POLICY FOR COMPLAINT AND REPORTING PROCEDURES FOR ACCOUNTING AND COMPLIANCE MATTERS

PURPOSE

Civeo Corporation and its subsidiaries (the "Company") are committed to providing a safe and productive work environment and promoting a culture which encourages its employees and other reporting persons to disclose matters concerning illegal or improper conduct within the Company. Any reporting person of the Company may submit a good faith complaint or report regarding Accounting Matters (as defined below) or Compliance Matters (as defined below) to the management of the Company without fear of dismissal or retaliation of any kind. The Company is committed to achieving compliance with all applicable securities laws and regulations, accounting standards, accounting controls and audit practices. The Audit Committee of the Company's Board of Directors ("Audit Committee") will oversee treatment of employee concerns in this area.

"Reporting persons" as used in this policy includes employees of the Company and, with respect to personnel in Australia, Whistleblowers (as defined in Appendix I). Reporting persons located in Australia should review Appendix I hereto for special reporting requirements in Australia.

A copy of this policy is available to employees of the Company on *Beacon* and is also available on the Company's website at: www.civeo.com.

GUIDELINES

In order to facilitate the reporting of complaints by reporting persons, the Company's Audit Committee has established the following procedures for (1) the receipt, retention and treatment of complaints received by the Company regarding accounting, internal accounting controls, or auditing matters ("Accounting Matters"), (2) the receipt, retention and treatment of complaints received by the Company regarding potential violations of applicable laws, rules and regulations or of the Company's codes, policies and procedures ("Compliance Matters") and (3) the confidential, anonymous submission by reporting persons of concerns regarding questionable Accounting Matters or Compliance Matters.

Scope of Matters Covered by These Procedures

These procedures relate to complaints and reports by reporting persons relating to any questionable Accounting 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 statement to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports (including discussions in quarterly and annual reports filed with the Securities and Exchange Commission) or audit reports of the Company; and

- deviation from full and fair reporting of the Company's financial condition.

These procedures also relate to complaints and reports by reporting persons relating to any questionable Compliance Matters, including, without limitation, the following:

- applicable laws, rules and regulations;

- listing standards of the New York Stock Exchange applicable to domestic listed companies;

- the Company's Financial Code of Ethics for Senior Officers (as the same may be amended);

- the Company's Corporate Code of Business Conduct and Ethics (as the same may be amended);

- the Company's Corporate Governance Guidelines (as the same may be amended);

- the Company's Policy on Management and Disclosure of Material, Non-Public Information (as the same may be amended);

- the Company's Policy on Insider Trading (as the same may be amended); and

- the Company's Policy on Compliance with Short-Swing Trading and Reporting Laws (as the same may be amended).

The above lists are not exhaustive. Any concerns regarding unethical or improper conduct should be reported using the guidelines described in this policy.

Please also refer to the additional information contained in Appendix I hereto that further details the type of conduct which can be reportable in Australia.

Reporting Procedures for Complaints and Reports

Reporting a Complaint

Reporting persons with concerns regarding questionable Accounting Matters or Compliance Matters may report their concerns anonymously or otherwise to the Chief Financial Officer of the Company or the Audit Committee by using one of the following methods:

- by calling the 24-hour-a-day, 7-day-a-week, multilingual global Ethics Line. The

hotline and online reporting tool are administered by a third-party provider and anyone reporting a concern in good faith is protected from retaliation under Company Policy and in a number of countries by legislation.

Australia	1800-245-177
Canada	1-833-724-7532
United States	1-855-866-2133

To call from a country not listed above please visit http://www.business.att.com/bt/access.jsp to find your country access code. Once the access code is found, dial the code and when you hear the English-speaking operator or series of prompt tones, dial the Hotline number 1-855-866-2133 to connect with the Ethics Line.

- reporting known or suspected violations online at: https://civeo.ethicspoint.com
- by sending an envelope marked "confidential" to the Company:

  Civeo Corporation
  Three Allen Center
  333 Clay Street, Suite 4980
  Houston, Texas 77002
  Attn: Chief Financial Officer or Audit Committee (as appropriate)

If an anonymous report is made through the online third-party provider, you will receive a unique reference. This will allow you to contact the relevant third-party provider to provide further information or request an update at any time without having to disclose your identity. If a reporting person has not used the third-party provider service but has provided the Company with some means of contacting them (even if anonymously), then the Company will provide updates through this method; however, if no contact details have been provided, then the Company will likely not be able to update the reporting person.

Form of Complaint or Report

Although a complaint or report can be made verbally, it is preferable for it to be made in writing and include the following information:

- the department or business unit/company that the complaint or report relates to;
- a description of the complaint or report;
- times, dates and locations of incidents;
- names (or descriptions if no names are available) of people who have engaged in the questionable matter; and
- any supporting evidence, emails, texts, correspondence, documents, photos, videos etc.

Treatment of Complaints and Reports

Upon receipt of a complaint or report, the Chief Financial Officer or the Audit Committee, as applicable (or their respective designee(s)), will (1) determine whether the complaint or report pertains to Accounting Matters or Compliance Matters and (2) when possible, acknowledge receipt of the complaint to the sender. Complaints relating to Accounting Matters will be reviewed under Audit Committee direction and oversight by the internal audit department or such other persons as the Audit Committee determines to be appropriate. Complaints relating to Compliance Matters will be reviewed under the direction and oversight of the Chief Financial Officer by such persons as the Chief Financial Officer determines to be appropriate. Prompt and appropriate corrective action will be taken when and as warranted in the judgment of the Audit Committee and/or the Chief Financial Officer.

Confidentiality

Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review. The Company may disclose the information contained in a disclosure with or without the reporting person's consent if:

- the information does not include the reporting person's identity;
- the Company has taken all reasonable steps to reduce the risk that the reporting person will be identified from the information; and
- it is reasonably necessary for investigating the Accounting Matter or Compliance Matter.

Protections for Reporting Persons

Any reporting person who reports a complaint should not be concerned about experiencing any adverse consequences for having done so. Employees will not be penalized or retaliated against in any way with regard to their employment, nor harassed or threatened for reporting such concerns. As part of its compliance program, the Company must rely on its employees and other reporting persons to bring to its attention any conduct that might violate legal requirements or internal policies.

The Company will not tolerate and strictly prohibits any conduct that causes detriment (or any threat to cause detriment) to a reporting person. Detriment includes but is not limited to:

- dismissal of an employee;
- injury of an employee in his or her employment;
- alteration of an employee's position or duties to his or her disadvantage;
- discrimination, harassment or intimidation;
- harm or injury to a person, including psychological harm;
- damage to a person's property, reputation, business or financial position; or
- any other damage to a person.

In addition to this policy prohibiting such retaliation, the Sarbanes-Oxley Act of 2002 and other laws protect employees who report violations of certain laws (such as rules and regulations

of the Securities and Exchange Commission or anti-fraud statutes) from retaliation with respect to their employment.

The Company also has the following measures in place for protecting the confidentiality of a reporting person's identity (subject to the exemptions described above under "Confidentiality"):

- Ensuring the Chief Financial Officer and the Audit Committee (and other persons involved in investigating any disclosures under this policy) are aware of, and comply with, confidentiality obligations when dealing with complaints or reports under this policy.
- Ensuring any personal information or reference to a reporting person in reports will be redacted.
- Having in place secure record-keeping processes including:
  - all paper and electronic documents and other materials relating to disclosures will be stored securely; and
  - access to all information relating to a disclosure will be limited to those directly involved in managing and investigating the disclosure.

Utilizing the third-party provider services referred to above under "Reporting Procedures for Complaints and Reports" helps ensure that any reports or complaints made through the services are kept confidential.

Employee Assistance Programs

In addition to the measures described under "Protections for Reporting Persons," there are two Employee Assistance Programs that offer confidential and voluntary counselling service provided to employees of Civeo. Complete confidentiality is assured and maintained. Counsellors are strictly bound by a professional code of ethics which prevents them from giving out information without written consent. Contact details are as follows:

Employee & Family Assistance Program (EFAP)	Employee Assistance Program (EAP)
Canada – Homewood Health Toll Free 1800 663 1142 www.homewoodhealth.com United States – ComPsych Corporation Toll Free 1800 697 0353 www.guidanceresources.com	Australia – ASSURE (Freecall) 1800 808 374 Manager Support Program (Freecall) 1800 505 015 Email: info@assuraprograms.com.au

The Company's Investigation Process

Where a complaint or report qualifies for protection under this policy, including the

additional procedures set forth in Appendix I hereto for reporting persons located in Australia, the Company has measures in place to ensure that the complaint or report is investigated as appropriate which includes the following (except where, in the opinion of the Chief Financial Officer and the Audit Committee, it would be inappropriate or unreasonable in the circumstances to do so):

- Investigations of complaints or reports will be conducted as soon as reasonably practicable and in a timely manner.
- All complaints and reports will be reviewed under the direction and oversight of the Audit Committee and the Chief Financial Officer or such other persons as the Audit Committee and the Chief Financial Officer determines to be appropriate.
- In the event the complaint or report is determined to be in respect of an Accounting Matter or Compliance Matter, the Audit Committee and/or the Chief Financial Officer may, where it considers appropriate, appoint a third-party investigator to conduct an investigation.
- Confidentiality will be maintained to the fullest extent possible and in accordance with the confidentiality obligations referred to in this policy.
- The Company recognizes that individuals against whom a report is made must also be supported during the handling and investigation of the report and will take reasonable steps to treat the person who is the subject of a report fairly, particularly during the assessment and investigation process. An employee who is the subject of a complaint or report will be advised about the subject matter of such complaint or report as and when required by principles of natural justice and procedural fairness and prior to any actions being taken.
- Wherever possible, and assuming that the identity of the reporting person is known, or where the reporting person has provided a means of contacting them, the reporting person will be kept informed of the progress and outcomes of the investigation including expected timeframes of the investigation subject to privacy and confidentiality considerations. Timeframes and frequency of updates may vary depending on the nature of the disclosure. Reporting persons can raise concerns about management of a complaint or report to any persons set out in "Reporting Procedures for Complaints and Reports."

Anonymous reports may have significant limitations that inhibit a proper and appropriate inquiry or investigation. These limitations may include the inability to provide feedback on the outcome and/or to gather additional particulars to assist the inquiry/investigation.

Investigation Findings

The investigation may conclude with a report from the Chief Financial Officer or Audit Committee or a third-party investigator. The report will include findings on the allegations coming out of a disclosure and a summary of the evidence on which the findings are based.

To the extent permitted under applicable laws, the Chief Financial Officer or Audit Committee may inform a reporting person and/or a person against whom allegations have been made by the reporting person of the findings. This will only be possible where contact details of a reporting person, or another method of contacting the reporting person (for example through the

third party service provider Hotline) has been provided to the Company.

Any written report will remain the property of the Company and will not be shared with the reporting person or any person against whom allegations coming out of a disclosure have been made.

Reporting and Retention of Complaints and Investigations

The Chief Executive Officer or Chief Financial Officer will maintain a log of all complaints, tracking their receipt, investigation and resolution and shall prepare a periodic summary report thereof for the Audit Committee. Additionally, the Chief Financial Officer and the Chairman of the Audit Committee will receive a copy of each complaint received.

Policy Compliance

Any breach of this policy by an officer, employee or contractor will be taken seriously by the Company, and may be the subject of a separate investigation and/or disciplinary action. For confidential advice or information regarding this policy, without making a disclosure, please contact the Company's Chief Financial Officer.

Amendments

The Audit Committee or the Board of Directors of the Company may amend these procedures at any time, consistent with requirements of applicable laws, rules and regulations.

APPENDIX I

AUSTRALIAN WHISTLEBLOWER POLICY

Civeo Pty Ltd (ACN 003 657 510), on its own behalf and on behalf of its subsidiaries (collectively, "Civeo Australia"), has adopted these procedures in compliance with the whistleblower protections under the *Corporations Act 2001* (Cth) ("Corporations Act").

This policy is in addition to, and not substitution for, Civeo Corporation's Policy for Employee Complaint and Reporting Procedures for Accounting and Compliance Matters ("Global Complaint Policy"); however, to the extent of any conflict between this policy and the Global Complaint Policy, this policy will take precedence with respect to matters covered by the Corporations Act as it has been designed to meet specific Australian legislative requirements. For the avoidance of doubt, this policy does not apply to personnel outside of Australia, who should continue to refer to the Global Complaint Policy.

Eligible Whistleblowers

"Whistleblower" means a person who is or has been a person to whom this policy applies and who makes a Disclosure (as defined below) under this policy. For purposes of this policy, eligible Whistleblowers include Civeo Australia's current or former:

- officers or employees;
- suppliers of services or goods (whether paid or unpaid) including their current and former employees (e.g. contractors, consultants, service providers and business partners);
- associates; or
- current or former relatives or dependents of the above-mentioned individuals, which includes a spouse or former spouse.

Eligible Disclosures

"Disclosure(s)" means when a Whistleblower notifies a person or organisation identified in this policy of a Disclosable Matter. A "Disclosable Matter" is the information the Whistleblower has reasonable grounds on which to suspect misconduct, or an improper state of affairs or circumstances in relation to Civeo Australia or its related body corporates, including conduct by an officer or employee of Civeo Australia. "Misconduct" is defined in the Corporations Act to include "fraud, negligence, default, breach of trust and breach of duty."

Disclosable Matters include conduct that may not involve a contravention of a particular law. Examples of Disclosable Matters include:

- illegal conduct, such as theft, dealing in, or use of illicit drugs, violence or threatened violence (also see Civeo Australia's Policy on Bullying and Harassment Policy (Corp HR POL 01) and Civeo Australia's Workplace Threats and Violence Policy (Corp HR POL 25);
- fraud, money laundering or misappropriation of funds;

- breach of Civeo Corporation's Anti-Bribery Policy (e.g. offering or accepting a bribe);
- financial irregularities;
- failure to comply with, or breach of, legal or regulatory requirements;
- engaging in or threatening to engage in detrimental conduct against a person who has made a Disclosure or is believed or suspected to have made, or be planning to make, a Disclosure;
- unsafe work practices or serious breaches of Health Safety Quality and Environment Policy (CORP HSQE POL 01); and
- breach of Civeo Australia's code of conduct (CORP LGL POL 06).

What is not a Disclosable Matter

Personal work-related grievances

Personal work-related grievances are grievances about any matter in relation to the Whistleblower's employment, or former employment, having (or tending to have) implications for the Whistleblower personally. People who raise personal work-related grievances will generally not qualify for protection under this policy.

Personal work-related grievances should be reported and dealt with in accordance with the following Civeo Australia policies:

- Internal Grievance Policy (Corp HR POL 07)
- Bullying and Harassment Policy (Corp HR POL 01)
- Civeo Australia's Workplace Threats and Violence Policy (Corp HR POL 25)

Disclosures about solely personal work-related grievances are not covered by the Corporations Act. However, a personal work-related grievance may still qualify for protection if it:

- concerns Whistleblower victimisation (causing or threatening to cause detriment);
- has significant implications for Civeo Australia, or another regulated entity, that do not relate to the discloser;
- concerns conduct, or alleged conduct regarding a Disclosable Matter;
- is disclosed to a legal practitioner for purposes of obtaining legal advice about the operation of the whistleblower laws.

Other matters not protected

While a Disclosure can still qualify for protection even if found to be incorrect, deliberate false reporting by the Whistleblower (i.e. a report that the Whistleblower knows to be untrue) is not permitted under this policy.

Disclosures that are not about Disclosable Matters do not qualify for protection under the Corporations Act (or the Taxation Administration Act 1953 ("TAA"), where relevant); however, such disclosures may be protected under other legislation, e.g. the Fair Work Act

2009.

How to Make a Disclosure

Whistleblowers may make Disclosures anonymously or otherwise using any of the methods described in the Global Complaint Policy under "Reporting Procedures for Complaints and Reports."

Although Whistleblowers are encouraged to report Disclosable Matters in accordance with one of the three methods outlined in the Global Complaint Policy in order to address wrongdoing as early as possible and enable an efficient investigation, the Corporations Act also allows for Disclosures regarding Disclosable Matters to be made to:

- an officer (which includes but is not limited to directors and company secretaries) or senior manager (as such terms are defined in the Corporation Act) of Civeo Australia or Civeo Australia's related bodies corporate;
- an auditor, or a member of an audit team conducting an audit, of Civeo Australia or Civeo Australia's related bodies corporate. Civeo Australia's current auditor is Ernst and Young, 200 George Street, Sydney NSW 2000, http://www.ey.com;
- the Commissioner of Taxation (in relation to tax affairs);
- the Australian Securities and Investments Commission ("ASIC");
- the Australian Prudential Regulatory Authority ("APRA");
- any another Commonwealth body prescribed by regulation;
- a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the operation of the whistleblower provisions under the Corporations Act and the TAA are protected (even in the event that such a Disclosure is found by the legal practitioner not to relate to a Disclosable Matter);
- a journalist or parliamentarian under certain limited circumstances as prescribed by the Corporations Act – see s 1317AAD(1) and (2) on 'public interest disclosure and emergency disclosure' under the Corporations Act.

Confidentiality and anonymity

Whistleblowers have a right to make Disclosures anonymously (and still be protected under the Corporations Act). Where a Disclosure is made using an email address or another method mentioned above where the Whistleblower's identity can be determined, and the Whistleblower does not identify themselves in the email for example, it will be treated as an anonymous disclosure.

Civeo Australia will keep a Whistleblower's identity confidential unless the Whistleblower has given consent to Civeo Australia to make a Disclosure.

However, Civeo Australia may disclose the identity of a Whistleblower, or information that is likely to lead to the identification of the Whistleblower, without their consent if the disclosure is made:

- to ASIC, APRA or a member of the Australian Federal Police;
- a legal practitioner for the purpose of obtaining legal advice or legal representation in relation to the whistleblower provisions under the Corporations Act and the TAA; or
- to the Commissioner of Taxation (if the Disclosure concerns Civeo Australia's tax affairs).

Civeo Australia can disclose the information contained in a Disclosure with or without the Whistleblower's consent if:

- the information does not include the Whistleblower's identity;
- Civeo Australia has taken all reasonable steps to reduce the risk that the Whistleblower will be identified from the information; and
- it is reasonably necessary for investigating the issues raised in the Disclosure.

Protection from detriments or threats

An officer or senior manager of Civeo Australia or Civeo Australia's related body corporates must not disclose or produce to a court or tribunal any information or documents which discloses the identity of a Whistleblower (or information likely to lead their identity becoming known) without seeking advice from Civeo Australia's Legal team.

Other than as provided for in this policy, it is illegal for a person to identify a Whistleblower, or to disclose information that is likely to lead to identification of the Whistleblower. If a Whistleblower suspects that their identity has been disclosed without their consent (other than in accordance with the exemption described above under "Confidentiality and anonymity") or has suffered any detriment (as referred to in the Global Complaint Policy under "Protections for Reporting Persons"), the Whistleblower may notify Civeo Australia using any of the avenues described in this policy. Civeo Australia will take all reasonable steps to protect a Whistleblower from conduct causing detriment and will take action it considers appropriate where such conduct is identified.

Protections from legal actions and contractual rights

A Whistleblower also has the right to the following legal protections:

- immunity from civil, criminal or administrative liability (including disciplinary action) other than for conduct of the Whistleblower that is revealed by the disclosure) (also available under the TAA);
- inadmissibility of information received from a disclosure into evidence against the Whistleblower in criminal proceedings or in proceedings for the imposition of a penalty (other than in some circumstances); and
- no contractual or other remedies/rights may be enforced/ exercised against the Whistleblower on the basis of the disclosure.

Remedies available to Whistleblowers

A Whistleblower (or any other employee or person) can seek compensation and other remedies through the courts (and are encouraged to seek independent legal advice) if:

- they suffer loss, damage or injury because of a disclosure; and
- Civeo Australia failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

Protections under the TAA

Whilst some reference is made in this policy to the TAA, for further information about protections available to Whistleblowers under the TAA, Whistleblowers should refer to the webpage of the Australian Taxation Office (ATO):
https://www.ato.gov.au/general/gen/whistleblowers/

Policy Compliance

Any breach of this policy by an officer, employee or contractor will be taken seriously by Civeo Australia, and may be the subject of a separate investigation and/or disciplinary action. A breach of this policy may also amount to a civil or criminal contravention under the Australian whistleblower laws, giving rise to significant penalties.

Whistleblowers are encouraged to seek independent legal advice if they require further information about the whistleblower protections under the Corporations Act and the TAA.