## Form **8937**(December 2011) Department of the Treasury Internal Revenue Service

## Report of Organizational Actions Affecting Basis of Securities

► See separate instructions.

OMB No. 1545-2224

Part I Reporting I	ssuer				
1 Issuer's name		2 Issuer's employer identification number (EIN)			
Ensco plc  3 Name of contact for add	likional information	4 Talamban	a Na of contact	98-0635229	
3 Name of contact for add	ntional information	4 Telephone No. of contact		5 Email address of contact	
Roger McCartney		713-789-1400	tax@enscopic.com		
6 Number and street (or P	.O. box if mail is no	7 City, town, or post office, state, and Zip code of contact			
6 Chesterfield Gardens, 3rd F	loor	London England W1J5BQ			
8 Date of action		9 Class	sification and description		
		*			
TBD	44 Ondalasashaa	Stock Ac		(A)	
10 CUSIP number	11 Serial number	(S)	12 Ticker symbol	13 Account number(s)	
29358QAA7	202590 A 47		ESV	Not Applicable	
	Not Applional Action Atta			Not Applicable see back of form for additional questions.	
				ate against which shareholders' ownership is measured for	
			C, a subsidiary of Ensco Hold		
				l income tax purposes. At the effective time of the merger	
and without any action on the	e part of the shareho	lders, each sha	re of AOI common stock the	n issued and outstanding (other than treasury shares)	
were cancelled and automatic	cally converted into a	and became the	e right to receive 1.6 ordinary	shares of Ensco plc ("ESV").	
15 Describe the quantitat	ive effect of the ora	anizational act	ion on the basis of the secu	rity in the hands of a U.S. taxpayer as an adjustment per	
				take a fair market value in the ESV ordinary	
				reated as having received shares of ESV as a dividend	
				re urged to consult their own tax advisors regarding	
their respective basis consequ					
16 Describe the calculation	on of the change in h	again and the	data that aupports the calcu	lation, such as the market values of securities and the	
				ange hands between a willing buyer and a willing seller,	
				e of the facts. U.S. federal income tax law does not	
specifically prescribe now for	mer AOI shareholde	ers snouid dete	rmine the lair market value o	of the ESV ordinary shares received in the merger.	
One possible method of deter	mining the fair mark	et value of one	ESV ordinary share is to us	e the average of the high and low trading prices on the date	
of the shareholder vote on Oc			LES / Ordinary share is to us	e the average of the high and fow trading prices on the date	
or the shareholder rote on Oc	TOOL COM, MULT, WILL	11 11 11 11 11 11 11 11 11 11 11 11 11			
Other methods for determini	ng the fair market va	lue of ESV or	dinary shares are possible. F	ormer AOI shareholders are not bound by the approach	
described above and may, in				are not sound at the approach	

Part I		Organizational Action (c	ontinued)				
<b>17</b> Lis	st the	applicable Internal Revenue Co	de section(s) and subsection(s	s) upon which the tax tre	eatment i	is based ▶	Sections 1001 and 1012;
		)(1); Section 302(a), or Sections 30		s) apoil willon the tax tre	atmont	is basea P	Sections 1001 and 1012;
Section .	304(a	(1), Section 302(a), or Sections 30	32(d) and 301(c)(1).				
					-		
8							
17							
18 Ca	ın anı	y resulting loss be recognized?	Loss generally may be reco	gnized in the merger, sub	iect to th	e discussion	ns of Section 304 below
						14	
		any other information necessar					
	200	OI shareholders in the merger may					
		holder to be treated as a dividend					
		as a result of the merger and sho		The state of the s		A CONTRACTOR OF THE PARTY OF TH	
		iding on their facts and circumsta					
	W-4-1	oxy statement filed by ESV and A	2-0000 NO. 100		), noting	especially t	he discussion under the
heading	"Mat	teral United States Federal Incom	e Tax Consequences of the Mer	ger".			
		ion provided herein is being provi	The Committee of the Co	Service of the servic	11 25 17 17250		
	1000	nary regarding the application of o					
		ontained herein is illustrative and				100 St. 100 St	
		ly to particular categories of share					
		consult their own tax advisors rega					icability and
effect of	all U.	S. federal, state, local and foreign	tax laws. We urge all former	AOI shareholders to read	the join	t proxy.	
	Undo	or popultion of porium. I deploy that	I have evenined this return inclu	diaa aaaamaanilaa aabadii			
		er penalties of perjury, I declare that f, it is true, correct, and complete. De					
Sign							
Here	Ciana	ature >	100 -	,	Data b	5-1	PLTOBER 2017
	Signa	ature			Date	- 0	12)0861 2011
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<u> </u>	riiiit	your name ► David A. Armour Print/Type preparer's name	Preparer's signature		Title ► ¹ Date	Vice Preside	PTIN
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Prepa		Firm's name ▶					Firm's EIN ▶
Use O	nıy	Firm's address >					Phone no.
Send For	rm 89	937 (including accompanying sta	itements) to: Department of th	e Treasury, Internal Rev	enue Se		