

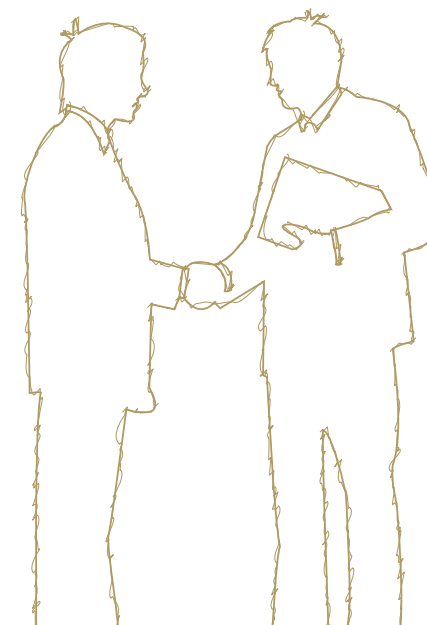
Hunting PLC

Code of Conduct 2024



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Introduction from our Chief Executive

Hunting PLC is a global supplier of products, technology and services to many of the world's leading energy producers. These operations touch most regions of the world and our private and public sector customers have the highest profiles. We have a strong reputation that has been developed through our people and quality of products over many years. This gives us leadership in our chosen markets and is something of which we should rightly be proud.

At the heart of our success has been an ethos of honesty and integrity, which are the core values of Hunting PLC's Code of Conduct. The way in which we deal with each other, and our external partners, not only defines the Hunting PLC brand across the globe, but develops standards which enable the Group to grow further.

In many instances, high standards of business integrity are common sense, but every Group employee and external partner is ultimately responsible for their actions, which reflect on the Group as a whole. If these standards are not met, the Group would be exposed to loss of reputation and future business, or for offending individuals, fines and/or imprisonment.

Every Relevant Employee and Business Partner is to be provided with a copy of this Code and we expect them to safeguard its standards. Hunting PLC senior management are responsible for a communication plan, along with relevant training on a periodic basis, in which we expect applicable staff to participate.

If you are aware of any breaches of this Code, you have a responsibility to report it confidentially to the Group's Chief Compliance Officer or the Senior Independent Director or to Safecall Limited. Their contact details are found at the end of the Code. I would like to stress the importance of consultation if you are in any doubt or have any concerns.

The reputation and future of Hunting PLC is in our own hands, I hope this Code allows us to continue to grow and build a bigger and more successful group in the future.



Jim Johnson
Chief Executive Officer

Background to the Code of Conduct

This Code of Conduct (“Code”) sets out the ethical principles by which all businesses and employees of Hunting PLC (“the Group”) are expected to operate worldwide. Compliance with the Code helps to sustain and enhance our reputation and provides a strong message of integrity to all of our stakeholders.

There are a number of parties who are specifically subject to the Code:

- All employees, but especially those who interact with third parties (referred to as “Relevant Employees”).
- All individual reporting entities within the Group, which might be a legal entity, trading branch or site, depending on the divisional structure (and referred to as a “Business Unit”).
- All agents, contractors, distributors, associates and joint venture partners with whom we do business in Hunting PLC (who we refer to as “Business Partners”).

Our major customers and suppliers (who we refer to as “Trading Partners”) rely upon Hunting’s reputation for honesty, integrity and quality. As such, we will also provide this Code to all major customers and suppliers.

We must take the greatest care in how we deal with the employees of governmental, state-owned and other public organisations, who we refer to as “Public Officials”. There is stringent legislation referred to in the “Preventing corruption” section that discusses this further.

The Board has nominated Bruce Ferguson as Chief Compliance Officer, to monitor compliance with the Code. Further, to assist in implementing, communicating and administering the Code, a group of “Senior Managers” has been identified. These individuals comprise the senior operational leadership of the Group, who can be found on the Hunting PLC website at <https://www.huntingplc.com/about/leadership>, together with the Hunting PLC Company Secretary and Group Financial Controller.

Senior Managers must lead by example, and give those who report to them the necessary resources and support to understand and follow this Code’s requirements. The Code is nevertheless no substitute for accepting individual responsibility and we must each exercise sound judgment and common sense in our actions and dealings with others and if in doubt, seek advice as necessary.

“At the heart of our success has been an ethos of honesty and integrity...”

Core Principles of the Code

Every employee and Business Partner has a critical part to play in ensuring the Code becomes part of the fabric of our organisation – “doing business the right way” is not about compliance, but culture. No employee or Business Partner should be afraid to express their concerns about perceived unethical behaviour and consultation is critical, even when they are unsure as to its importance or materiality. In adopting the Code, encapsulated in the following Core Principles, we can work together to deliver growth and prosperity to the Group.

Our ethos of honesty and integrity is a responsibility we carry as a Group to all our stakeholders and our commitment includes the following:

- **We aspire to deliver growth and strong performance in all our operations.**

We invest in operations where growth opportunities are identified, make complementary acquisitions where they fit with the ethos and direction of the Group and divest business lines we feel would be better held in the hands of others, always subject to rigorous financial and commercial review.

- **We behave with integrity.**

In an environment of continuous business change, Hunting PLC promotes a culture of honesty, transparency and fairness. This extends to a commitment to doing business the right way, where we will not partake in unethical practices such as bribery and expect the same of our Business and Trading Partners.

- **We are objective and trustworthy.**

Hunting PLC employees act without bias and conflicts of interest. We do not collude with competitors or otherwise act in an anti-competitive fashion. When confidential information is placed in our care, we respect its sensitivity and keep it secure.

- **We develop mutually responsible business relationships to drive our strategy.**

A customer focused approach is core to the Group’s ethos and growth strategy. We are committed to dealing in a transparent and fair way with all our Business and Trading Partners, with whom we seek mutually beneficial relationships and communicate our core business principles as part of a collaborative process.

- **We drive growth in a responsible manner.**

Hunting PLC maintains distinct Business Units, where employees are encouraged to seek opportunities to develop the business, but never at the expense of the highest ethical standards. We have a culture of continuous improvement, focused on safety, quality and value for all users of our products and services.

- **We respect our colleagues.**

Hunting employees have the right to work in a secure environment, with proper training and equality with their peers. We expect our employees to conduct themselves to the highest of ethical standards and to recognise the contribution of their colleagues.

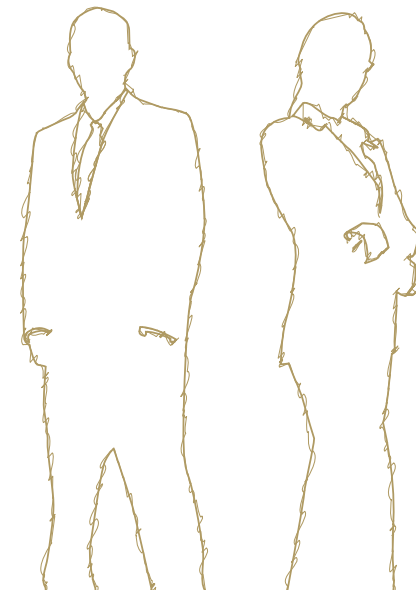
- **We respect the laws and principles of the jurisdictions in which we operate.**

Hunting PLC recognises its obligations as a leading Public Company and expects its employees to observe the laws, rules and regulations in all jurisdictions where the Group has operations.

- **We behave in a socially and environmentally responsible manner.**

Hunting PLC applies socially responsible principles to its business strategy. We have a firm focus on health and safety. We respect local cultures and are sensitive to the differences within our global operations. We always strive to apply the highest standards in protecting the environment.

“We have a culture of continuous improvement, focused on safety, quality and value...”



A: Preventing corruption

The way we deal with Business Partners, Trading Partners and Public Officials in all our countries of operation will direct our business growth as a Group in the long term. The ethos of Hunting PLC is about acting in a transparent and fair manner, which includes neither offering nor accepting bribes or inducements, nor having involvement in any corrupt business dealings and practices. Attempting to improperly influence a person, Public Official or business outcome is also unacceptable.

Bribery and corruption

In July 2011 the Bribery Act (2010) came into UK law. The Group has introduced procedures to comply with the Act including extensive training for relevant employees. The company also maintains a bribery and corruption policy, which is supplementary to the Hunting PLC Code of Conduct.

Most countries have laws that prohibit bribery and corruption and there is international pressure for a strengthening of these laws across the globe. In particular, many countries now have laws that extend beyond their borders, meaning an offence committed in an overseas territory can be prosecuted by the authorities in an individual's or their employer's home territory. Business Units should seek to avoid trading in those jurisdictions that do not have bribery and corruption regulations and consult the Chief Compliance Officer where this is unavoidable.

We cannot do business with any Trading Partner who does not adhere to the same high standards. The ethos of Hunting PLC is about acting in a transparent and fair manner, which extends to all third parties through whom we do business – we cannot seek to avoid responsibility by asking others to act improperly on our behalf.

We must be especially careful in our dealings with Public Officials, who operate under stringent rules, a breach of which could result in severe consequences for Hunting PLC and the offending employee or Business Partner.

Relevant Employees and Business Partners will periodically be asked to undertake appropriate bribery and corruption training and to confirm their understanding of Hunting PLC's bribery and corruption policies, together with the Code.

“The ethos of Hunting PLC is about acting in a transparent and fair manner...”

Gifts, entertainment and hospitality

Hunting PLC's policy is that no gifts should be given or accepted by an employee or Business Partner without prior approval. However, we recognise that where the giving and receiving of modest gifts is part of a cultural norm, we should not cause offence. As such, non-cash gifts with a value of less than US\$200 are considered to be sufficiently modest, subject to employees and Business Partners adhering to this Code. Any gift given or received in excess of this amount will require prior approval from a Senior Manager. The giving or receiving of cash or cash-equivalent items is never acceptable.

Entertainment and hospitality are part of a global corporate culture, where companies seek to build relationships, improve their image and present their goods and services to prospective partners. However, any hospitality given or received must be reasonable and proportionate and cannot be used to unduly influence a person to perform their role improperly. Any hospitality or entertainment event where the expenditure exceeds US\$400 per head must be subject to prior approval by a Senior Manager.

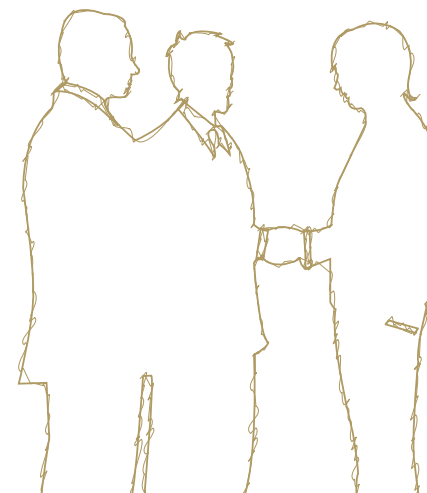
“...hospitality given or received must be reasonable and proportionate...”

Relations with government

All information provided to government contacts must be transparent, accurate and appropriate for purpose. Where we are in partnership with Public Officials, we must ensure the relationship is in full compliance with local law and any gifts and hospitality are employed purely in the interests of building and maintaining relationships, as opposed to being employed to directly secure a benefit for Hunting PLC.

Local approvals

We expect each Business Unit to employ comprehensive local approval procedures for all applicable processes, including those contemplated by the Code. A copy of these “Local Approvals” must be supplied annually to **compliance@hunting-intl.com**. This will reinforce compliance with the Code and ensure the highest ethical standards are maintained.



B: Personal integrity

We must operate with the highest personal standards and ensure that transaction flows are earned through honest competition and endeavour.

Money laundering

Money laundering is a generic term for hiding the criminal origins of money in a legitimate enterprise, for example using “dirty” money to buy “clean” products and then selling them on for “clean” proceeds.

Money laundering is a widespread problem that catches numerous legitimate operations and we have a duty to identify suspicious activity, including:

- A transaction where we cannot verify the parties – for instance where a customer requests that payment or a supplier requests remittance be made through an unrelated party.
- Transactions conducted through intermediaries, especially third party payment bureau service providers, who process financial transactions.

- A new customer who is prepared to pay an unusually high price.
- Transactions involving high-risk countries or offshore tax havens.
- Transactions with unfamiliar banks.
- Unusual requests – for example remittance of commissions in a series of small payments (which can often fall under the exchange review threshold in certain countries and be taken offshore) or payments through less traceable means, such as cash.
- Cash transactions.

In the event of any concerns, a Senior Manager should be consulted and always in the event of high value cash transactions.

“We must operate with the highest personal standards...”



Conflicts of interest

A conflict of interest will arise where personal interests conflict with those of the Group. Situations where there appears to be a conflict of interest should be avoided.

Conflicts of interest may arise through the following:

- Personal shareholdings, directorships and other financial interests.
- A close relative or spouse working in an organisation that does business with or competes with the Group.
- Benefitting from the sale, loan or gift of any business property.
- Failing to give the Group the opportunity to benefit from a legitimate business opportunity.
- Deriving any direct or indirect benefit, such as commissions, from a contract entered into by the Group or a Business Unit.

Employees and Business Partners are required to disclose on appointment, or when the conflict arises, any interest which may affect the Group's business.

Employee share dealing

Trading is prohibited in Hunting PLC's shares for all employees when in a close period, ahead of its financial results. Generally, the Group enters its full year close period 60 days prior to the publication of its annual results. The half year close period commences on 1 July and ends on the day of announcement of the half year results.

A formal "insider list" is maintained by Hunting PLC's Company Secretariat department, containing those individuals with access to share price sensitive information. This is readily available for scrutiny by the Financial Conduct Authority in the UK. Executive and Senior Management form part of this list, in addition to other Head Office personnel and professional advisors.

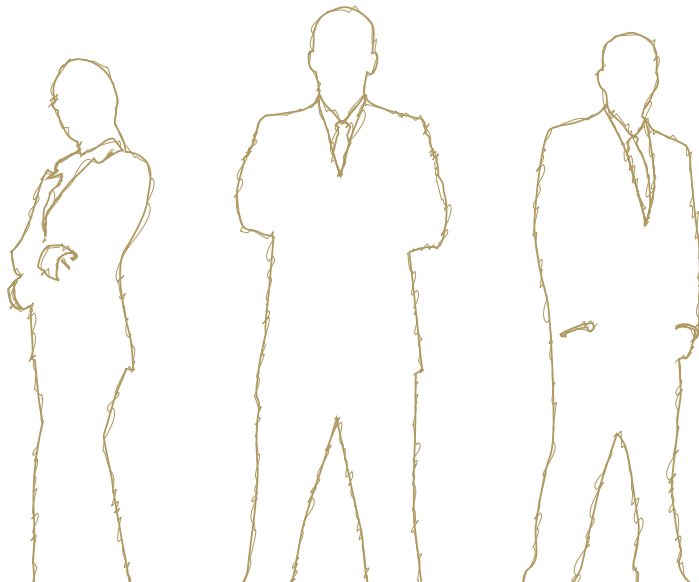
“Situations where there appears to be a conflict of interest should be avoided.”

C: Our people

The Group is committed to equality and fair treatment of its entire workforce, which involves mutual respect for each other and the protection of our working environment.

Global Human Rights Policy

Hunting PLC is committed to upholding the Human Rights of all our stakeholders including employees, local communities, customers, suppliers and governments.



Our policies extend to:

- Providing a safe working environment for all employees and contractors.
- Respecting the rights of the individual with a zero tolerance to any form of discrimination, harassment or bullying.
- Providing training and development programmes to our global work force.
- Not employing child labour.
- Promoting good relationships with the communities in which we operate.
- Operating in an environmentally aware manner.
- Acting with honesty and integrity with all our business partners.

“Hunting PLC is committed to upholding the Human Rights of all our stakeholders.”

Harassment

The Group's employees come from many countries with different backgrounds and cultures. The Group values the diversity of its employees and respects their right to work in a safe environment of mutual respect, free from harassment and ensuring equal opportunity.

Harassment can take many forms and includes:

- Slurs, insults, name calling and ridicule.
- Offensive or obscene comments, jokes, gestures.
- Bullying, public criticism, undervaluing effort.
- Unwanted physical contact, assaults or threats and intimidation.

Harassment in any form, especially sexual harassment, creates a hostile and abusive work environment and will not be tolerated.



Opportunity policy

Hunting PLC aims to ensure that no job applicant or employee receives less favourable treatment on the grounds of his or her Race, Ethnic Origin, Nationality, Age, Trade Union Activities, Sex, Marital Status, Part-time Status, Sexual Orientation, Religion, Belief or Disability.

This helps to ensure that no applicant or employee is placed at any disadvantage, which is not justifiable under UK Company or local jurisdictional law.

Drugs and alcohol

The Group is committed to ensuring that its employees, and where relevant, its Business and Trading Partners, are provided with a safe working environment. The consumption of alcohol (unless specifically approved by a Senior Manager and then only in moderation) or the use of controlled drugs on Group premises is incompatible with a safe working environment and with the proper performance of duties and as such, is prohibited. Employees must take care not to bring the Group into disrepute when on third party premises and will be subject to disciplinary action if they do.

“The Group values the diversity of its employees...”

D: National and international trade

Hunting PLC is committed to behaving with openness, transparency and integrity. This means that we will not act in collusion with our competitors and will be open and honest in our dealings in all markets, even where this is expensive or time consuming.

Compliance with laws and regulations

Hunting PLC is listed on the London Stock Exchange, subject to regulation by the UK Listing Authority and required to comply with UK Company and other laws. The Group and its Business Units also comply with the laws and regulations of the jurisdictions in which they work.

Each Business Unit must establish and enforce effective compliance procedures, where necessary through taking local advice. Where differences arise between local customs, practices, laws or regulations and this Code, the individual is required to consult the Chief Compliance Officer.

Competition legislation

Competition Law protects free and open trading across the world and applies to all companies. The penalties for breaching Competition Law are severe. Senior Managers are required to be familiar with local competition and anti-trust legislation and communicate this to relevant employees. Such familiarity is critical to ensure that we can avoid inappropriate behaviour within Hunting PLC and protect our interactions with Business Partners, Trading Partners and competitors. The laws of the UK and US are especially stringent and extend beyond their geographic borders.

There are a number of activities we need to be aware of and avoid:

- Agreements with competitors surrounding:
 - Bids and tenders.
 - Market pricing.
 - Production levels.
 - Customers and/or suppliers that we will or will not deal with.
 - Markets that we will or will not trade in.
- Discussion of confidential data with competitors, such as contract pricing or customer lists.
- Misrepresenting a competitor's capabilities.

Hunting PLC employees often meet competitors at industry meetings and if concerned about the direction of a conversation, they must either make our business ethics clear or walk away. In such cases, employees should report their concerns to the Chief Compliance Officer.

Export controls

Export controls give countries the ability to control the goods and services being supplied across national borders. These can involve physical and electronic transfers and exist to control activities such as Intellectual Property infringement and terrorism. Those that break export laws can be subject to severe penalties and it is important to note that the law may follow the product as well as the sale, meaning if Hunting PLC sells product to a third party who then exports to a prohibited territory, we could still be responsible.

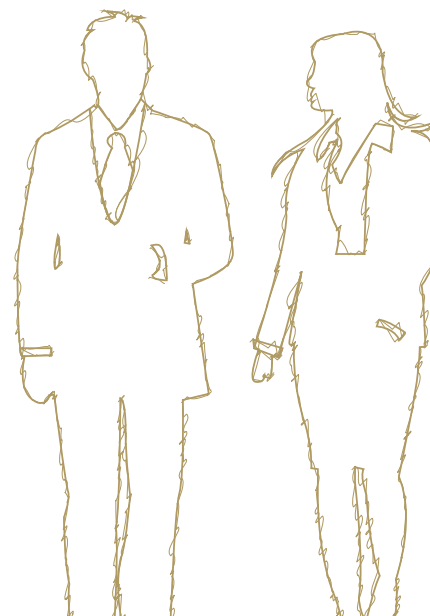
It is critical therefore, that we know where our products are going and maintain vigilance over potential breaches of the law. In particular, each Business Unit should seek to investigate whether any Hunting PLC products are particularly sensitive and identify those countries with whom there are export bans or limitations, or where special export licences are required.

Hunting PLC can provide guidance in the event of any concerns or questions.

“Those that break export laws can be subject to severe penalties...”

Import controls

Import controls give countries the ability to control the goods and services entering their jurisdiction and operate in a very similar fashion to export controls. It is important therefore to consider carefully the duties that apply on importation and the rules that need to be followed on documentation. A particularly critical consideration is the local coding of products to ensure the appropriate duty rates (or exemptions) are applied.



E: Doing business the right way

Hunting PLC's success is driven by its employees and all its external partners. Contracts, agreements and other arrangements with third parties should be transparent, fair and in line with market practices.

Company contracts

All employees must be diligent in selecting and monitoring Business Partners. Hunting PLC maintains policies and procedures in its "Group Manual", which includes a set of due diligence procedures for use by Business Units to ensure that a third party is reputable and has the appropriate skills and qualifications to act. Similarly, we only deal with Trading Partners who we know to be reputable, having made appropriate enquiries.

Business Partners should only be selected in the best interests of the Group and are required to understand the provisions of this Code.

Business Partners will periodically be asked to confirm their understanding of Hunting PLC's bribery and corruption policies, together with the Code.

“Any charitable donations... cannot be connected with a Business or Trading Partner”

Payments to Business Partners

All payments made to Business Partners must be proportionate to the services they provide and in line with market practices.

Two particularly important arrangements are:

- Consultancy assignments, which are defined as advisory services bought from external parties in the furtherance of Group interests. These would include assignments associated with the securing of orders or contracts.
- Commissions, which are defined as payments for services provided in the furtherance of Group interests and/or the potential securing of business for Business Units. All commissions must be paid in the best interests of the Group and be in line with market practices.

All payments made in such circumstances are required to be made in line with a formal written legal agreement, which makes clear the service provided, calculation of the payment and the performance obligations required in order to make a payment.

Donations policy

Hunting PLC does not make political donations. Any charitable donations may only be made to a registered charity, which cannot be connected with a Business or Trading Partner.

F: Protecting the Group

The Group relies on the physical protection of its property, plant and equipment, along with its Intellectual Property. To this end, the exchange of information must be made responsibly, with due regard to confidentiality and appropriate records maintained.

External communications

Media enquiries about any Business Unit should be routed to a Senior Manager. No comment should ever be given to the media about Group matters and all enquiries directed to the Hunting PLC Group Finance Director.

Records management

All company records must be maintained to a high standard, ready for scrutiny by internal Group functions or external regulators and auditors. Copies of all communications with regard to major contracts should be kept for a period of 10 years.

Group assets

The Group's physical assets must be handled with care to avoid loss, theft or damage and should only be used for business purposes. Limited personal use is permitted at the discretion of Senior Management.

Confidentiality

The Group relies on certain information remaining confidential. This information includes, but is not limited to:

- Financial information.
- Corporate information.
- Technical information.

Employees may not disclose any confidential information that has come to their attention during the course of their employment. Employees should at all times protect and maintain the confidentiality of the Group's information and that of its Business and Trading Partners, and may only disclose such information as required by law or as is necessary during the course of their duties with the Group.

This obligation will continue at all times both during and after the termination of employment unless and until the information has come into the public domain. This obligation extends to confidential information held by any Hunting PLC employee from previous employments.

“All company records must be maintained to a high standard...”

Intellectual Property

Intellectual Property Rights include copyrights, trademarks, patents, industrial design rights and trade secrets, both in electronic and written form. It is critical that all Intellectual Property held by the Group is kept securely and its confidentiality maintained.

If at any time during the performance of their duties, an employee creates or discovers any Intellectual Property, it shall immediately be disclosed to a Senior Manager to enable necessary protection to be secured.

Third party Intellectual Property Rights shall be respected across all our global operations and improper use of such property is forbidden.

“It is critical that all Intellectual Property held by the Group is kept securely...”



G: Sustainability

Hunting PLC is committed to the highest standards of quality for all of its products and services and for the safety and protection of its employees.

Health, safety and the environment

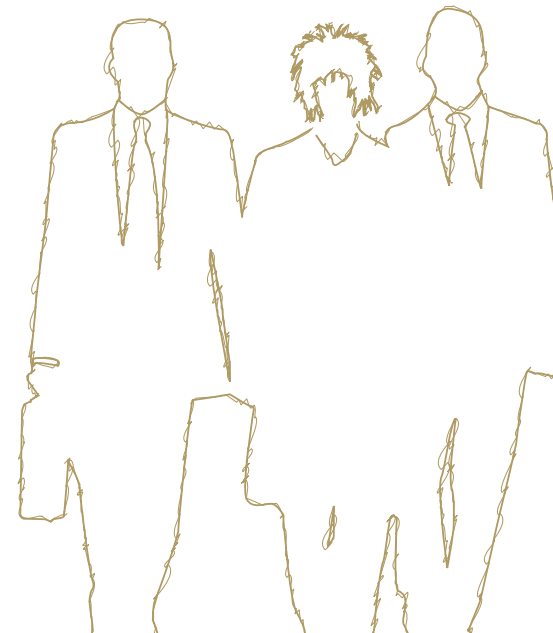
The Group is committed to achieving and maintaining the highest standards of safety for its employees and where relevant, Business Partners, Trading Partners and the public. The Group's goals are to have no accidents, cause no harm to others and have the highest regard for the environment and our footprint.

Each Business Unit must have in place a tailored health and safety programme designed to, at a minimum, comply with local regulatory requirements.

The Group is committed to the protection of the environment by using renewable resources wherever possible, and developing manufacturing processes and procedures, which ensure that adverse effects on the environment are kept to a minimum.

The Group continually looks for opportunities and adopts practices that create a safer and cleaner environment. Environmental concerns must be taken into account in all planning and decision making processes. It is the responsibility of each Business Unit to have in place procedures to encourage the reduction of waste and emissions, and to take into account local environmental issues and the communities in which it operates.

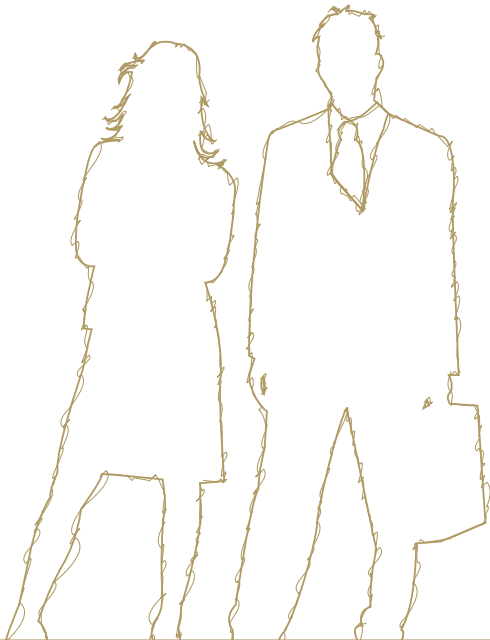
“The Group is committed to sustainability and protection of the environment...”



Data protection

The Group needs to retain information about its employees for purposes connected with their employment and for as long a period as is necessary. The Group may also hold information about an employee's health for the purposes of compliance with health, safety and occupational health obligations.

These uses are consistent with our employment relationship and the principles of global data protection legislation.



The Group will:

- Comply with the legislation impacting protection of personal data and ensure all employees are aware of their responsibilities in that regard.
- Allow all employees to access their personal data on request, subject to any local legislation. The Group will, however, determine reasonable limits when, where and under what supervision access will be granted.
- Release personal data to third parties only if:
 - required to do so by law or court order; or
 - with the written consent of the employee; or
 - required for a valid business reason; or
 - permitted by law.

“The Group will...
Comply with the legislation
impacting protection
of personal data...”

H: Information management

Employees who use the internet, email or any IT services provided by Hunting PLC must do so in a responsible manner, and not put the Group's reputation at risk. Individuals should bear in mind that any transfer of information via these channels can easily fall into the wrong hands. Failure to comply with the Group's IT policies may result in disciplinary action being taken and be regarded, in serious cases, as gross misconduct.

Email

All email systems and communications made on those systems remain the sole property of the Group and consequently should generally only be used for business related purposes. The Group reserves the right to inspect these systems at any time, subject to compliance with local laws.

Employees must not send, forward, distribute or retain email messages that contain language that is abusive, aggressive or offensive. Occasional personal use of the Group's email systems is permitted. However, messages stored in these systems will be treated in the same manner as business-related messages.

Employees must hold due regard for the Intellectual Property of the Group in all communications and holding proprietary company data for personal use is prohibited.

Internet

Responsible use of the internet is to be encouraged for all Group employees and includes the following guidelines:

- When accessing the internet from Group equipment, employees must ensure that they do not use the service in any way which may bring the Group or individuals into disrepute.
- Employees should remember that although one person does not find material offensive, another might.
- Employees should not directly download and then run executable files. Where there is a genuine business benefit to download information, an employee must receive permission from their local IT department before downloading the information and run a virus check.
- Publication of information about the Group or its employees will require approval from a Senior Manager, which will extend to the use of social networking tools. Potential publishers must comply with the Code in all communications and take care not to compromise the Group.

The downloading of pornography or other offensive material is strictly prohibited.

Software

No software should be loaded onto a computer unless it is for business purposes and has been agreed by the local IT department. All software must have an appropriate licence for use.

Copyright

Rules governing the distribution of printed material are subject to the rules issued by the Copyright Licencing Agency and Newspaper Licencing Agency. Photocopying and internal distribution of all published materials is prohibited without prior permission of the publisher.

“All software must have an appropriate licence for use.”



I: Consultation

The Code contains a number of policies, rules and procedures, which support and promote the principles of transparency, honesty and openness which define the Group. Every employee and Business Partner is obliged to consult if they have any doubt about actions taken that might infringe this Code.

If you are unsure

Hunting PLC's success is determined by the behaviour of its employees and Business Partners, but there may be occasions when individuals are unsure of what is right.

The following questions should act as a starting point:

- Does this fit with the Group's Code of Conduct ?
- Is this approach legal in the country I am dealing in ?
- Is this approach safe for my colleagues and me ?
- Does this fit with my personal values and instincts ?
- What would our stakeholders think if this matter was to appear in the media ?
- Have I consulted a Senior Manager ?

Contact information

If you become aware of any breaches of the Code, Hunting PLC has arrangements in place for all employees to raise, in confidence, any concerns they may have.

For all questions on this code, you can contact Bruce Ferguson, the Board's nominated Chief Compliance Officer at:

Telephone: **+44 (0) 20 7321 0123**

Email: **compliance@hunting-intl.com**

Alternatively, you can contact Safecall Limited, a confidential and independent whistleblowing service. Safecall's contact details are posted across the group on staff noticeboards and are as follows:

Telephone: **+44 (0) 191 516 7749**

Email: **huntingplc@safecall.co.uk**

Any employee who fails to report or provide further information about any improprieties will be in breach of the Code and may be subject to disciplinary action. Any employee who reports possible improprieties can do so with the guarantee of confidentiality.

www.huntingplc.com