



NABORS INDUSTRIES LTD.

PROCEDURES FOR REPORTING CONCERNS TO THE BOARD

An employee or shareholder who has a concern about the Company's conduct, or a complaint about the Company's accounting, internal control or auditing matters, may communicate that concern directly to the Lead Director, to the outside directors as a group, or to the Audit Committee. Such communications may be confidential or anonymous, and may be submitted in writing in care of the Corporate Secretary, or reported by phone to the Nabors Hotline, established specifically for reporting policy concerns, at 1-877-NABORS7.

Hotline calls relating to accounting, internal controls, auditing or officer conduct are reported by our independent administrator directly to the Chairman of the Audit Committee. The status of all outstanding concerns raised with any director or group of directors will be reported to the Lead Director, and in the case of concerns relating to accounting, internal control, or auditing, to the Chairman of the Audit Committee, on at least a quarterly basis. The Lead Director or Chairman of the Audit Committee may direct that certain matters be presented to a committee or the full Board and may direct special treatment, including the retention of outside advisors or counsel, for any concern addressed to them.

Nabors' Code of Business Conduct prohibits any employee from retaliating or taking any adverse action against anyone for raising or helping to resolve an integrity concern.