



## Employee Complaint Procedures for Accounting and Auditing Matters

### Overview

The Company is committed to complying with all applicable securities laws and regulations, accounting standards, accounting controls and audit practices. Any employee may submit a good faith complaint regarding the Company's accounting or auditing matters without fear of dismissal or retaliation of any kind. To facilitate the reporting of employee complaints, the Company's Audit Committee has established the following procedures for:

- The receipt, retention and treatment of complaints regarding accounting, internal accounting controls or accounting matters, and
- The confidential, anonymous submission by employees of concerns regarding questionable accounting or auditing matters.

### Receipt of Employee Complaints

- Employees with concerns regarding accounting, internal accounting controls or auditing may submit their concerns and or comments via the Union Drilling Confidential and Anonymous [Employee Concern Hotline](#). Messages received are encrypted and will be delivered directly to the Audit Committee for review and appropriate action.

### Matters Covered by this Policy

These procedures relate to employee complaints relating to any questionable accounting or auditing matters, including without limitation, the following:

- fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company;
- fraud or deliberate error in the recording and maintaining of financial records of the Company;
- deficiencies in, or noncompliance with, the Company's internal accounting controls;
- misrepresentation or false statements to, or by, an executive officer or accountant regarding a matter contained in the financial records, financial reports or audit reports of the Company; or
- the failure to fully and fairly report the Company's financial condition.

### Treatment of Complaints

- Upon receipt, all complaints will be reviewed to determine whether the complaint pertains to the Company's accounting, internal accounting controls or auditing matters.
- If possible, receipt of a complaint will be acknowledged to the sender.
- Complaints regarding the Company's accounting, internal accounting controls or auditing matters will be reviewed under the direction of the Audit Committee or such other persons as the Audit Committee determines to be appropriate. Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review.
- Prompt and appropriate corrective action will be taken when and as warranted, as determined by the Audit Committee.
- The Company will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any employee in the terms and conditions of employment based upon any lawful actions of such employee with respect to good faith reporting of complaints regarding the Company's accounting, internal accounting controls or auditing matters or otherwise as specified in Section 806 of the Sarbanes-Oxley Act of 2002.

### Reporting of Complaints and Investigations

A log of all complaints will be maintained, tracking their receipt, investigation and resolution, and a report thereof shall be prepared and presented to the Audit Committee on a quarterly basis, or more frequently if necessary. Copies of complaints and such log will be maintained in accordance with the Company's document retention policy.