the exploration and development of offshore oil and natural gas.

Transocean sources a range of goods and services from suppliers based throughout the world. In all of its dealings with those suppliers, Transocean strives to uphold the highest ethical standards at all times.

Current Policies and Procedures

Transocean's Code of Integrity sets out its commitment and expectation
that its employees, agents and suppliers will conduct business with the
highest level of integrity in all aspects of its operations and specifically
identifies Transocean's opposition to forced, indentured, involuntary or child
labor, slavery and human trafficking. Transocean's Code of Integrity can be
found on Transocean's website: www.deepwater.com

- Transocean's recruitment procedure for the hiring of new employees includes a screening process to confirm eligibility to work in order to safeguard against human trafficking or individuals being forced to work against their will.
- When engaging with suppliers Transocean includes contractual provisions requiring compliance with all applicable laws, rules and regulations including compliance with our Code of Integrity.
- Transocean actively encourages employees, agents and suppliers to share concerns related to violations of applicable laws, rules and regulations including our Code of Integrity.

Continued Commitment

Transocean's continued commitment includes respecting local cultures and human rights by maintaining a healthy and safe work environment, ensuring fair employment practices and competitive terms and conditions of employment, and compliance with all applicable laws and regulations.

Transocean will continue to review its policies and procedures, including requiring that our suppliers have their own systems and controls in place, to mitigate modern slavery and human trafficking risk.

<u>Accountability</u>

Transocean is committed to monitoring the effectiveness of our observance of human rights at all leadership levels within Transocean and to immediately take remedial action should any non-compliance be identified.



Jeremy Thigpen, President and Chief Executive Officer

June 5, 2020

¹ This statement constitutes the modern slavery and human trafficking statement in respect of Transocean Ltd. and the undernoted subsidiaries of Transocean Ltd, which fall within the scope of the Modern Slavery Act 2015, for the year ending 31 December 2019. This statement has been approved by the board of directors of each such subsidiary.