

Weatherford International plc

# **2017 MODERN SLAVERY STATEMENT & CALIFORNIA SUPPLY CHAINS ACT DISCLOSURE**

# I. OUR ORGANIZATION

#### A. Our Structure, Business & Supply Chain

Weatherford International plc, an Irish public limited company and Swiss tax resident, together with its subsidiaries is a multinational oilfield service company headquartered at Bahnhofstrasse 1, 6340 Baar, Switzerland ("Weatherford," "the "Company," "we," "us" and "our"). Weatherford is one of the world's leading providers of equipment and services used in the drilling, evaluation, completion, production and intervention of oil and natural gas wells. Our principal business is to provide equipment and services to the oil and natural gas exploration and production industry, both on land and offshore, through our principal segments: (1) Drilling & Evaluation, (2) Completions, (3) Well Construction, (4) Production, and (5) Land Drilling Rigs, which together include 14 product lines.

We conduct operations in approximately 90 countries, organized internally into 14 Geozones, and have service and sales locations in nearly all of the oil and natural gas producing regions in the world including in North America, Latin America, Europe, Sub-Sahara Africa, Russia, the Middle East including North Africa, and Asia Pacific. We employ approximately 28,500 employees, and presently have nearly 400 active customers and approximately 33,000 active suppliers globally. Our goods and services are sourced from suppliers in all of the regions where we operate.

#### B. Our Mission and Values

Weatherford delivers innovative technologies and services designed to meet the world's current and future energy needs in a safe, ethical, and sustainable manner. Grounded by our core values and inspired by our world-class people, we are committed to being a trusted business partner to those we serve. Our Core Values are:

- Ethics and integrity
- Discipline and accountability
- Flawless execution
- Collaboration and partnership
- Innovation and technology leadership
- Commitment to sustainability

Our Core Values are publicly available at <a href="http://www.weatherford.com/en/about-us">http://www.weatherford.com/en/about-us</a>.

# II. OUR POLICIES, PROCESSES AND INTERNAL ACCOUNTABILITY RELEVANT TO MODERN SLAVERY

We have a zero-tolerance approach to modern slavery and human trafficking, and we are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking are not taking place in any part of our business or supply chain. To this end, we are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. Our Code of Business Conduct (available at http://www.weatherford.com/en/about-us/ethics-andcompliance) honors these values and our global corporate responsibility relating to modern slavery. Our employees are expected to:

- Respect people, and treat others fairly, consistently, and with respect for the protection of rights and obligations;
- Understand the human rights issues where they work and follow Weatherford's commitment and policies;
- Comply with applicable laws related to working hours and fair wages;
- Not knowingly do business with anyone who engages in forced labor, human trafficking, or the exploitation of any person including children;
- Ensure a culture that promotes internationally recognized standards for human rights and zero tolerance for human rights abuses, and
- Remind suppliers of their obligation to comply with our Supplier Code of Conduct including its human rights provisions.

Our Human Rights Standard (available at http://www.weatherford.com/en/about-us/ethics-andcompliance/human-rights-standard) outlines our policy on Human Rights including modern slavery and our commitment to ensuring our employees and stakeholders are treated with dignity and respect. This standard is guided by international human rights principles found in the Universal Declaration of Human Rights, the Voluntary Principles on Security and Human Rights, and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. Specifically, it requires respect for human rights always, and that all people are treated with dignity and respect, and without discrimination, harassment or retaliation, without exception. Weatherford is committed to respecting, protecting, and fulfilling human rights and fundamental freedoms of those working within or affected by our business. We prohibit all forms of forced, compulsory, child, or other prohibited labor internally and in our supply chain. All work must be completed voluntarily meaning the employee is free to guit, strike, or otherwise cease work in a safe manner compliant with applicable law. The standard also sets for our commitment to compliance with local working hours, wage and safety laws, as well as to protecting data privacy, and allowing freedom of association and collective bargaining. Finally, among its remaining provisions, it requires we identify and monitor potential human rights impacts of our industry, and promote a "speak up" culture valuing transparency. All of these efforts are intended to contribute to combatting modern slavery.

Our Supplier Code of Conduct (available at http://www.weatherford.com/en/about-us/ethics-andcompliance/supplier-code-of-conduct) ("Supplier Code") acknowledges that the strength of Weatherford's reputation is based not only on our own conduct, but also on the behavior of those with whom we do business. For that reason, suppliers are required to acknowledge the Supplier Code, which makes clear that Weatherford will work only with those suppliers, contractors and business partner that share our values and commitment to ethical business practices that comply with all applicable laws. The Supplier Code includes our commitment to universal human rights, including specific prohibitions against the use of forced and compulsory, or anyone held in slavery or servitude, whether adults or children, as well as a commitment to employees' lawful freedom of association and right to collectively bargain.

In addition to our Code, Human Rights Standard and Supplier Code, another core element of our commitment to human rights and combatting modern slavery includes our fostering of an enterprise culture that requires disclosure of non-compliance events, including those relating to modern slavery and fair labor requirements, and protects those who report suspected non-compliance or other abuse of the same. Our existing grievance mechanisms provide a means to track reports of modern slavery breaches and our internal accountability standards ensure that any employee or supplier who breaches the prohibition against modern slavery will face disciplinary action, which could result in dismissal for misconduct or gross misconduct, or termination, as applicable.

Specifically, in addition to promoting open and honest communication lines with management,

Compliance, our Ombuds office, our Employee Relations representatives, and other key functions, our confidential reporting tool, Listen Up, is a resource for employees, customers, suppliers, and all other stakeholders to report conduct that is or may be illegal, unethical, or otherwise violate our Code of Business Conduct or other policies or procedures. Concerns may be reported to the hotline via telephone or internet in over 100 languages, 24 hours a day, 7 days a week, and may be reported anonymously if desired. We promote our hotline through promotional materials at all Weatherford facilities and through Compliance management communications and throughout the enterprise. The organizational justice campaign we initiated in 2017 to bring total transparency to our enterprise ethics and compliance efforts, including our grievance mechanisms and our handling of matters raised through the same, further ensures our employees are confident that matters raised will be taken seriously and addressed as appropriate.

We have a dedicated team of investigators, supplemented by a team of our HR and QHSE professionals who have been trained on investigations, who devote significant resources to investigating grievances and imposing remedial action where necessary to hold violators of Company policies or the law accountable. Our Compliance function monitors and continuously reports matters including any that would relate to modern slavery to our management team and Board of Directors. Remediation efforts regarding substantiated concerns also are reported to management and the Board of Directors to ensure adequate oversight over our handling of accountability for those who, if identified, have perpetrated modern slavery inside the organization or in our supply chain, as well as compensation and justice for victims of modern slavery in such instances.

We know that accessibility and thorough investigative procedures are not the only stepping stones to promoting a "speak up" culture necessary to further our commitment to combatting modern slavery. We believe that everyone at every level of our Company inclusive of our external stakeholders should be able to raise compliance concerns without any fear. To this end, we do not tolerate retaliation against anyone for raising a concern in good faith - zero tolerance for retaliation. We require directors, officers, managers, supervisors, and any other Weatherford leaders and all employees to uphold our commitment, by never retaliating themselves or allowing others to retaliate. Manager-specific training was also launched in 2016 to enhance skills regarding how to effectively listen to and receive employee concerns and complaints so as to ensure no retaliation in response to the same. Our grievance process includes a specific categorization for matters relating to modern slavery.

# III. OUR DUE DILIGENCE AND SUPPLY CHAIN MANAGEMENT

Our enterprise Global Procurement Policy requires that all suppliers providing goods and/or services to Weatherford are reviewed, approved and managed per Weatherford standards. These include having acknowledged and completed the Supplier Code of Conduct described above, prohibiting the use of forced and compulsory labor, or anyone held in slavery or servitude, and requiring a commitment to comply with all applicable laws and the principle of universal human rights. Completion of our supplier onboarding process also is required. The process includes running the supplier through our enterprise screening tool to confirm the supplier is not a restricted party based on international trade regulatory lists issued by government regulatory agencies worldwide or on Weatherford's past experience with the supplier suggesting compliance concerns, which could include modern slavery risks.

In 2016 and 2017, Weatherford began a supplier rationalization project, with the goal of consolidating spend with larger suppliers and reducing our overall supplier footprint. A reduction in suppliers and a focus on larger suppliers reduces modern slavery risk by increasing control checks and transparency into our supply chain. Phase I of this project focused on eliminating suppliers with low spend or infrequent use, and succeeded in reducing our global supplier footprint from approximately 130,000 as of January 2016 to approximately 33,000 as of November 2017. Phase II of this project will delve deeper into the rationalization for the remaining 33,000 suppliers, and we anticipate will further reduce our supplier population.

# IV. OUR MODERN SLAVERY RISK ASSESSMENT AND VERIFICATION

Weatherford views as a journey the global mission to combat modern slavery through heightened corporate focus. We have recently begun this journey, and plan to carry it forward as an ordinary part of our ethics and compliance, supply chain and broader enterprise operations.

We continue to study the risks in this space to verify our modern slavery risk profile. As a result, in undertaking our preliminary risk assessment of our exposures to modern slavery, we consulted various resources and external consultants so that we know in what direction to drive our future efforts. Here are the results of our preliminary risk assessment.

#### A. Industry Risk

While we are not a consumer-driven sector, we do face risks associated with long working hours and the potential for required overtime caused by safety events at our customer rig or well site locations. Our work poses exposure to health and safety risks through hazardous work hence great emphasis is placed on Health, Safety and Environmental compliance processes, reporting mechanisms, remediation of events to ensure a safe work environment. We recognize women are vastly underrepresented in our industry, which poses risks we intend to remedy over time through our Diversity and Inclusive Program.

#### B. Geographic Risk

We consulted numerous indices to obtain a preliminary understanding of the countries, regions and industries in which modern slavery risks may be higher and why, thereby enhancing our risk analysis abilities. We believe there is a direct correlation between geographies subject to enhanced corruption risk and slavery risk due to lacking transparency and effective rule of law. As an oil field services provider we have a presence across many high-corruption risk geographies. Moreover, we have considered risks dependent upon geography, but not necessarily region or country, that affect our modern slavery profile. For example, some of our workforce does work in isolated rig and well site areas. Some exposure to slavery and human trafficking risk is greater in countries where protections against breaches of human rights are limited. We also face seasonality risk in some of our geographic markets where weather limits the duration of the oil and gas drilling season, hence causing fluctuations in our workforce and dependence on contract labor.

#### C. Third-Party Risk

We are blessed to manage a highly skilled workforce in our core oilfield services thereby provoking less direct modern slavery risk. However, we must be vigilant about our indirect risks provoked by ancillary services and manufacturing activities that support our business. We consider at-risk groups relevant to our industry to include: contracted cleaning, catering and landscaping services; static security guards; outsourced manufacturing and similar forms of outsourced labor; hospitality services including hotels and restaurants used by our staff; and construction and related services associated with the building and maintenance of our These and other similar risks could be facilities. exacerbated with business partnerships such as joint ventures where we do not exert majority control.

# V. OUR TRAINING AND CAPACITY-BUILDING APPROACH

Weatherford's new version of its Code of Business Conduct was issued in August 2015 and its Human Rights Standard was issued in May 2017. Employees were required to acknowledge receipt and comprehension of both documents. An online Code of Business Conduct training module also was launched, with completion required for all employees, and supplemented by live training conducted by Compliance to employees across the globe on a risk basis. As noted above, our Code of Business Conduct addresses Weatherford's commitment to human rights and compliance with laws.

In 2017, we also engaged in interactions outside of the Company to develop our exposure to modern slavery and capacity to identify and evaluate risks. For example, we engaged in discussions with third-party service providers to understand tools that may be available to support go-forward risk assessments as part of our anti-modern slavery framework. We also attended an industry benchmarking session regarding the topic of modern slavery with other compliance professionals in the Houston, Texas area.

# VI. OUR ADDITIONAL ACTIONS TO INCREASE EFFECTIVENESS & OUR KPI CONSIDERATIONS

We recognize that the prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. In the immediacy, we intend to take the following actions to supplement our current framework consisting of the policies, processes, due diligence, supply chain management and training described above.

- Enhanced workforce controls: While many of our operations require proof of age for Weatherford employment candidates and confirmation that employees have access to proof of payment of wages in full, we will work in 2018 to survey our operations and implement controls to ensure that proof of age and proof of payment are uniform requirements globally.
- Reduced supplier population: Phase II of the supplier rationalization effort described above provides the Company further opportunity to reduce our modern slavery risk profile through a reduced supplier population. We intend to carry Phase II through our 2018 and report on results

in our next statement.

- Enhanced supplier expectations: We plan to begin in 2018 requiring suppliers to contractually certify their commitment to human rights, including not participating in modern slavery in their own businesses or in their supply chains. We also plan to amend our Supplier Code to expressly and in greater detail communicate our expectations regarding combatting modern slavery.
- Enhanced supplier management: We intend to enhance our onboarding and supplier management review processes, identifying opportunity to inquire regarding and assess high risk suppliers' compliance with the modern slavery obligations we set forth in our Supplier Code, and implementing procedures to do so.
- Enhanced training: We appreciate that training of our employees and management specific to the risks of modern slavery and human trafficking in our enterprise and supply chain would further enhance our efforts to combat the same. Accordingly, in 2018, we plan to train the Weatherford Supply Chain team and an appropriate business population regarding the risks of modern slavery and our commitment to eradicating the same in our supply chain. Such training will enable our team members to assist in the reduction of modern slavery risks.
- Collaborative efforts: Going forward, we will continue to enhance our understanding of modern slavery risks and best practices aimed at minimizing these risks through participation in industry and other corporate conferences, benchmarking sessions, and more informal stakeholder interactions. We look forward to leveraging feedback regarding successes and failures of the variety of approaches that have been initiated in recent years to consider against our own risk profile and increase the variety of our own efforts going forward.

We are committed to further study of our enterprise practices to identify opportunities to combat modern slavery and human trafficking. As a result, we continue to evaluate what would be most effective key performance indicators to monitor and address our modern slavery risk. Our effectiveness in ensuring that slavery and human trafficking is not taking place in our business or supply chains will be measured over time as we deem appropriate after further and continued study of our modern slavery risk profile. We anticipate in 2018 completing the steps identified above as improvements and will hold ourselves accountable accordingly.

### VII. RESPONSIBILITY:

Our Board of Directors has overall responsibility for ensuring that our framework for addressing modern slavery risks complies with our legal and ethical obligations, and that all those under our control comply with it. Management at all levels are responsible for ensuring those reporting to them understand and comply with the policies and procedures relating to this framework and are given adequate and regular training on it and the issue of modern slavery in supply chains.

This statement applies to Weatherford International plc and its UK subsidiaries, including the main operating entity Weatherford U.K. Limited, and is made pursuant to section 54(1) of the Modern Slavery Act 2015, pursuant to the California Transparency in Supply Chains Act of the United States, and pursuant to our enterprise sustainability objectives and constitutes Weatherford's slavery and human trafficking statement for the financial year ending 2017. This statement was approved by the Board of Directors of Weatherford.

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Mark A. McCollum President and Chief Executive Officer November 30, 2017

Francis S. Kalman Weatherford Board of Directors Audit Committee Chair November 30, 2017