

Report of Organizational Actions Affecting Basis of Securities

OMB No. 1545-0123

► See separate instructions.

Part I Reporting Issuer

1 Issuer's name Rowan Companies plc		2 Issuer's employer identification number (EIN) 98-1023315	
3 Name of contact for additional information Roger McCartney	4 Telephone No. of contact 713-621-7800	5 Email address of contact tax@enscorowan.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact Cannon Place, 78 Cannon Street		7 City, town, or post office, state, and ZIP code of contact London England EC4N6AF	
8 Date of action April 11th, 2019		9 Classification and description Class A Common Stock - Stock Split	
10 CUSIP number G7665A101	11 Serial number(s)	12 Ticker symbol RDC	13 Account number(s)

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ► **On April 11th, 2019 all of the issued ordinary shares of Rowan Companies plc ("Rowan") were acquired by Ensco plc ("Ensco") in exchange for Ensco ordinary shares, in a transaction (the "Exchange") intended to qualify as a reorganization for United States federal income tax purposes pursuant to Section 368(a) of the Internal Revenue Code of 1986, as amended.**

The Rowan shareholders received 2.7 Ensco ordinary shares for each of their Rowan ordinary shares, except that no fractional shares were issued and the Rowan shareholders received cash in lieu of a fractional share.

Immediately after the Exchange, all Ensco ordinary shares (including those issued to Rowan shareholders in the exchange) were exchanged in a reverse stock split (the "Reverse Stock Split") in which one Ensco ordinary share was issued for each four Ensco ordinary shares outstanding immediately prior to the split. The reverse stock split is reported on an IRS Form 8937 filed by Ensco which contains additional information about the tax effects of the reverse stock split.

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ► **For a Rowan shareholder, the Ensco ordinary shares received in the Exchange (including any fractional share deemed received and exchanged for cash) will have the same aggregate tax basis as the shareholder's aggregate tax basis in the Rowan shares exchanged. If a Rowan shareholder acquired Rowan ordinary shares at different times or at different prices, the basis of each Rowan ordinary share shall be allocated to the Ensco ordinary shares received in the Exchange in proportion to the fair market value of the Ensco ordinary shares received.**

As reported in the IRS Form 8937 filed by Ensco with respect to the Reverse Stock Split, a shareholder's aggregate tax basis in the post-Reverse Stock Split Ensco ordinary shares received in the Reverse Stock Split (including any fractional share deemed received and exchanged for cash) will be the same as such shareholder's aggregate tax basis of the pre-Reverse Stock Split ordinary shares of Ensco received in the Exchange and then exchanged in the Reverse Stock Split.

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ► **There is no change in basis, other than that the basis allocated to a fractional share deemed received and sold will no longer be included in the shareholder's tax basis in its Ensco ordinary shares.**

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ►

IRC Section 368(a) – Definitions relating to corporate reorganizations

IRC Section 354(a) - Exchanges of stock and securities in certain reorganizations

IRC Section 356 - Receipt of additional consideration

IRC Section 358 - Basis to distributees

IRC Section 1001 - Determination of amount of and recognition of gain or loss

18 Can any resulting loss be recognized? ► n general, a shareholder who receives cash payment in lieu of a fractional share will recognize capital gain or loss equal to the difference between the amount of cash received in lieu of the fractional share and the portion of the holder's tax basis of the pre-reverse stock split shares that is allocable to the fractional share. Such gain or loss generally will be long-term capital gain or loss if the shareholder's holding period in its pre-reverse stock split shares is more than one year as of the reverse stock split date. The deductibility of net capital losses by individuals and corporations is subject to limitations.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ►

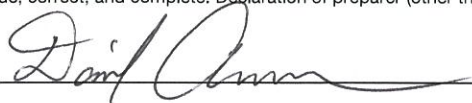
The stock basis adjustment and any gain or loss will be taken into account in the tax year of the shareholder during which the Exchange occurred (e.g., 2019 for calendar year taxpayers).

The information provided herein is being provided pursuant to the requirements of Section 6045B of the Internal Revenue Code and includes a general summary regarding the application of certain U.S. federal income tax laws and regulations related to the effects of the merger. The information contained herein is illustrative and does not constitute tax advice and does not purport to be complete or to describe the consequences that may apply to particular categories of shareholders. Neither Ensco or Rowan provides tax advice to its shareholders. All former Rowan shareholders are urged to consult their own tax advisors regarding the particular consequences of the merger to them including the applicability and effect of all U.S. federal, state, local and foreign tax laws.

Sign Here

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Signature ►



Date ►

Print your name ► **David A. Armour**

Title ► **Vice President - Tax**

Paid Preparer Use Only

Print/Type preparer's name

Preparer's signature

Date

Check ☐ if self-employed

PTIN

Firm's name ►

Firm's EIN ►

Firm's address ►

Phone no.