



## WEATHERFORD INTERNATIONAL PLC

### BOARD OF DIRECTORS

#### CORPORATE GOVERNANCE PRINCIPLES

Amended and restated as of May 26, 2021

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In accordance with the Nominating and Governance Committee charter, Weatherford International plc (“Weatherford” or the “Company”) has adopted the following corporate governance principles. Together with the charters of the committees (each a “Committee” or, collectively, the “Committees”) of the Board of Directors (the “Board”) and Weatherford’s corporate policies, these principles serve as the foundation and guidelines for the governance of Weatherford. These principles do not supersede, replace or affect the provisions in the Company’s Memorandum of Association and Articles of Association (collectively, the “Articles”).

Typically elected annually by our shareholders at our annual general meeting of shareholders, the Board is charged with providing effective governance over Weatherford’s affairs to the benefit of its shareholders. The Board serves as the ultimate decision-making body of Weatherford, with the exception of those matters specifically reserved for our shareholders. The Board appoints and advises our Chief Executive Officer (“CEO”), who leads and implements strategy and supervises those responsible for the day-to-day conduct of our business. The long-term interests of our shareholders guide the Board of Directors in its decision-making process.

In addition to other Board or Committee responsibilities outlined below, the responsibilities of the Board include the following (all of which may be delegated to one or more Committees by charter or Board practice, subject to any limitations under the Articles or any applicable listing standards (as defined below), laws or regulation):

- reviewing, monitoring and approving the overall operating, financial and strategic plans, operating goals and performance of the Company and significant corporate actions;
- together with the CEO, reviewing the job performance of elected corporate officers and other senior executives on an annual basis;
- reviewing the outside activities of senior executives;
- selecting, evaluating, retaining and compensating the CEO, and providing oversight of the selection, evaluation, retention and compensation of the other executive officers;
- overseeing appropriate policies of corporate conduct and compliance with laws;
- periodically assessing the effectiveness of policies to facilitate communication between shareholders and directors;
- reviewing the major risks facing the Company and helping develop strategies to address these risks;
- overseeing the operation and implementation of reasonable information and reporting systems or controls designed to inform of material risks;
- discussing and being apprised of the Company’s position on issues related to environmental, corporate social responsibility, public policy and philanthropy;
- reviewing the process by which financial and non-financial information about the Company is provided to management, the Board and the Company’s shareholders; and
- establishing policies designed to maintain the financial, legal and ethical integrity of the Company.



The Company's senior executives, under the direction of the CEO, are responsible for the operations of the Company, implementing the strategic, financial and management policies of the Company, identifying, assessing and managing risk and risk mitigation strategies, preparing financial statements and other reports that accurately reflect requisite information about the Company and providing timely reports which inform the Board about the foregoing matters. The Board provides oversight of the CEO and the Company's senior executives under the CEO's direction.

## Board composition

*Size of the Board.* The Board will periodically review the appropriate size of the Board based on recommendations from the Nominating and Governance Committee. The Articles currently provide that the authorized number of directors will be not less than three nor more than fourteen. Each member of the Board is subject to election annually by the shareholders.

*Majority of independent directors.* A majority of the directors serving on the Board will meet the standards for director independence set forth in the Nasdaq Stock Market listing standards as the same may be amended from time to time (the "listing standards"), as well as other factors not inconsistent with the listing standards that the Board considers appropriate for effective oversight and decision-making by the Board.

*Affirmative determination of independence.* The Board will affirmatively determine annually and at other times required by the listing standards that the directors designated as independent have no material relationships to the Company (either directly or with an organization that has a relationship with the Company for which such director is a partner, shareholder, officer or is financially interested) that may interfere with the exercise of their independence from management and the Company. Directors serving on certain Committees may be required to meet additional requirements as specified in the charter for that Committee.

Material relationships include commercial, industrial, banking, consulting, legal, accounting, charitable and familial relationships. In addition, in affirmatively determining independence of any member of the Compensation & Human Resources Committee, the Board must consider all factors specifically relevant to determining whether a director has a relationship with us which is material to that director's ability to be independent from management in connection with the duties of a member of the Compensation & Human Resources Committee, including, but not limited to, the factors set forth in Section 5605(d)(2) of the listing standards.

*Board membership criteria.* The Board's policy is to encourage selection of directors who will contribute to the Company's overall corporate goals. The Board and the Nominating and Governance Committee will from time to time review the experience and characteristics appropriate for Board members and director candidates in light of the Board's composition at the time and skills and expertise needed for effective operation of the Board and its Committees.

Directors are selected for their character and judgement, performance, expertise, experience, qualifications, attributes, skills, tenure and willingness to serve actively, as well as other factors established by the Nominating and Governance Committee.

*Ethics:* Directors should be persons of good reputation and character who conduct themselves in accordance with high personal and professional ethical standards, including the policies set forth in the Company's Code of Business Conduct. Any waiver of any ethics policy for any director, executive or accounting officer must be approved by the Board and must be disclosed promptly to shareholders.

*Business and professional activities:* Directors should maintain a professional life active enough to keep them in contact with the markets, the business and technical environments and the communities in which the Company is active. Because this exposure is a main factor in selecting and retaining directors, a significant position or title change will be seen as reason to review a director's membership on the Board. However, the Board does not believe that directors who retire from or change their principal occupation or business should necessarily be required to end their service as directors. Any significant change in a director's position or title will be reviewed by the Board (or such Committee to which such review has been delegated) to determine the appropriate action, if any, to be taken.



*Experience, qualifications and skills:* Directors should have experience, qualifications and skills relevant for effective management and oversight of the Company's senior executives, which could be acquired through education, training, experience, self-study or other means such as experience at senior executive levels in comparable companies, public service, professional service firms, educational institutions or other organizations.

*Time:* Directors should have the time and willingness to carry out their duties and responsibilities effectively, including time to study informational and background material and to prepare for meetings. Directors should attempt to arrange their schedules to allow them to attend all scheduled Board and Committee meetings and the Company's annual general meeting of shareholders.

*Diversity:* The Board believes that diversity, including differences in backgrounds, qualifications, and personal characteristics such as gender, ethnicity, country of citizenship and age, is important to the effectiveness of the Board's oversight of the Company.

*Conflicts of interest:* Each director should not, by reason of any other position, activity or relationship, be subject to any conflict of interest that would impair the director's ability to fulfill the responsibilities of a member of the Board.

*Director membership on other corporate boards.* Directors may not serve on more than four other public company boards. A director who serves as our Company's CEO may not sit on more than one other public company boards. A director may not serve as a member of the audit committee of more than two other public companies unless the Board determines that such simultaneous service will not impair the ability of such director to effectively serve on the Audit Committee, and this determination is disclosed in the Company's annual proxy statement. A director should advise the Chairperson (as defined below) of the Nominating and Governance Committee in advance of accepting an invitation to serve on another company's board and any change in their existing status as a director on any other board or member of another company's audit committee.

## **Selection, tenure and retirement of Board members**

*Selection of Board nominees.* The Board has overall responsibility for the selection of candidates for nomination or appointment to the Board, provided that nominees for election by the shareholders and appointees to fill Board vacancies will be approved by a majority of the independent directors. The Nominating and Governance Committee will recommend director candidates to the Board for nomination or appointment. The Nominating and Governance Committee will determine the individuals to be nominated to serve on the Company's Board for election by shareholders at each annual general meeting of shareholders, and to be appointed to fill vacancies on the Board, subject to approval by the Board which will include approval by a majority of the independent directors and subject to legal rights, if any, of third parties to nominate or appoint directors.

*Election of directors.* The Articles provide for a majority voting standard in an uncontested election of directors. In such uncontested elections, directors are elected by a majority of the votes cast, which means that the number of ordinary shares voted "for" a director must exceed the number of ordinary shares voted "against" that director.

In contested elections (i.e., where the number of director nominees exceeds the number of directors to be elected), directors are elected by a plurality of the votes of the ordinary shares represented in person or by proxy at the meeting and entitled to vote on the election of directors.

*Length of Board service.* The Board, based on recommendations by the Nominating and Governance Committee, will review each director's continuation on the Board every year. This review will include determination of independence as well as consideration of skills, experience, number of other public and private company boards on which the individual serves, composition of the Board at that time, history of attendance and effectiveness at meetings attended and other criteria in the context of the needs of the Company and the membership requirements described above. No director shall serve on the Board for more than 12 years.



*Change in status of Board members.* The Board does not believe that directors who retire from or change their principal occupation or business should necessarily be required to end their service as directors. If any director retires from or changes their principal occupation or business or an independent director accepts or intends to accept a directorship with another company that he or she did not hold when most recently elected to the Board, the director must promptly notify the Board or the Nominating and Governance Committee, which will review the change in status and recommend to the Board the appropriate action to be taken, if any, in light of the individual circumstances. The affected director is expected to resign if requested to by the Board or the Nominating and Governance Committee after such review.

*Retirement.* It is the policy of the Company that there shall be no mandatory retirement age for an independent director.

*Succession planning.* The Nominating and Governance Committee shall have the primary responsibility for developing a succession plan for the Board and making recommendations to the full Board on director succession matters. In so doing, the Nominating and Governance Committee will determine the appropriate and desirable mix of characteristics, skills, expertise, diversity and experience for the full Board and each of its Committees, taking into account the qualifications of both existing directors and opportunities to nominate others for election.

## **Board leadership**

*Chairperson and Lead Independent Director.* The Board will periodically appoint a Chairperson of the Board (the “Chairperson”). Both independent and management directors, including the CEO, are eligible for appointment as the Chairperson. If the Chairperson is not an independent director, the Board considers it to be useful and appropriate to designate an independent director to serve in a lead capacity (the “Lead Independent Director”) to coordinate the activities of the other independent directors and to perform such other duties and responsibilities as the Board may determine. The Lead Independent Director will be elected by a majority of the independent directors of the Board for a renewable one-year term. Such term shall generally commence at the first Board meeting after the annual general meeting of shareholders and end immediately prior to the next annual general meeting of shareholders. The Company will appropriately disclose the name of the Lead Independent Director and the method by which all interested parties may contact the independent directors.

*Board and Committee meetings.* All meetings of and other actions by the Board and its Committees shall be held and taken pursuant to the Articles, including provisions governing notice of meetings and waiver thereof, the number of Board members required to take actions at meetings and by written consent, and other related matters as per the provisions set forth under the headings “Meetings of Directors and committees,” “Committees” and “Written resolutions and telephonic meetings of the Directors” in the Articles.

*Agenda.* The Chairperson will have primary responsibility for establishing the agenda for each meeting and arranging for the agenda to be sent in advance of the meeting to the directors along with appropriate written information and background materials. The Chairperson and CEO set the agenda for Board meetings with the understanding that certain items pertinent to the advisory and monitoring functions of the Board shall be brought periodically by the Chairperson and CEO for review and/or decision. Each Committee, and each individual director, is encouraged to suggest items for inclusion on the agenda. In addition, the Chief Compliance Officer may request that an item (including a report or update from the Chief Compliance Officer) be included on the agenda of any Committee and/or the Board meeting. Agenda items that fall within the scope of responsibilities of a Committee will be reviewed with the chairperson of that Committee. The Chairperson and the full Board separately have authority to require the Board to meet in executive sessions outside the presence of management to discuss sensitive matters with or without distribution of written materials.

Board materials related to agenda items will be provided to Board members sufficiently in advance of Board meetings where necessary to allow the directors to prepare for discussion of the items at the meeting.

At the invitation of the Board, members of senior management recommended by the Chairperson and CEO attend Board meetings or portions thereof for the purpose of participating in discussions. Generally,



presentations of matters to be considered by the Board are made by the manager responsible for that area of Weatherford's operations.

*Meetings of independent directors.* Independent directors will meet on a regularly scheduled basis, at least twice a year, in executive sessions without the CEO or other members of the Company's management present.

In the event the Chairperson of the Board and CEO roles are combined, the Lead Independent Director shall:

- review Board meeting schedules and agendas in collaboration with the Chairperson to assure that there are an adequate number of scheduled meetings and sufficient time for discussion of all agenda items as well as the inclusion of topics deemed important by the independent directors and sufficiently scheduled executive sessions;
- preside at all meetings of the Board at which the Chairperson is not present, including executive sessions of the independent directors;
- call for executive sessions of the Board's independent directors, if and when deemed appropriate;
- serve as principal liaison and supplemental channel of communication between the independent directors and the Chairperson, in addition to direct communications between the Chairperson and other Directors;
- be available for communication with shareholders, in coordination with management, when appropriate;
- approve and coordinate the retention of outside advisors and consultants who report directly to the independent directors, except as otherwise required by applicable law or the listing standards; and
- interview director candidates along with the Nominating and Governance Committee.

If the Lead Independent Director is not present at any meeting of the Board, a majority of the independent directors present shall select an independent director to act as Lead Independent Director for the purpose and duration of such meetings.

*Annual review.* The Board will conduct an annual assessment of its leadership structure to determine that the leadership structure is the most appropriate for the Company.

## **Board compensation**

*Compensation.* The Compensation & Human Resources Committee with the assistance of independent compensation consultant, will annually recommend to the Board compensation programs for independent directors and the Lead Independent Director (if one is appointed), Committee Chairpersons, and Committee members, consistent with any applicable requirements of the listing standards for independent directors and including consideration of cash and equity components of this compensation. The Board will determine the form and amount of independent director compensation while seeking to fairly pay directors for work required in a company comparable in size and scope with the Company and to align directors' interests with the long-term interests of shareholders.

## **Board Committees**

*Committees.* It is the general policy of Weatherford that the Board as a whole considers all major decisions. As a consequence, the Committee structure of the Board is limited to those committees considered to be basic to or required for the operation of a publicly owned Company. The Committees of the Board are the Audit Committee, the Compensation & Human Resources Committee, the Safety, Environment and Sustainability Committee and the Nominating and Governance Committee. The Board may from time to time establish additional Committees.



*Committee member selection.* After considering the recommendations of the Nominating and Governance Committee, the Board will designate the members and the chairperson of each Committee, endeavoring to match the Committee's function and needs for expertise with individual skills and experience of the appointees to the Committee. Each member of the Audit Committee, Compensation & Human Resources Committee and Nominating and Governance Committee will be independent as defined in any applicable listing standards, laws and regulations.

*Committee functions.* Each Committee will have a written charter approved by the Board in compliance with applicable listing standards, laws and regulations. The number and content of Committee meetings and means of carrying out Committee responsibilities will be determined by each Committee in light of the Committee's charter, the authority delegated by the Board to the Committee, and legal, regulatory, accounting and governance principles applicable to that Committee's function. The Company will afford access to the Company's employees, professional advisers, and other resources, if needed, to enable Committee members to carry out their responsibilities.

*Audit Committee financial expert/financial literacy.* The Audit Committee should have at least one member that qualifies as an "audit committee financial expert" as defined by applicable rules of the SEC under Section 407 of the Sarbanes Oxley Act and all members should be "financially sophisticated" in accordance with the listing standards. The Board shall be responsible for determining the qualification of individuals who serve on the Audit Committee as a designated "audit committee financial expert" and whether such persons are "financially sophisticated." In light of this responsibility of the Board, the Nominating and Governance Committee shall coordinate closely with the Board in screening any new candidate and in evaluating whether to re-nominate any existing director who may serve in this capacity.

*Self-Evaluation.* Each Committee is responsible for preparing an annual performance self-evaluation to determine if the Committee is functioning effectively. Each director is responsible for completing an annual assessment of the effectiveness of the Board and Committees on which they serve. The Corporate Secretary shall oversee the process of the annual evaluations, as well as the annual performance reviews completed by each independent director. The Board and each Committee shall review the results of the evaluations to determine what actions should be taken to improve Board and Committee performance.

## **Director responsibilities**

*General responsibilities.* A director is expected to discharge his or her director duties, including duties as a member of a Committee on which the director serves, in good faith and in a manner the director reasonably believes to be in the best interests of the Company.

The Board generally has four scheduled meetings each year to review and discuss reports by management on Weatherford's strategy, performance, business plans and prospects, and any other relevant business. Each director is expected to attend all scheduled Board and Committee meetings as well as the annual general meeting of shareholders, and to review meeting materials in advance.

*Disclose relationships.* Each independent director is expected to disclose promptly to the Board any existing or proposed relationships with the Company (other than service as a Board member or on Board Committees) which could affect the independence of the director under applicable listing standards or any additional standards as may be established by the Board from time to time, including direct relationships between the Company and the director and his or her family members, and indirect relationships between the Company and any business, nonprofit or other organization in which the director is a general partner or manager, officer, or significant shareholder or is materially financially interested. The Board will resolve any conflict of interest question involving the CEO, and the CEO will resolve any conflicts of interest questions involving any other officer of the Company.

*Confidentiality.* Directors have an obligation to protect and keep confidential all non-public information related to the Company (the "confidential information") unless and until the Board has authorized disclosure (or unless otherwise required by law or regulation). Confidential information includes all non-public information entrusted to or obtained by a director by reason of his or her position on the Board, such as information regarding the strategy, business, finances and operations of the Company, minutes, reports and materials of the Board and its Committees, and other documents identified as confidential by the Company, including but not limited to non-public information concerning: (1) the Company's financial



condition, prospects or plans, its marketing and sales programs and research and development information, as well as information relating to acquisitions, divestitures and actions relating to the Company's stock; (2) possible transactions with other companies or information about the Company's suppliers, licensors or joint venture partners, which the Company is under an obligation to maintain as confidential; and (3) the proceedings and deliberations of the Board and its Committees, and the discussions and decisions between and among employees, officers and directors.

Directors may not use confidential information for personal benefit or to benefit other persons or entities other than the Company. Directors should refrain from disclosing confidential information without the authorization of the Board or the Chairperson, unless otherwise required by law or regulation. The obligations described above continue even after service on the Board has ended.

*Reporting and compliance systems.* Based on information available to the director, each director should be satisfied that Company management maintains an effective system for timely reporting to the Board or appropriate Board Committees on the following: (1) the Company's financial and business plans, strategies and objectives; (2) the recent financial results and condition of the Company and its business segments; (3) significant accounting, regulatory, competitive, litigation and other external issues affecting the Company; and (4) systems of control which promote accurate and timely reporting of financial information to shareholders and compliance with laws and corporate policies. Each director is expected to have a basic understanding of the foregoing matters to the extent information is furnished by management or otherwise available to the Board.

*Preparation and attendance.* Board members are expected to devote sufficient time and attention to prepare for, attend and participate in Board meetings and meetings of Committees on which they serve, including advance review of meeting materials that may be circulated prior to each meeting. Board members are expected to attend the annual general meeting of shareholders absent special circumstances.

*Hedging and pledging.* Directors, officers and certain employees who have access to inside information (including employees with knowledge of financial, legal and transactional information of Weatherford) and who are notified that they have been designated as "Insiders" and members of their immediate families or households may not trade in options, warrants, puts and calls or similar instruments on Weatherford securities or sell Weatherford securities "short." Short sales are defined as sales of securities that are not then owned, including a "sale against the box," defined as a sale with a delayed delivery. Directors and members of their immediate families or households may not hold Weatherford securities in an account subject to a margin call or pledge Weatherford securities as collateral for a loan.

*Communication with stakeholders.* The CEO is responsible for establishing effective communications with Weatherford's stakeholder groups (i.e., shareholders, customers, communities, suppliers, creditors and other debtholders, governments and corporate partners). It is the policy of Weatherford that management speaks for Weatherford. This policy does not preclude independent directors from meeting with shareholders or other groups on behalf of Weatherford, but any such meetings will be coordinated in advance with management and it is suggested that management be present at any such meeting.

*Access to information.* The Company's management will afford each Board member access to the Company employees and the outside auditors, legal counsel and other professional advisers for any purpose reasonably related to the Board's responsibilities. Each director is entitled to inspect the Company's books and records and obtain such other data and information as the director may reasonably request; inspect facilities as reasonably appropriate for the performance of director duties; and to receive notice of all meetings in which a director is entitled to participate and copies of all Board and Committee meeting minutes.

*Independent inquiries and advisers.* The Board is authorized to conduct investigations, and to retain, at the expense of the Company, outside legal, accounting, investment banking or other professional advisers for any matters relating to the responsibilities of the Board. Each of the Board's standing Committees has similar authority to retain outside advisers as each determines appropriate, as set forth in the respective Committee's charter.

*Reliance on information.* In discharging responsibilities as a director, a director is entitled to rely in good faith on reports or other information provided by Company management, independent auditors, advisors



and other persons as to matters the director reasonably believes to be within such other person's professional or expert competence and who has been selected with reasonable care by or on behalf of the Company.

*Transactions affecting director independence.* Without the prior approval of a majority of disinterested members of the full Board, and, if required by the listing standards, the Company will not make significant charitable contributions to organizations in which a director or a family member of the director is affiliated, enter into consulting contracts with (or otherwise provide indirect forms of compensation to) a director or enter into any relationships or transactions (other than service as a director and Board Committee member) between the Company and the director (or any business or nonprofit entity or organization in which the director is a general partner, controlling shareholder, officer, manager, or trustee, or materially financially interested). Notwithstanding the foregoing, to the extent required to comply with SEC rules, no member of the Audit Committee will be an affiliated person of the Company or receive any direct or indirect compensation from the Company other than for service as a director and on Committees on which the individual serves, and each such member will otherwise meet the independence requirements set forth in the Audit Committee charter. Additionally, all members of the Compensation & Human Resources Committee must meet the independence requirements for Committee membership as determined by applicable SEC rules and listing standards and as set forth in the Compensation & Human Resources Committee charter.

*Continuing education.* The Board is expected periodically to review the Company's policies and procedures of the Company. Additionally, the Company is responsible for providing orientation sessions for newly elected or appointed directors and to recommend, on an as-needed basis, continuing director education programs for Board or Committee members.

*Annual evaluation.* The Board, in conjunction with the Nominating and Governance Committee, will evaluate these corporate governance principles and whether the Board and its Committees are functioning effectively at least annually.

*Risk oversight.* The Board should understand the principal risks associated with the Company's business on an on-going basis and it is the responsibility of management to assure that the Board and its committees are kept well informed of these changing risks on a timely basis. It is important that the Board oversee the key risk decisions of management, which includes comprehending the appropriate balance between risks and rewards. The Board reserves oversight of the major risks facing the Company and has delegated risk oversight responsibility to the appropriate Committees related to matters considered by the Committees.

## **Management responsibilities**

*Management succession planning.* At least annually, the Compensation and Human Resources Committee will consider and assist the Board in developing succession plans for the CEO and other key executive officers and appropriate management personnel. At least one executive session of the Board each year will include a review and evaluation of CEO recommendations. Additionally, an annual review of the CEO Emergency Succession Plan will also be completed. The Board may from time to time ask the Compensation and Human Resources Committee to undertake other specific reviews concerning management succession planning. The CEO also reviews management succession and development plans for executive officers with the Board.

*Financial reporting and legal compliance.* The Board's functions are of governance and oversight. Company's management is responsible for (1) making and keeping books, records and accounts, which, in reasonable detail, accurately and fairly reflect the transactions and dispositions of the assets of the Company; (2) devising and maintaining an effective system of internal accounting controls; (3) devising and maintaining effective disclosure controls and procedures and internal control over financial reporting; (4) preparing financial statements that are accurate and complete and fairly present the financial condition, results of operation and cash flows of the Company; and (5) devising and maintaining systems, procedures and corporate culture which promote compliance with legal and regulatory requirements and the ethical conduct of the Company's business.

*Communication of corporate governance principles.* As required by the listing standards, management will assure that the Company's website will include a copy of these principles, copies of the charters of the



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Audit, Compensation & Human Resources, and Nominating and Governance Committees and, if applicable, other key Committees of the Board, and a copy of the Company's Code of Business Conduct. Management will also include in the Company's annual report to shareholders statements to the effect that this information is available on the Company's website and provide printed copies of this information to any shareholder who requests it.

*Reporting Concerns.* Employees concerned about Weatherford's conduct, including any potential violations of laws, rules, regulations or Weatherford's policies, should discuss the issue with a supervisor, manager or other appropriate person. Concerns may be submitted on a confidential or anonymous basis by employees and may be sent by e-mail or in writing, although a contact name and number is appreciated. If an employee provides contact information, he or she will receive an acknowledgment of receipt of the complaint or concern. Contact information will remain confidential and will only be used if additional questions are required to complete an internal investigation. The Company will at all times act in good faith to protect the anonymity of reports, unless otherwise required by law or if the Company believes the report was not made in good faith. Concerns also may be submitted to Listen Up, an external and completely independent service. Concerns may be submitted to Listen Up online, by mail or by phone. More information is available on Weatherford's website at [www.ListenUpWFT.com](http://www.ListenUpWFT.com). Weatherford's policies prohibit any employee from retaliating or taking any adverse action against any employee for making or helping to resolve reports made in good faith. All reported compliance and ethics concerns regarding accounting controls, auditing matters, the Code of Business Conduct or other similar matters will be sent to the Assurance Department and the Compliance Group. All concerns and complaints are then reported to the Audit Committee.

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