

Form 5500 Department of the Treasury Internal Revenue Service Department of Labor Employee Benefits Security Administration Pension Benefit Guaranty Corporation	Annual Return/Report of Employee Benefit Plan This form is required to be filed for employee benefit plans under sections 104 and 4065 of the Employee Retirement Income Security Act of 1974 (ERISA) and sections 6047(e), 6057(b), and 6058(a) of the Internal Revenue Code (the Code). <p style="text-align: center;">▶ Complete all entries in accordance with the instructions to the Form 5500.</p>	OMB Nos. 1210-0110 1210-0089 <div style="text-align: center; font-size: 1.5em; font-weight: bold;">2014</div> This Form is Open to Public Inspection
---	---	--

Part I	Annual Report Identification Information
For calendar plan year 2014 or fiscal plan year beginning <u>01/01/2014</u> and ending <u>12/31/2014</u>	
A This return/report is for:	☐ a multiemployer plan; ☐ a multiple-employer plan (Filers checking this box must attach a list of participating employer information in accordance with the form instructions); or ☒ a single-employer plan; ☐ a DFE (specify) _____
B This return/report is:	☐ the first return/report; ☐ the final return/report; ☐ an amended return/report; ☐ a short plan year return/report (less than 12 months).
C If the plan is a collectively-bargained plan, check here.	☐
D Check box if filing under:	☒ Form 5558; ☐ automatic extension; ☐ the DFVC program; ☐ special extension (enter description)

Part II	Basic Plan Information —enter all requested information												
1a Name of plan <u>THE ROWAN PENSION PLAN</u> 2a Plan sponsor's name and address; include room or suite number (employer, if for a single-employer plan) <u>ROWAN COMPANIES, INC.</u> <u>2800 POST OAK BLVD., SUITE 5450</u> <u>HOUSTON, TX 77056</u>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 80%;">1b Three-digit plan number (PN) ▶</td> <td style="width: 20%; text-align: center;"><u>001</u></td> </tr> <tr> <td colspan="2">1c Effective date of plan <u>01/01/1952</u></td> </tr> <tr> <td colspan="2">2b Employer Identification Number (EIN) <u>75-0759420</u></td> </tr> <tr> <td colspan="2">2c Plan Sponsor's telephone number <u>713-621-7800</u></td> </tr> <tr> <td colspan="2">2d Business code (see instructions) <u>211110</u></td> </tr> <tr> <td colspan="2" style="background-color: #cccccc; height: 30px;"></td> </tr> </table>	1b Three-digit plan number (PN) ▶	<u>001</u>	1c Effective date of plan <u>01/01/1952</u>		2b Employer Identification Number (EIN) <u>75-0759420</u>		2c Plan Sponsor's telephone number <u>713-621-7800</u>		2d Business code (see instructions) <u>211110</u>			
1b Three-digit plan number (PN) ▶	<u>001</u>												
1c Effective date of plan <u>01/01/1952</u>													
2b Employer Identification Number (EIN) <u>75-0759420</u>													
2c Plan Sponsor's telephone number <u>713-621-7800</u>													
2d Business code (see instructions) <u>211110</u>													

Caution: A penalty for the late or incomplete filing of this return/report will be assessed unless reasonable cause is established.

Under penalties of perjury and other penalties set forth in the instructions, I declare that I have examined this return/report, including accompanying schedules, statements and attachments, as well as the electronic version of this return/report, and to the best of my knowledge and belief, it is true, correct, and complete.

SIGN HERE	Filed with authorized/valid electronic signature.	10/14/2015	GARY L. MARSH
	Signature of plan administrator	Date	Enter name of individual signing as plan administrator
SIGN HERE			
	Signature of employer/plan sponsor	Date	Enter name of individual signing as employer or plan sponsor
SIGN HERE			
	Signature of DFE	Date	Enter name of individual signing as DFE
Preparer's name (including firm name, if applicable) and address (include room or suite number) (optional)			Preparer's telephone number (optional)

3a Plan administrator's name and address ☐ Same as Plan Sponsor ADMINISTRATOR, ROWAN PENSION PLAN 2800 POST OAK BLVD STE 5450 HOUSTON, TX 77056	3b Administrator's EIN 74-1981236
	3c Administrator's telephone number 713-621-7800
4 If the name and/or EIN of the plan sponsor has changed since the last return/report filed for this plan, enter the name, EIN and the plan number from the last return/report: a Sponsor's name	4b EIN 4c PN
5 Total number of participants at the beginning of the plan year	5 5424
6 Number of participants as of the end of the plan year unless otherwise stated (welfare plans complete only lines 6a(1) , 6a(2) , 6b , 6c , and 6d).	
a(1) Total number of active participants at the beginning of the plan year	6a(1) 1393
a(2) Total number of active participants at the end of the plan year	6a(2) 1438
b Retired or separated participants receiving benefits	6b 1755
c Other retired or separated participants entitled to future benefits.....	6c 1852
d Subtotal. Add lines 6a(2) , 6b , and 6c	6d 5045
e Deceased participants whose beneficiaries are receiving or are entitled to receive benefits.	6e 282
f Total. Add lines 6d and 6e	6f 5327
g Number of participants with account balances as of the end of the plan year (only defined contribution plans complete this item)	6g
h Number of participants that terminated employment during the plan year with accrued benefits that were less than 100% vested.....	6h 18
7 Enter the total number of employers obligated to contribute to the plan (only multiemployer plans complete this item).....	7
8a If the plan provides pension benefits, enter the applicable pension feature codes from the List of Plan Characteristics Codes in the instructions: 1A 1C 3H	
b If the plan provides welfare benefits, enter the applicable welfare feature codes from the List of Plan Characteristics Codes in the instructions:	
9a Plan funding arrangement (check all that apply) (1) ☐ Insurance (2) ☐ Code section 412(e)(3) insurance contracts (3) ☒ Trust (4) ☐ General assets of the sponsor	9b Plan benefit arrangement (check all that apply) (1) ☐ Insurance (2) ☐ Code section 412(e)(3) insurance contracts (3) ☒ Trust (4) ☐ General assets of the sponsor
10 Check all applicable boxes in 10a and 10b to indicate which schedules are attached, and, where indicated, enter the number attached. (See instructions)	
a Pension Schedules (1) ☒ R (Retirement Plan Information) (2) ☐ MB (Multiemployer Defined Benefit Plan and Certain Money Purchase Plan Actuarial Information) - signed by the plan actuary (3) ☒ SB (Single-Employer Defined Benefit Plan Actuarial Information) - signed by the plan actuary	b General Schedules (1) ☒ H (Financial Information) (2) ☐ I (Financial Information – Small Plan) (3) ☐ A (Insurance Information) (4) ☒ C (Service Provider Information) (5) ☒ D (DFE/Participating Plan Information) (6) ☐ G (Financial Transaction Schedules)

Part III**Form M-1 Compliance Information (to be completed by welfare benefit plans)**

11a If the plan provides welfare benefits, was the plan subject to the Form M-1 filing requirements during the plan year? (See instructions and 29 CFR 2520.101-2.) ☐ Yes ☐ No

If "Yes" is checked, complete lines 11b and 11c.

11b Is the plan currently in compliance with the Form M-1 filing requirements? (See instructions and 29 CFR 2520.101-2.) ☐ Yes ☐ No

11c Enter the Receipt Confirmation Code for the 2014 Form M-1 annual report. If the plan was not required to file the 2014 Form M-1 annual report, enter the Receipt Confirmation Code for the most recent Form M-1 that was required to be filed under the Form M-1 filing requirements. (Failure to enter a valid Receipt Confirmation Code will subject the Form 5500 filing to rejection as incomplete.)

Receipt Confirmation Code _____

<div>SCHEDULE SB (Form 5500) Department of the Treasury Internal Revenue Service Department of Labor Employee Benefits Security Administration Pension Benefit Guaranty Corporation</div>	<div>Single-Employer Defined Benefit Plan Actuarial Information</div> <div>This schedule is required to be filed under section 104 of the Employee Retirement Income Security Act of 1974 (ERISA) and section 6059 of the Internal Revenue Code (the Code).</div> <div>File as an attachment to Form 5500 or 5500-SF.</div>	<div>OMB No. 1210-0110</div> <div>2014</div> <div>This Form is Open to Public Inspection</div>
--	---	--

For calendar plan year 2014 or fiscal plan year beginning 01/01/2014 and ending 12/31/2014	
Round off amounts to nearest dollar.	
Caution: A penalty of \$1,000 will be assessed for late filing of this report unless reasonable cause is established.	
A Name of plan THE ROWAN PENSION PLAN	B Three-digit plan number (PN) 001
C Plan sponsor's name as shown on line 2a of Form 5500 or 5500-SF ROWAN COMPANIES, INC.	D Employer Identification Number (EIN) 75-0759420
E Type of plan: ☒ Single ☐ Multiple-A ☐ Multiple-B	F Prior year plan size: ☐ 100 or fewer ☐ 101-500 ☒ More than 500

Part I Basic Information			
1 Enter the valuation date: Month 01 Day 01 Year 2014			
2 Assets:			
a Market value	2a	591443381	
b Actuarial value	2b	559158859	
3 Funding target/participant count breakdown	(1) Number of participants	(2) Vested Funding Target	(3) Total Funding Target
a For retired participants and beneficiaries receiving payment	2022	303196437	303196437
b For terminated vested participants	2036	125709968	125709968
c For active participants	1393	125204253	126371907
d Total	5451	554110658	555278312
4 If the plan is in at-risk status, check the box and complete lines (a) and (b)			
a Funding target disregarding prescribed at-risk assumptions	4a		
b Funding target reflecting at-risk assumptions, but disregarding transition rule for plans that have been in at-risk status for fewer than five consecutive years and disregarding loading factor	4b		
5 Effective interest rate	5	6.54%	
6 Target normal cost	6	12746057	

Statement by Enrolled Actuary	
To the best of my knowledge, the information supplied in this schedule and accompanying schedules, statements and attachments, if any, is complete and accurate. Each prescribed assumption was applied in accordance with applicable law and regulations. In my opinion, each other assumption is reasonable (taking into account the experience of the plan and reasonable expectations) and such other assumptions, in combination, offer my best estimate of anticipated experience under the plan.	
SIGN HERE	
Signature of actuary	10/08/2015
KEVIN BILLS	Date
Type or print name of actuary	14-07029
MERCER	Most recent enrollment number
Firm name	713-276-2100
500 DALLAS STREET, SUITE 1400 HOUSTON, TX 77002-4800	Telephone number (including area code)
Address of the firm	

Part II Beginning of Year Carryover and Prefunding Balances		
	(a) Carryover balance	(b) Prefunding balance
7 Balance at beginning of prior year after applicable adjustments (line 13 from prior year)		18322575
8 Portion elected for use to offset prior year's funding requirement (line 35 from prior year)		18322575
9 Amount remaining (line 7 minus line 8)	0	0
10 Interest on line 9 using prior year's actual return of 14.88%	0	0
11 Prior year's excess contributions to be added to prefunding balance:		
a Present value of excess contributions (line 38a from prior year)		34401586
b(1) Interest on the excess, if any, of line 38a over line 38b from prior year Schedule SB, using prior year's effective interest rate of 6.74%		1083725
b(2) Interest on line 38b from prior year Schedule SB, using prior year's actual return		2726399
c Total available at beginning of current plan year to add to prefunding balance		38211710
d Portion of (c) to be added to prefunding balance		38211710
12 Other reductions in balances due to elections or deemed elections		0
13 Balance at beginning of current year (line 9 + line 10 + line 11d – line 12)	0	38211710

Part III Funding Percentages		
14 Funding target attainment percentage	14	93.81 %
15 Adjusted funding target attainment percentage	15	100.69 %
16 Prior year's funding percentage for purposes of determining whether carryover/prefunding balances may be used to reduce current year's funding requirement	16	92.08 %
17 If the current value of the assets of the plan is less than 70 percent of the funding target, enter such percentage	17	%

Part IV Contributions and Liquidity Shortfalls					
18 Contributions made to the plan for the plan year by employer(s) and employees:					
(a) Date (MM-DD-YYYY)	(b) Amount paid by employer(s)	(c) Amount paid by employees	(a) Date (MM-DD-YYYY)	(b) Amount paid by employer(s)	(c) Amount paid by employees
Totals ►			18(b)	0	18(c) 0

19 Discounted employer contributions – see instructions for small plan with a valuation date after the beginning of the year:		
a Contributions allocated toward unpaid minimum required contributions from prior years	19a	0
b Contributions made to avoid restrictions adjusted to valuation date	19b	0
c Contributions allocated toward minimum required contribution for current year adjusted to valuation date	19c	0
20 Quarterly contributions and liquidity shortfalls:		
a Did the plan have a "funding shortfall" for the prior year?		☒ Yes ☐ No
b If line 20a is "Yes," were required quarterly installments for the current year made in a timely manner?		☒ Yes ☐ No
c If line 20a is "Yes," see instructions and complete the following table as applicable:		
Liquidity shortfall as of end of quarter of this plan year		
(1) 1st	(2) 2nd	(3) 3rd
0	0	0
(4) 4th		
0		

Part V Assumptions Used to Determine Funding Target and Target Normal Cost

21 Discount rate:				
a Segment rates:	1st segment: 4.99 %	2nd segment: 6.32 %	3rd segment: 6.99 %	☐ N/A, full yield curve used
b Applicable month (enter code).....				21b 4
22 Weighted average retirement age				22 52
23 Mortality table(s) (see instructions) ☐ Prescribed - combined ☒ Prescribed - separate ☐ Substitute				

Part VI Miscellaneous Items

24 Has a change been made in the non-prescribed actuarial assumptions for the current plan year? If "Yes," see instructions regarding required attachment.	☒ Yes ☐ No
25 Has a method change been made for the current plan year? If "Yes," see instructions regarding required attachment.	☐ Yes ☒ No
26 Is the plan required to provide a Schedule of Active Participants? If "Yes," see instructions regarding required attachment.	☒ Yes ☐ No
27 If the plan is subject to alternative funding rules, enter applicable code and see instructions regarding attachment.....	27

Part VII Reconciliation of Unpaid Minimum Required Contributions For Prior Years

28 Unpaid minimum required contributions for all prior years	28	0
29 Discounted employer contributions allocated toward unpaid minimum required contributions from prior years (line 19a).....	29	0
30 Remaining amount of unpaid minimum required contributions (line 28 minus line 29)	30	0

Part VIII Minimum Required Contribution For Current Year

31 Target normal cost and excess assets (see instructions):			
a Target normal cost (line 6).....	31a	12746057	
b Excess assets, if applicable, but not greater than line 31a	31b	0	
32 Amortization installments:	Outstanding Balance	Installment	
a Net shortfall amortization installment.....	34331163	19916820	
b Waiver amortization installment		0	
33 If a waiver has been approved for this plan year, enter the date of the ruling letter granting the approval (Month _____ Day _____ Year _____) and the waived amount	33	0	
34 Total funding requirement before reflecting carryover/prefunding balances (lines 31a - 31b + 32a + 32b - 33)...	34	32662877	
	Carryover balance	Prefunding balance	Total balance
35 Balances elected for use to offset funding requirement.....	0	32662877	32662877
36 Additional cash requirement (line 34 minus line 35).....	36	0	
37 Contributions allocated toward minimum required contribution for current year adjusted to valuation date (line 19c).....	37	0	
38 Present value of excess contributions for current year (see instructions)			
a Total (excess, if any, of line 37 over line 36)	38a	0	
b Portion included in line 38a attributable to use of prefunding and funding standard carryover balances	38b	0	
39 Unpaid minimum required contribution for current year (excess, if any, of line 36 over line 37)	39	0	
40 Unpaid minimum required contributions for all years	40	0	

Part IX Pension Funding Relief Under Pension Relief Act of 2010 (See Instructions)

41 If an election was made to use PRA 2010 funding relief for this plan:			
a Schedule elected	☐ 2 plus 7 years ☐ 15 years		
b Eligible plan year(s) for which the election in line 41a was made	☐ 2008 ☐ 2009 ☐ 2010 ☐ 2011		
42 Amount of acceleration adjustment	42		
43 Excess installment acceleration amount to be carried over to future plan years	43		

SCHEDULE C (Form 5500) Department of the Treasury Internal Revenue Service Department of Labor Employee Benefits Security Administration Pension Benefit Guaranty Corporation	Service Provider Information This schedule is required to be filed under section 104 of the Employee Retirement Income Security Act of 1974 (ERISA). ▶ File as an attachment to Form 5500.	OMB No. 1210-0110
		2014
		This Form is Open to Public Inspection.

For calendar plan year 2014 or fiscal plan year beginning 01/01/2014 and ending 12/31/2014		
A Name of plan THE ROWAN PENSION PLAN	B Three-digit plan number (PN) ▶	001
C Plan sponsor's name as shown on line 2a of Form 5500 ROWAN COMPANIES, INC.	D Employer Identification Number (EIN) 75-0759420	

Part I	Service Provider Information (see instructions)
---------------	--

You must complete this Part, in accordance with the instructions, to report the information required for **each person** who received, directly or indirectly, \$5,000 or more in total compensation (i.e., money or anything else of monetary value) in connection with services rendered to the plan or the person's position with the plan during the plan year. If a person received **only** eligible indirect compensation for which the plan received the required disclosures, you are required to answer line 1 but are not required to include that person when completing the remainder of this Part.

1 Information on Persons Receiving Only Eligible Indirect Compensation

- a** Check "Yes" or "No" to indicate whether you are excluding a person from the remainder of this Part because they received only eligible indirect compensation for which the plan received the required disclosures (see instructions for definitions and conditions)..... ☐ Yes ☒ No
- b** If you answered line 1a "Yes," enter the name and EIN or address of each person providing the required disclosures for the service providers who received only eligible indirect compensation. Complete as many entries as needed (see instructions).

(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation

(b) Enter name and EIN or address of person who provided you disclosure on eligible indirect compensation
--

(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation

(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation

(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation

(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation

(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation

(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation

(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation

(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation

(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation

(b) Enter name and EIN or address of person who provided you disclosures on eligible indirect compensation

2. Information on Other Service Providers Receiving Direct or Indirect Compensation. Except for those persons for whom you answered "Yes" to line 1a above, complete as many entries as needed to list each person receiving, directly or indirectly, \$5,000 or more in total compensation (i.e., money or anything else of value) in connection with services rendered to the plan or their position with the plan during the plan year. (See instructions).

(a) Enter name and EIN or address (see instructions)

MERCER

13-2834414

(b) Service Code(s)	(c) Relationship to employer, employee organization, or person known to be a party-in-interest	(d) Enter direct compensation paid by the plan. If none, enter -0-.	(e) Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	(f) Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	(g) Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	(h) Did the service provider give you a formula instead of an amount or estimated amount?
11 28	NONE	298736	Yes ☐ No ☒	Yes ☐ No ☐		Yes ☐ No ☐

(a) Enter name and EIN or address (see instructions)

JP MORGAN CHASE

13-4994650

(b) Service Code(s)	(c) Relationship to employer, employee organization, or person known to be a party-in-interest	(d) Enter direct compensation paid by the plan. If none, enter -0-.	(e) Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	(f) Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	(g) Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	(h) Did the service provider give you a formula instead of an amount or estimated amount?
21	NONE	194858	Yes ☒ No ☐	Yes ☒ No ☐	0	Yes ☒ No ☐

(a) Enter name and EIN or address (see instructions)

STATE STREET

04-1867445

(b) Service Code(s)	(c) Relationship to employer, employee organization, or person known to be a party-in-interest	(d) Enter direct compensation paid by the plan. If none, enter -0-.	(e) Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	(f) Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	(g) Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	(h) Did the service provider give you a formula instead of an amount or estimated amount?
28	NONE	188407	Yes ☒ No ☐	Yes ☒ No ☐	0	Yes ☐ No ☒

2. Information on Other Service Providers Receiving Direct or Indirect Compensation. Except for those persons for whom you answered "Yes" to line 1a above, complete as many entries as needed to list each person receiving, directly or indirectly, \$5,000 or more in total compensation (i.e., money or anything else of value) in connection with services rendered to the plan or their position with the plan during the plan year. (See instructions).

(a) Enter name and EIN or address (see instructions)

UBS

06-1452020

(b) Service Code(s)	(c) Relationship to employer, employee organization, or person known to be a party-in-interest	(d) Enter direct compensation paid by the plan. If none, enter -0-.	(e) Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	(f) Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	(g) Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	(h) Did the service provider give you a formula instead of an amount or estimated amount?
28	NONE	139520	Yes ☐ No ☒	Yes ☐ No ☐		Yes ☐ No ☐

(a) Enter name and EIN or address (see instructions)

CENTERSQUARE INVESMENT MANAGEMENT I

23-2817243

(b) Service Code(s)	(c) Relationship to employer, employee organization, or person known to be a party-in-interest	(d) Enter direct compensation paid by the plan. If none, enter -0-.	(e) Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	(f) Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	(g) Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	(h) Did the service provider give you a formula instead of an amount or estimated amount?
28	NONE	126208	Yes ☒ No ☐	Yes ☐ No ☒	0	Yes ☐ No ☒

(a) Enter name and EIN or address (see instructions)

FORT WASHINGTON INVESTMENT ADVISORS

31-1301863

(b) Service Code(s)	(c) Relationship to employer, employee organization, or person known to be a party-in-interest	(d) Enter direct compensation paid by the plan. If none, enter -0-.	(e) Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	(f) Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	(g) Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	(h) Did the service provider give you a formula instead of an amount or estimated amount?
28	NONE	34346	Yes ☐ No ☒	Yes ☐ No ☐		Yes ☐ No ☐

2. Information on Other Service Providers Receiving Direct or Indirect Compensation. Except for those persons for whom you answered "Yes" to line 1a above, complete as many entries as needed to list each person receiving, directly or indirectly, \$5,000 or more in total compensation (i.e., money or anything else of value) in connection with services rendered to the plan or their position with the plan during the plan year. (See instructions).

(a) Enter name and EIN or address (see instructions)

MCCONNELL & JONES LLP

76-0488832

(b) Service Code(s)	(c) Relationship to employer, employee organization, or person known to be a party-in-interest	(d) Enter direct compensation paid by the plan. If none, enter -0-.	(e) Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	(f) Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	(g) Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	(h) Did the service provider give you a formula instead of an amount or estimated amount?
10	NONE	14540	Yes ☐ No ☒	Yes ☐ No ☐		Yes ☐ No ☐

(a) Enter name and EIN or address (see instructions)

(b) Service Code(s)	(c) Relationship to employer, employee organization, or person known to be a party-in-interest	(d) Enter direct compensation paid by the plan. If none, enter -0-.	(e) Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	(f) Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	(g) Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	(h) Did the service provider give you a formula instead of an amount or estimated amount?
			Yes ☐ No ☐	Yes ☐ No ☐		Yes ☐ No ☐

(a) Enter name and EIN or address (see instructions)

(b) Service Code(s)	(c) Relationship to employer, employee organization, or person known to be a party-in-interest	(d) Enter direct compensation paid by the plan. If none, enter -0-.	(e) Did service provider receive indirect compensation? (sources other than plan or plan sponsor)	(f) Did indirect compensation include eligible indirect compensation, for which the plan received the required disclosures?	(g) Enter total indirect compensation received by service provider excluding eligible indirect compensation for which you answered "Yes" to element (f). If none, enter -0-.	(h) Did the service provider give you a formula instead of an amount or estimated amount?
			Yes ☐ No ☐	Yes ☐ No ☐		Yes ☐ No ☐

Part I Service Provider Information (continued)

3 If you reported on line 2 receipt of indirect compensation, other than eligible indirect compensation, by a service provider, and the service provider is a fiduciary or provides contract administrator, consulting, custodial, investment advisory, investment management, broker, or recordkeeping services, answer the following questions for (a) each source from whom the service provider received \$1,000 or more in indirect compensation and (b) each source for whom the service provider gave you a formula used to determine the indirect compensation instead of an amount or estimated amount of the indirect compensation. Complete as many entries as needed to report the required information for each source.

(a) Enter service provider name as it appears on line 2	(b) Service Codes (see instructions)	(c) Enter amount of indirect compensation
JP MORGAN CHASE	21	0

(d) Enter name and EIN (address) of source of indirect compensation	(e) Describe the indirect compensation, including any formula used to determine the service provider's eligibility for or the amount of the indirect compensation.
JP MORGAN CHASE BANK 13-4994650	BORROWERS THAT USE JP MORGAN AS THEIR CLEARING BANK PAY JP MORGAN A NEGOTIATED FEE OF \$0.75-\$2.00 FOR EACH RECEIPT OR DELIVERY OF BORROWED SECURITIES

(a) Enter service provider name as it appears on line 2	(b) Service Codes (see instructions)	(c) Enter amount of indirect compensation
JP MORGAN CHASE	21	0

(d) Enter name and EIN (address) of source of indirect compensation	(e) Describe the indirect compensation, including any formula used to determine the service provider's eligibility for or the amount of the indirect compensation.
JP MORGAN CHASE 13-4994650	REPURCHASE AGREEMENT COUNTERPARTIES THAT USE JP MORGAN AS THEIR CLEARING BANK PAY JP MORGAN A NEGOTIATED FEE EITHER UP TO \$25 PER TRANSACTION OR A WEIGHTED AVERAGE ANNUAL FEE OF 0.36 BASIS POINTS ON THE SECURITIES HELD AS TR-PARTY AGENT.

(a) Enter service provider name as it appears on line 2	(b) Service Codes (see instructions)	(c) Enter amount of indirect compensation
JP MORGAN CHASE	21	0

(d) Enter name and EIN (address) of source of indirect compensation	(e) Describe the indirect compensation, including any formula used to determine the service provider's eligibility for or the amount of the indirect compensation.
JP MORGAN CHASE 13-4994650	BORROWERS THAT POST NON-CASH COLLATERAL AND USE JP MORGAN AS THEIR CLEARING BANK PAY JP MORGAN A NEGOTIATED FEE OF EITHER UP TO \$25 PER TRANSACTION OR A WEIGHTED AVERAGE ANNUAL FEE OF 0.36 BASIS POINTS ON THE NON-CASH COLLATERAL HELD AS TR-PARTY AGENT.

Part II Service Providers Who Fail or Refuse to Provide Information

4 Provide, to the extent possible, the following information for each service provider who failed or refused to provide the information necessary to complete this Schedule.

(a) Enter name and EIN or address of service provider (see instructions)	(b) Nature of Service Code(s)	(c) Describe the information that the service provider failed or refused to provide

Part III **Termination Information on Accountants and Enrolled Actuaries (see instructions)**
(complete as many entries as needed)

a Name:	b EIN:
c Position:	
d Address:	e Telephone:

Explanation:

a Name:	b EIN:
c Position:	
d Address:	e Telephone:

Explanation:

a Name:	b EIN:
c Position:	
d Address:	e Telephone:

Explanation:

a Name:	b EIN:
c Position:	
d Address:	e Telephone:

Explanation:

a Name:	b EIN:
c Position:	
d Address:	e Telephone:

Explanation:

SCHEDULE D (Form 5500) <small>Department of the Treasury Internal Revenue Service</small> <small>Department of Labor Employee Benefits Security Administration</small>	DFE/Participating Plan Information This schedule is required to be filed under section 104 of the Employee Retirement Income Security Act of 1974 (ERISA). ► File as an attachment to Form 5500.	OMB No. 1210-0110 <hr/> 2014 <hr/> This Form is Open to Public Inspection.
---	--	--

For calendar plan year 2014 or fiscal plan year beginning 01/01/2014 and ending 12/31/2014

A Name of plan <u>THE ROWAN PENSION PLAN</u>	B Three-digit plan number (PN) ►	<u>001</u>
C Plan or DFE sponsor's name as shown on line 2a of Form 5500 <u>ROWAN COMPANIES, INC.</u>	D Employer Identification Number (EIN) <u>75-0759420</u>	

Part I	Information on interests in MTIAs, CCTs, PSAs, and 103-12 IEs (to be completed by plans and DFEs) (Complete as many entries as needed to report all interests in DFEs)
---------------	--

a Name of MTIA, CCT, PSA, or 103-12 IE: <u>SSGA RUSSEL 2000 INDEX NL FUND</u>		
b Name of sponsor of entity listed in (a): <u>JP MORGAN</u>		
c EIN-PN <u>04-0025081-013</u>	d Entity code <u>C</u>	e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions) <u>38106325</u>
a Name of MTIA, CCT, PSA, or 103-12 IE: <u>SSGA MSCI ACWI EX USA NON-LENDING F</u>		
b Name of sponsor of entity listed in (a): <u>JP MORGAN</u>		
c EIN-PN <u>90-0337987-159</u>	d Entity code <u>C</u>	e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions) <u>135946656</u>
a Name of MTIA, CCT, PSA, or 103-12 IE: <u>SSGA S&P 500 FLAGSHIP NON-LENDING F</u>		
b Name of sponsor of entity listed in (a): <u>JP MORGAN</u>		
c EIN-PN <u>04-0025081-004</u>	d Entity code <u>C</u>	e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions) <u>159540695</u>
a Name of MTIA, CCT, PSA, or 103-12 IE: <u>SSGA U.S. AGGREAGATE BOND INDEX NON</u>		
b Name of sponsor of entity listed in (a): <u>JP MORGAN</u>		
c EIN-PN <u>04-0025081-070</u>	d Entity code <u>C</u>	e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions) <u>85412133</u>
a Name of MTIA, CCT, PSA, or 103-12 IE: <u>EB GLOBAL REAL ESTATE SECURITIES</u>		
b Name of sponsor of entity listed in (a): <u>THE BANK OF NEW YORK MELLON</u>		
c EIN-PN <u>25-6078093-183</u>	d Entity code <u>C</u>	e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions) <u>19069748</u>
a Name of MTIA, CCT, PSA, or 103-12 IE:		
b Name of sponsor of entity listed in (a):		
c EIN-PN	d Entity code	e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)
a Name of MTIA, CCT, PSA, or 103-12 IE:		
b Name of sponsor of entity listed in (a):		
c EIN-PN	d Entity code	e Dollar value of interest in MTIA, CCT, PSA, or 103-12 IE at end of year (see instructions)

a Name of MTIA, CCT, PSA, or 103-12 IE:**b** Name of sponsor of entity listed in (a):**c** EIN-PN**d** Entity
code**e** Dollar value of interest in MTIA, CCT, PSA, or
103-12 IE at end of year (see instructions)**a** Name of MTIA, CCT, PSA, or 103-12 IE:**b** Name of sponsor of entity listed in (a):**c** EIN-PN**d** Entity
code**e** Dollar value of interest in MTIA, CCT, PSA, or
103-12 IE at end of year (see instructions)**a** Name of MTIA, CCT, PSA, or 103-12 IE:**b** Name of sponsor of entity listed in (a):**c** EIN-PN**d** Entity
code**e** Dollar value of interest in MTIA, CCT, PSA, or
103-12 IE at end of year (see instructions)**a** Name of MTIA, CCT, PSA, or 103-12 IE:**b** Name of sponsor of entity listed in (a):**c** EIN-PN**d** Entity
code**e** Dollar value of interest in MTIA, CCT, PSA, or
103-12 IE at end of year (see instructions)**a** Name of MTIA, CCT, PSA, or 103-12 IE:**b** Name of sponsor of entity listed in (a):**c** EIN-PN**d** Entity
code**e** Dollar value of interest in MTIA, CCT, PSA, or
103-12 IE at end of year (see instructions)**a** Name of MTIA, CCT, PSA, or 103-12 IE:**b** Name of sponsor of entity listed in (a):**c** EIN-PN**d** Entity
code**e** Dollar value of interest in MTIA, CCT, PSA, or
103-12 IE at end of year (see instructions)**a** Name of MTIA, CCT, PSA, or 103-12 IE:**b** Name of sponsor of entity listed in (a):**c** EIN-PN**d** Entity
code**e** Dollar value of interest in MTIA, CCT, PSA, or
103-12 IE at end of year (see instructions)**a** Name of MTIA, CCT, PSA, or 103-12 IE:**b** Name of sponsor of entity listed in (a):**c** EIN-PN**d** Entity
code**e** Dollar value of interest in MTIA, CCT, PSA, or
103-12 IE at end of year (see instructions)**a** Name of MTIA, CCT, PSA, or 103-12 IE:**b** Name of sponsor of entity listed in (a):**c** EIN-PN**d** Entity
code**e** Dollar value of interest in MTIA, CCT, PSA, or
103-12 IE at end of year (see instructions)**a** Name of MTIA, CCT, PSA, or 103-12 IE:**b** Name of sponsor of entity listed in (a):**c** EIN-PN**d** Entity
code**e** Dollar value of interest in MTIA, CCT, PSA, or
103-12 IE at end of year (see instructions)

Part II Information on Participating Plans (to be completed by DFEs)

(Complete as many entries as needed to report all participating plans)

a Plan name**b** Name of
plan sponsor**c** EIN-PN**a** Plan name**b** Name of
plan sponsor**c** EIN-PN**a** Plan name**b** Name of
plan sponsor**c** EIN-PN**a** Plan name**b** Name of
plan sponsor**c** EIN-PN**a** Plan name**b** Name of
plan sponsor**c** EIN-PN**a** Plan name**b** Name of
plan sponsor**c** EIN-PN**a** Plan name**b** Name of
plan sponsor**c** EIN-PN**a** Plan name**b** Name of
plan sponsor**c** EIN-PN**a** Plan name**b** Name of
plan sponsor**c** EIN-PN**a** Plan name**b** Name of
plan sponsor**c** EIN-PN**a** Plan name**b** Name of
plan sponsor**c** EIN-PN**a** Plan name**b** Name of
plan sponsor**c** EIN-PN

SCHEDULE H (Form 5500) <small>Department of the Treasury Internal Revenue Service</small> <small>Department of Labor Employee Benefits Security Administration</small> <small>Pension Benefit Guaranty Corporation</small>	Financial Information This schedule is required to be filed under section 104 of the Employee Retirement Income Security Act of 1974 (ERISA), and section 6058(a) of the Internal Revenue Code (the Code). ► File as an attachment to Form 5500.	<small>OMB No. 1210-0110</small> 2014 This Form is Open to Public Inspection
For calendar plan year 2014 or fiscal plan year beginning <u>01/01/2014</u> and ending <u>12/31/2014</u>		
A Name of plan <u>THE ROWAN PENSION PLAN</u>		B Three-digit plan number (PN) ► <u>001</u>
C Plan sponsor's name as shown on line 2a of Form 5500 <u>ROWAN COMPANIES, INC.</u>		D Employer Identification Number (EIN) <u>75-0759420</u>

Part I Asset and Liability Statement			
1 Current value of plan assets and liabilities at the beginning and end of the plan year. Combine the value of plan assets held in more than one trust. Report the value of the plan's interest in a commingled fund containing the assets of more than one plan on a line-by-line basis unless the value is reportable on lines 1c(9) through 1c(14). Do not enter the value of that portion of an insurance contract which guarantees, during this plan year, to pay a specific dollar benefit at a future date. Round off amounts to the nearest dollar. MTIAs, CCTs, PSAs, and 103-12 IEs do not complete lines 1b(1), 1b(2), 1c(8), 1g, 1h, and 1i. CCTs, PSAs, and 103-12 IEs also do not complete lines 1d and 1e. See instructions.			
Assets		(a) Beginning of Year	(b) End of Year
a Total noninterest-bearing cash	1a		
b Receivables (less allowance for doubtful accounts):			
(1) Employer contributions.....	1b(1)	50406000	0
(2) Participant contributions.....	1b(2)		
(3) Other.....	1b(3)	28184	75
c General investments:			
(1) Interest-bearing cash (include money market accounts & certificates of deposit).....	1c(1)	10140065	8327511
(2) U.S. Government securities	1c(2)		
(3) Corporate debt instruments (other than employer securities):			
(A) Preferred	1c(3)(A)		
(B) All other	1c(3)(B)		
(4) Corporate stocks (other than employer securities):			
(A) Preferred	1c(4)(A)		
(B) Common.....	1c(4)(B)	0	1015
(5) Partnership/joint venture interests	1c(5)	107405024	56424258
(6) Real estate (other than employer real property).....	1c(6)		
(7) Loans (other than to participants)	1c(7)		
(8) Participant loans.....	1c(8)		
(9) Value of interest in common/collective trusts	1c(9)	361197488	438075557
(10) Value of interest in pooled separate accounts	1c(10)		
(11) Value of interest in master trust investment accounts	1c(11)		
(12) Value of interest in 103-12 investment entities.....	1c(12)		
(13) Value of interest in registered investment companies (e.g., mutual funds).....	1c(13)	65828165	86324934
(14) Value of funds held in insurance company general account (unallocated contracts).....	1c(14)		
(15) Other.....	1c(15)	100255	87620

1d Employer-related investments:

		(a) Beginning of Year	(b) End of Year
(1) Employer securities	1d(1)		
(2) Employer real property	1d(2)		
e Buildings and other property used in plan operation	1e		
f Total assets (add all amounts in lines 1a through 1e)	1f	595105181	589240970

Liabilities

g Benefit claims payable	1g		
h Operating payables	1h		
i Acquisition indebtedness	1i		
j Other liabilities	1j	2249735	0
k Total liabilities (add all amounts in lines 1g through 1j)	1k	2249735	0

Net Assets

l Net assets (subtract line 1k from line 1f)	1l	592855446	589240970
---	-----------	-----------	-----------

Part II Income and Expense Statement

2 Plan income, expenses, and changes in net assets for the year. Include all income and expenses of the plan, including any trust(s) or separately maintained fund(s) and any payments/receipts to/from insurance carriers. Round off amounts to the nearest dollar. MTIAs, CCTs, PSAs, and 103-12 IEs do not complete lines 2a, 2b(1)(E), 2e, 2f, and 2g.

Income

		(a) Amount	(b) Total
a Contributions:			
(1) Received or receivable in cash from: (A) Employers	2a(1)(A)		
(B) Participants	2a(1)(B)		
(C) Others (including rollovers)	2a(1)(C)		
(2) Noncash contributions	2a(2)		
(3) Total contributions. Add lines 2a(1)(A) , (B) , (C) , and line 2a(2)	2a(3)		0
b Earnings on investments:			
(1) Interest:			
(A) Interest-bearing cash (including money market accounts and certificates of deposit)	2b(1)(A)	332	
(B) U.S. Government securities	2b(1)(B)		
(C) Corporate debt instruments	2b(1)(C)		
(D) Loans (other than to participants)	2b(1)(D)		
(E) Participant loans	2b(1)(E)	61973	
(F) Other	2b(1)(F)		
(G) Total interest. Add lines 2b(1)(A) through (F)	2b(1)(G)		62305
(2) Dividends: (A) Preferred stock	2b(2)(A)		
(B) Common stock	2b(2)(B)	2917708	
(C) Registered investment company shares (e.g. mutual funds)	2b(2)(C)		
(D) Total dividends. Add lines 2b(2)(A) , (B) , and (C)	2b(2)(D)		2917708
(3) Rents	2b(3)		
(4) Net gain (loss) on sale of assets: (A) Aggregate proceeds	2b(4)(A)	5692733	
(B) Aggregate carrying amount (see instructions)	2b(4)(B)		
(C) Subtract line 2b(4)(B) from line 2b(4)(A) and enter result	2b(4)(C)		5692733
(5) Unrealized appreciation (depreciation) of assets: (A) Real estate	2b(5)(A)		
(B) Other	2b(5)(B)	-5189660	
(C) Total unrealized appreciation of assets. Add lines 2b(5)(A) and (B)	2b(5)(C)		-5189660

		(a) Amount	(b) Total
(6) Net investment gain (loss) from common/collective trusts.....	2b(6)		23549686
(7) Net investment gain (loss) from pooled separate accounts.....	2b(7)		
(8) Net investment gain (loss) from master trust investment accounts.....	2b(8)		
(9) Net investment gain (loss) from 103-12 investment entities.....	2b(9)		
(10) Net investment gain (loss) from registered investment companies (e.g., mutual funds).....	2b(10)		2928001
c Other income.....	2c		-6159
d Total income. Add all income amounts in column (b) and enter total.....	2d		29954614

Expenses

e Benefit payment and payments to provide benefits:			
(1) Directly to participants or beneficiaries, including direct rollovers.....	2e(1)	31143873	
(2) To insurance carriers for the provision of benefits.....	2e(2)		
(3) Other.....	2e(3)		
(4) Total benefit payments. Add lines 2e(1) through (3).....	2e(4)		31143873
f Corrective distributions (see instructions).....	2f		
g Certain deemed distributions of participant loans (see instructions).....	2g		
h Interest expense.....	2h		
i Administrative expenses: (1) Professional fees.....	2i(1)	313276	
(2) Contract administrator fees.....	2i(2)		
(3) Investment advisory and management fees.....	2i(3)	488481	
(4) Other.....	2i(4)	1623460	
(5) Total administrative expenses. Add lines 2i(1) through (4).....	2i(5)		2425217
j Total expenses. Add all expense amounts in column (b) and enter total.....	2j		33569090

Net Income and Reconciliation

k Net income (loss). Subtract line 2j from line 2d.....	2k		-3614476
l Transfers of assets:			
(1) To this plan.....	2l(1)		
(2) From this plan.....	2l(2)		

Part III Accountant's Opinion

3 Complete lines 3a through 3c if the opinion of an independent qualified public accountant is attached to this Form 5500. Complete line 3d if an opinion is not attached.

a The attached opinion of an independent qualified public accountant for this plan is (see instructions):

(1) ☐ Unqualified (2) ☐ Qualified (3) ☒ Disclaimer (4) ☐ Adverse

b Did the accountant perform a limited scope audit pursuant to 29 CFR 2520.103-8 and/or 103-12(d)?

☒ Yes ☐ No

c Enter the name and EIN of the accountant (or accounting firm) below:

(1) Name: MCCONNELL & JONES, L.L.P.

(2) EIN: 76-0488832

d The opinion of an independent qualified public accountant is **not attached** because:

(1) ☐ This form is filed for a CCT, PSA, or MTIA. (2) ☐ It will be attached to the next Form 5500 pursuant to 29 CFR 2520.104-50.

Part IV Compliance Questions

4 CCTs and PSAs do not complete Part IV. MTIAs, 103-12 IEs, and GIAs do not complete lines 4a, 4e, 4f, 4g, 4h, 4k, 4m, 4n, or 5. 103-12 IEs also do not complete lines 4j and 4l. MTIAs also do not complete line 4l.

During the plan year:

a Was there a failure to transmit to the plan any participant contributions within the time period described in 29 CFR 2510.3-102? Continue to answer "Yes" for any prior year failures until fully corrected. (See instructions and DOL's Voluntary Fiduciary Correction Program.).....

b Were any loans by the plan or fixed income obligations due the plan in default as of the close of the plan year or classified during the year as uncollectible? Disregard participant loans secured by participant's account balance. (Attach Schedule G (Form 5500) Part I if "Yes" is checked.).....

	Yes	No	Amount
4a		X	
4b		X	

	Yes	No	Amount
c Were any leases to which the plan was a party in default or classified during the year as uncollectible? (Attach Schedule G (Form 5500) Part II if "Yes" is checked.)		X	
4c			
d Were there any nonexempt transactions with any party-in-interest? (Do not include transactions reported on line 4a. Attach Schedule G (Form 5500) Part III if "Yes" is checked.)		X	
4d			
e Was this plan covered by a fidelity bond?	X		5000000
4e			
f Did the plan have a loss, whether or not reimbursed by the plan's fidelity bond, that was caused by fraud or dishonesty?		X	
4f			
g Did the plan hold any assets whose current value was neither readily determinable on an established market nor set by an independent third party appraiser?		X	
4g			
h Did the plan receive any noncash contributions whose value was neither readily determinable on an established market nor set by an independent third party appraiser?		X	
4h			
i Did the plan have assets held for investment? (Attach schedule(s) of assets if "Yes" is checked, and see instructions for format requirements.)	X		
4i			
j Were any plan transactions or series of transactions in excess of 5% of the current value of plan assets? (Attach schedule of transactions if "Yes" is checked, and see instructions for format requirements.)	X		
4j			
k Were all the plan assets either distributed to participants or beneficiaries, transferred to another plan, or brought under the control of the PBGC?		X	
4k			
l Has the plan failed to provide any benefit when due under the plan?		X	
4l			
m If this is an individual account plan, was there a blackout period? (See instructions and 29 CFR 2520.101-3.)			
4m			
n If 4m was answered "Yes," check the "Yes" box if you either provided the required notice or one of the exceptions to providing the notice applied under 29 CFR 2520.101-3.			
4n			

5a Has a resolution to terminate the plan been adopted during the plan year or any prior plan year?
 If "Yes," enter the amount of any plan assets that reverted to the employer this year. ☐ Yes ☒ No Amount:

5b If, during this plan year, any assets or liabilities were transferred from this plan to another plan(s), identify the plan(s) to which assets or liabilities were transferred. (See instructions.)

5b(1) Name of plan(s)	5b(2) EIN(s)	5b(3) PN(s)

5c If the plan is a defined benefit plan, is it covered under the PBGC insurance program (see ERISA section 4021)? ☒ Yes ☐ No ☐ Not determined

Part V Trust Information (optional)

6a Name of trust	6b Trust's EIN

SCHEDULE R (Form 5500) Department of the Treasury Internal Revenue Service Department of Labor Employee Benefits Security Administration Pension Benefit Guaranty Corporation	Retirement Plan Information This schedule is required to be filed under section 104 and 4065 of the Employee Retirement Income Security Act of 1974 (ERISA) and section 6058(a) of the Internal Revenue Code (the Code). ▶ File as an attachment to Form 5500.	OMB No. 1210-0110 2014 This Form is Open to Public Inspection.
---	--	--

For calendar plan year 2014 or fiscal plan year beginning 01/01/2014 and ending 12/31/2014

A Name of plan <u>THE ROWAN PENSION PLAN</u>	B Three-digit plan number (PN) ▶ <u>001</u>
C Plan sponsor's name as shown on line 2a of Form 5500 <u>ROWAN COMPANIES, INC.</u>	D Employer Identification Number (EIN) <u>75-0759420</u>

Part I	Distributions
---------------	----------------------

All references to distributions relate only to payments of benefits during the plan year.

1 Total value of distributions paid in property other than in cash or the forms of property specified in the instructions.....	1	<u>0</u>
2 Enter the EIN(s) of payor(s) who paid benefits on behalf of the plan to participants or beneficiaries during the year (if more than two, enter EINs of the two payors who paid the greatest dollar amounts of benefits): EIN(s): <u>13-3795042</u>		
Profit-sharing plans, ESOPs, and stock bonus plans, skip line 3.		
3 Number of participants (living or deceased) whose benefits were distributed in a single sum, during the plan year.....	3	<u>175</u>

Part II	Funding Information (If the plan is not subject to the minimum funding requirements of section 412 of the Internal Revenue Code or ERISA section 302, skip this Part)
----------------	--

4 Is the plan administrator making an election under Code section 412(d)(2) or ERISA section 302(d)(2)?.....	☐ Yes	☒ No	☐ N/A
If the plan is a defined benefit plan, go to line 8.			
5 If a waiver of the minimum funding standard for a prior year is being amortized in this plan year, see instructions and enter the date of the ruling letter granting the waiver. Date: Month _____ Day _____ Year _____ If you completed line 5, complete lines 3, 9, and 10 of Schedule MB and do not complete the remainder of this schedule.			
6 a Enter the minimum required contribution for this plan year (include any prior year accumulated funding deficiency not waived).....	6a		
b Enter the amount contributed by the employer to the plan for this plan year.....	6b		
c Subtract the amount in line 6b from the amount in line 6a. Enter the result (enter a minus sign to the left of a negative amount)	6c		
If you completed line 6c, skip lines 8 and 9.			
7 Will the minimum funding amount reported on line 6c be met by the funding deadline?.....	☐ Yes	☐ No	☐ N/A
8 If a change in actuarial cost method was made for this plan year pursuant to a revenue procedure or other authority providing automatic approval for the change or a class ruling letter, does the plan sponsor or plan administrator agree with the change?.....	☐ Yes	☐ No	☒ N/A

Part III	Amendments
-----------------	-------------------

9 If this is a defined benefit pension plan, were any amendments adopted during this plan year that increased or decreased the value of benefits? If yes, check the appropriate box. If no, check the "No" box.....	☒ Increase	☐ Decrease	☐ Both	☐ No
--	--	-----------------------------------	-------------------------------	-----------------------------

Part IV	ESOPs (see instructions). If this is not a plan described under Section 409(a) or 4975(e)(7) of the Internal Revenue Code, skip this Part.
----------------	---

10 Were unallocated employer securities or proceeds from the sale of unallocated securities used to repay any exempt loan?	☐ Yes	☐ No
11 a Does the ESOP hold any preferred stock?	☐ Yes	☐ No
b If the ESOP has an outstanding exempt loan with the employer as lender, is such loan part of a "back-to-back" loan? (See instructions for definition of "back-to-back" loan.).....	☐ Yes	☐ No
12 Does the ESOP hold any stock that is not readily tradable on an established securities market?.....	☐ Yes	☐ No

Part V Additional Information for Multiemployer Defined Benefit Pension Plans

13 Enter the following information for each employer that contributed more than 5% of total contributions to the plan during the plan year (measured in dollars). See instructions. *Complete as many entries as needed to report all applicable employers.*

a Name of contributing employer

b EIN

c Dollar amount contributed by employer

d Date collective bargaining agreement expires (If employer contributes under more than one collective bargaining agreement, check box ☐ and see instructions regarding required attachment. Otherwise, enter the applicable date.) Month _____ Day _____ Year _____

e Contribution rate information (If more than one rate applies, check this box ☐ and see instructions regarding required attachment. Otherwise, complete lines 13e(1) and 13e(2).)

(1) Contribution rate (in dollars and cents) _____

(2) Base unit measure: ☐ Hourly ☐ Weekly ☐ Unit of production ☐ Other (specify): _____

a Name of contributing employer

b EIN

c Dollar amount contributed by employer

d Date collective bargaining agreement expires (If employer contributes under more than one collective bargaining agreement, check box ☐ and see instructions regarding required attachment. Otherwise, enter the applicable date.) Month _____ Day _____ Year _____

e Contribution rate information (If more than one rate applies, check this box ☐ and see instructions regarding required attachment. Otherwise, complete lines 13e(1) and 13e(2).)

(1) Contribution rate (in dollars and cents) _____

(2) Base unit measure: ☐ Hourly ☐ Weekly ☐ Unit of production ☐ Other (specify): _____

a Name of contributing employer

b EIN

c Dollar amount contributed by employer

d Date collective bargaining agreement expires (If employer contributes under more than one collective bargaining agreement, check box ☐ and see instructions regarding required attachment. Otherwise, enter the applicable date.) Month _____ Day _____ Year _____

e Contribution rate information (If more than one rate applies, check this box ☐ and see instructions regarding required attachment. Otherwise, complete lines 13e(1) and 13e(2).)

(1) Contribution rate (in dollars and cents) _____

(2) Base unit measure: ☐ Hourly ☐ Weekly ☐ Unit of production ☐ Other (specify): _____

a Name of contributing employer

b EIN

c Dollar amount contributed by employer

d Date collective bargaining agreement expires (If employer contributes under more than one collective bargaining agreement, check box ☐ and see instructions regarding required attachment. Otherwise, enter the applicable date.) Month _____ Day _____ Year _____

e Contribution rate information (If more than one rate applies, check this box ☐ and see instructions regarding required attachment. Otherwise, complete lines 13e(1) and 13e(2).)

(1) Contribution rate (in dollars and cents) _____

(2) Base unit measure: ☐ Hourly ☐ Weekly ☐ Unit of production ☐ Other (specify): _____

a Name of contributing employer

b EIN

c Dollar amount contributed by employer

d Date collective bargaining agreement expires (If employer contributes under more than one collective bargaining agreement, check box ☐ and see instructions regarding required attachment. Otherwise, enter the applicable date.) Month _____ Day _____ Year _____

e Contribution rate information (If more than one rate applies, check this box ☐ and see instructions regarding required attachment. Otherwise, complete lines 13e(1) and 13e(2).)

(1) Contribution rate (in dollars and cents) _____

(2) Base unit measure: ☐ Hourly ☐ Weekly ☐ Unit of production ☐ Other (specify): _____

a Name of contributing employer

b EIN

c Dollar amount contributed by employer

d Date collective bargaining agreement expires (If employer contributes under more than one collective bargaining agreement, check box ☐ and see instructions regarding required attachment. Otherwise, enter the applicable date.) Month _____ Day _____ Year _____

e Contribution rate information (If more than one rate applies, check this box ☐ and see instructions regarding required attachment. Otherwise, complete lines 13e(1) and 13e(2).)

(1) Contribution rate (in dollars and cents) _____

(2) Base unit measure: ☐ Hourly ☐ Weekly ☐ Unit of production ☐ Other (specify): _____

- 14** Enter the number of participants on whose behalf no contributions were made by an employer as an employer of the participant for:

a The current year	14a	
b The plan year immediately preceding the current plan year	14b	
c The second preceding plan year	14c	

- 15** Enter the ratio of the number of participants under the plan on whose behalf no employer had an obligation to make an employer contribution during the current plan year to:

a The corresponding number for the plan year immediately preceding the current plan year	15a	
b The corresponding number for the second preceding plan year	15b	

- 16** Information with respect to any employers who withdrew from the plan during the preceding plan year:

a Enter the number of employers who withdrew during the preceding plan year	16a	
b If line 16a is greater than 0, enter the aggregate amount of withdrawal liability assessed or estimated to be assessed against such withdrawn employers	16b	

- 17** If assets and liabilities from another plan have been transferred to or merged with this plan during the plan year, check box and see instructions regarding supplemental information to be included as an attachment. ☐

Part VI Additional Information for Single-Employer and Multiemployer Defined Benefit Pension Plans

- 18** If any liabilities to participants or their beneficiaries under the plan as of the end of the plan year consist (in whole or in part) of liabilities to such participants and beneficiaries under two or more pension plans as of immediately before such plan year, check box and see instructions regarding supplemental information to be included as an attachment ☐

- 19** If the total number of participants is 1,000 or more, complete lines (a) through (c)

- a** Enter the percentage of plan assets held as:

Stock: 58.0% Investment-Grade Debt: 22.0% High-Yield Debt: 2.0% Real Estate: 7.0% Other: 11.0%

- b** Provide the average duration of the combined investment-grade and high-yield debt:

☐ 0-3 years ☒ 3-6 years ☐ 6-9 years ☐ 9-12 years ☐ 12-15 years ☐ 15-18 years ☐ 18-21 years ☐ 21 years or more

- c** What duration measure was used to calculate line 19(b)?

☒ Effective duration ☐ Macaulay duration ☐ Modified duration ☐ Other (specify):

ROWAN PENSION PLAN

Financial Statements
And Independent Auditors' Report

December 31, 2014 and 2013

**ROWAN PENSION PLAN
DECEMBER 31, 2014 AND 2013**

TABLE OF CONTENTS

	Page
INDEPENDENT AUDITORS' REPORT	1
FINANCIAL STATEMENTS:	
Statements of Net Assets Available for Benefits	3
Statements of Changes in Net Assets Available for Benefits	4
Notes to Financial Statements	5
SUPPLEMENTARY INFORMATION	
Schedule H, Line 4i – Schedule of Assets (Held at End of Year)	16
Schedule H, Line 4j – Schedule of Reportable Transactions	17



Independent Auditors' Report

To the Participants and Plan Administrator of
Rowan Pension Plan

Report on the Financial Statements

We were engaged to audit the accompanying financial statements of Rowan Pension Plan (the Plan), which comprise the Statements of Net Assets Available for Benefits as of December 31, 2014 and 2013, and the related Statements of Changes in Net Assets Available for Benefits for the years then ended, and the related Notes to Financial Statements.

Plan Management's Responsibility for the Financial Statements

Plan management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditors' Responsibility

Our responsibility is to express an opinion on these financial statements based on conducting the audit in accordance with auditing standards generally accepted in the United States of America (US GAAS). Because of the matter described in the *Basis for Disclaimer of Opinion* paragraph, however, we were not able to obtain sufficient appropriate audit evidence to provide a basis for an audit opinion.

Basis for Disclaimer of Opinion

As permitted by 29 CFR 2520.103-8 of the Department of Labor's (DOL) Rules and Regulations for Reporting and Disclosure under the Employee Retirement Income Security Act of 1974 (ERISA), Plan management instructed us not to perform, and we did not perform, any auditing procedures with respect to the investment information summarized in Note 3, which was certified by JPMorgan Chase Bank, the trustee of the Plan (Trustee), except for comparing such information with the related information included in the financial statements. We have been informed by Plan management that the Trustee holds the Plan's investment assets and executes investment transactions. Plan management has obtained a certification from the Trustee as of December 31, 2014 and 2013 and for the years then ended, that the information provided to Plan management by the Trustee is complete and accurate.

Disclaimer of Opinion

Because of the significance of the matter described in the *Basis for Disclaimer of Opinion* paragraph, we have not been able to obtain sufficient appropriate audit evidence to provide a basis for an audit opinion. Accordingly, we do not express an opinion on these financial statements.

Other Matter

The supplementary information listed in the table of contents as of and for the year ended December 31, 2014 is required by DOL Rules and Regulations for Reporting and Disclosure under ERISA and is presented for the purpose of additional analysis and is not a required part of the financial statements. Because of the significance of the matter described in the *Basis for Disclaimer of Opinion* paragraph, we do not express an opinion on this supplementary information.

Report on Form and Content in Compliance with DOL Rules and Regulations

The form and content of the information included in the financial statements, other than that derived from the information certified by the Trustee has been audited by us in accordance with US GAAS and, in our opinion, is presented in compliance with DOL Rules and Regulations for Reporting and Disclosure under ERISA.

McConnell & Jones LLP

Houston, Texas
October 12, 2015

ROWAN PENSION PLAN

STATEMENTS OF NET ASSETS AVAILABLE FOR BENEFITS

DECEMBER 31, 2014 AND 2013

	<u>2014</u>	<u>2013</u>
ASSETS:		
Investments, at fair value		
Money market fund	\$ 8,327,511	\$ 10,140,065
Registered investment companies	86,324,934	65,828,165
Common/collective trust	438,075,557	361,197,488
Partnerships/joint venture interest	56,424,258	107,405,024
Other assets	<u>88,635</u>	<u>100,255</u>
 Total investments	<u>589,240,895</u>	<u>544,670,997</u>
 Receivables:		
Employer contributions	-	50,406,000
Other receivables	<u>75</u>	<u>28,184</u>
 Total receivables	<u>75</u>	<u>50,434,184</u>
 Total assets	589,240,970	595,105,181
 LIABILITIES		
Others payables	<u>-</u>	<u>2,249,735</u>
 NET ASSETS AVAILABLE FOR BENEFITS	<u>\$ 589,240,970</u>	<u>\$ 592,855,446</u>

See Notes to Financial Statements

ROWAN PENSION PLAN

STATEMENTS OF CHANGES IN NET ASSETS AVAILABLE FOR BENEFITS

YEARS ENDED DECEMBER 31, 2014 AND 2013

	<u>2014</u>	<u>2013</u>
ADDITIONS:		
Net appreciation in fair value of investments	\$ 27,036,574	\$ 67,708,647
Interest and dividends	2,918,040	4,785,394
Employer contributions	<u>-</u>	<u>50,406,000</u>
TOTAL ADDITIONS	<u>29,954,614</u>	<u>122,900,041</u>
DEDUCTIONS:		
Benefit payments	31,143,873	39,301,400
Administrative expenses	<u>2,425,217</u>	<u>2,886,393</u>
TOTAL DEDUCTIONS	<u>33,569,090</u>	<u>42,187,793</u>
NET DECREASE BEFORE TRANSFER	(3,614,476)	80,712,248
Transfers in	<u>-</u>	<u>45,912,045</u>
NET DECREASE	(3,614,476)	126,624,293
NET ASSETS AVAILABLE FOR BENEFITS		
Beginning of year	<u>592,855,446</u>	<u>466,231,153</u>
End of year	<u><u>\$ 589,240,970</u></u>	<u><u>\$ 592,855,446</u></u>

See Notes to Financial Statements

ROWAN PENSION PLAN
NOTES TO FINANCIAL STATEMENTS
DECEMBER 31, 2014 AND 2013

NOTE 1: DESCRIPTION OF THE PLAN

The following description of the Rowan Pension Plan (the Plan) is provided for general informational purposes only. Participants should refer to the Plan document and the *Summary Plan Description* for more complete information.

General

The Plan is a defined benefit pension plan covering eligible employees of Rowan Companies, Inc. (Rowan) and its drilling company subsidiaries. The Plan Administrative Committee of Rowan and the plan administrator control and manage the operation and administration of the Plan. The Plan is subject to the provisions of the Employee Retirement Income Security Act of 1974 (ERISA).

Effective January 1, 2013, the LeTourneau Technologies, Inc. Retirement Income Plan (LeTourneau Group) was merged into the Plan. In connection with this merger, assets amounting to \$45,912,045 were transferred to the Plan and are presented as Transfers In on the Statement of Changes in Net Assets Available for Benefits for the year ended December 31, 2013.

Pension Benefits

Employees are entitled to pension benefits upon retirement, after three years of service as defined by the Plan. There is no partial vesting of benefits. The Plan provides for normal retirement benefits upon reaching the age of 60 and for early retirement benefits between the ages of 40-59. The Plan also has provisions for death benefits and for benefits payable upon meeting certain other conditions.

Upon retirement, the amount of annual benefits under the Plan for participants hired before January 1, 2008, is determined under a traditional defined benefit formula as 1.75% of the compensation base, as defined in the Plan document, multiplied by the number of years of service. The Plan provides for an annual cost-of-living adjustment to benefits of up to 2%. Employees hired on or after January 1, 2008, are subject to a cash balance benefit formula. Such employees are credited with an amount every year equal to 5% of their cash compensation paid during the year. The account balance is also credited with interest each quarter based on the 10-year Treasury rate.

On June 30, 2009, the traditional defined benefit formula under the Plan was frozen. Effective with the amendment and restatement of the Plan, on July 1, 2009, the Plan transitioned to the new cash balance formula for future benefits as described above. A participant's total benefit is calculated as the sum of (i) the value of the traditional defined benefit at June 30, 2009 (Frozen Benefit), plus (ii) the cash balance benefit, which increases annually. In addition, employees whose age plus years of vesting service on June 30, 2009 was equal to 50 or greater will receive annual transition pay credits as defined in the Plan

ROWAN PENSION PLAN
NOTES TO FINANCIAL STATEMENTS
DECEMBER 31, 2014 AND 2013

document. Future benefits, under the cash balance formula, accrue at a lower amount than the traditional defined benefit formula.

Employees of LeTourneau Group who have attained normal retirement age are entitled to the following monthly benefits:

- (1) 1% of the average monthly compensation, less 1% of the monthly primary Social Security Benefit, multiplied by the total years of service; plus
- (2) Monthly accrued benefit derived from member contributions transferred from a predecessor plan, if any.

Normal retirement age is the later of the date the employee reaches age 65 or the fifth anniversary of the date participation commenced. There is no partial vesting of benefits. Participants may elect early retirement upon attaining the age of 55 or upon any date between the ages of 55 and 65, after completing five years of service. Benefits will be reduced according to the formula specified in the Plan agreement. Participants may elect to postpone retirement beyond normal retirement age and will continue to accrue benefits based on monthly average compensation earned to the earlier of the date of actual retirement or age 70½. Unless a retired participant elects otherwise, a married participant will receive an actuarially reduced benefit, payable for life and, upon his or her death, 50% of the benefit will be payable to the surviving spouse. An unmarried participant will receive an unreduced benefit for only his or her lifetime.

Plan Termination

Rowan expects to continue the Plan indefinitely but reserves the right to terminate it by duly adopted written resolutions of its Board of Directors.

In the event the Plan terminates, the assets of the Plan will be allocated, as prescribed by Section 4044 of ERISA and its related regulations, generally to provide the following benefits in the order indicated:

- (1) Vested benefits insured by the Pension Benefit Guaranty Corporation (the PBGC) up to the applicable limitations (discussed below).
- (2) All other vested benefits (those not insured by the PBGC).
- (3) All nonvested benefits.

Certain benefits under the Plan are insured by the PBGC if the Plan terminates. Generally, the PBGC guarantees most vested, normal retirement age benefits and certain disability and survivors' pensions. However, the PBGC does not guarantee all types of benefits under the Plan, and the amount of benefit protection is subject to certain limitations.

Whether all participants receive their benefit should the Plan terminate, at some future time, will depend on the sufficiency, at that time, of the Plan's net assets to provide those benefits and may also depend on the level of benefits guaranteed by the PBGC.

ROWAN PENSION PLAN
NOTES TO FINANCIAL STATEMENTS
DECEMBER 31, 2014 AND 2013

NOTE 2: SIGNIFICANT ACCOUNTING POLICIES

Basis of Accounting

The financial statements are prepared on the accrual basis of accounting in accordance with accounting principles generally accepted in the United States of America (US GAAP).

Use of Estimates

The preparation of financial statements in conformity with US GAAP requires management to make estimates and assumptions that affect the reported amounts of assets, liabilities and the actuarial present value of accumulated plan benefits and changes therein, and disclosure of contingent assets and liabilities. Actual results could differ from those estimates.

Investment Valuation and Income Recognition

In 2014 and 2013, the assets of the Plan were held by JPMorgan Chase Bank, N.A. (the Trustee) under a trust agreement adopted by Rowan. The terms of the trust agreement provides investment managers and the Trustee with full discretionary authority for the purchase and sale of investments.

The Plan's investments are stated at fair value as determined by the Trustee based on the latest quoted market values of the underlying securities.

Purchases and sales of securities are recorded on a trade-date basis. Interest income is recorded as earned and dividends are recorded on the ex-dividend date. The net increase in fair value of investments consists of the net change in unrealized gains (losses) in fair values and realized gains (losses) upon the sale of investment securities. The net change in unrealized gains (losses) and realized gains (losses) upon sale are determined using the fair values as of the beginning of the year or the purchase price if acquired during the year.

As defined in Financial Accounting Standards Board (FASB) Accounting Standards Codification (ASC) 820, *Fair Value Measurements and Disclosures* (FASB ASC 820), fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. When determining the fair value measurements for assets and liabilities required to be recorded at fair value, the Plan considers the principal or most advantageous market in which it would transact and considers assumptions that market participants would use when pricing the asset or liability, such as inherent risk, transfer restrictions, and risk of nonperformance.

FASB ASC 820 establishes a framework for measuring fair value as it relates to financial assets and liabilities and to nonfinancial assets and liabilities measured at fair value on a recurring basis. That framework provides a three-level valuation hierarchy based upon observable and unobservable inputs, with preference given to observable inputs. The three levels of the fair value hierarchy under FASB ASC 820 are described below:

ROWAN PENSION PLAN
NOTES TO FINANCIAL STATEMENTS
DECEMBER 31, 2014 AND 2013

- Level 1: Inputs are unadjusted quoted prices in active markets for identical assets or liabilities;
- Level 2: Inputs, other than quoted prices included in Level 1 that are observable either directly or indirectly. Level 2 inputs include quoted prices for similar assets or liabilities in active markets, and inputs other than quoted prices that are observable for the assets or liabilities; and
- Level 3: Inputs are unobservable for the asset or liability, and include situations where there is little, if any, market activity for the asset or liability. Unobservable inputs reflect the Plan's judgments about the assumptions market participants would use in pricing the asset or liability since limited market data exists. Unobservable inputs are based on the best information available in the circumstances.

The asset or liability's fair value measurement level within the fair value hierarchy is based on the lowest level of any input that is significant to the fair value measurement. Valuation techniques used need to maximize the use of observable inputs.

Money market fund: This fund is valued using unadjusted quoted market prices for identical assets.

Mutual funds: Valued at the daily closing price as reported by the fund. Mutual funds held by the Plan are open-end mutual funds that are registered with the Securities and Exchange Commission. These funds are required to publish their daily net asset value (NAV) and to transact at that price. The mutual funds held by the Plan are deemed to be actively traded.

Common/collective trusts: The interest in the common/collective trusts is stated at NAV provided by the administrator of the funds. The NAV is used as a practical expedient and is based on the value of the underlying assets owned by the funds, minus its liabilities, and divided by the number of units outstanding. The funds are classified within Level 2 of the valuation hierarchy because the underlying investments are traded in an active market.

Limited Partnerships: The interest in these funds has been valued using the limited partner's capital contributions, withdrawal or distributions, the allocation of the partnership's net profits and losses and any other capital account adjustments. Investments in this category are generally classified as Level 3, however, investments may be classified as Level 2 if net asset value is determined and the investment is redeemable at NAV in the capital account on a regular frequency.

ROWAN PENSION PLAN
NOTES TO FINANCIAL STATEMENTS
DECEMBER 31, 2014 AND 2013

Contributions

Contributions to the Plan from Rowan are recorded in the period that the Plan's actuary determines they relate to except that a contribution receivable is recorded to the extent that amounts due are pursuant to formal commitments as well as legal or contractual requirements in existence at the end of the Plan year.

Payment of Benefits

Benefits are recorded when paid.

Expenses of the Plan

Most expenses incurred in the administration of the Plan are paid by the Plan. These expenses include fees and expenses of the Trustees, fund managers and consultants. Any other expenses incurred in the operation of the Plan are paid by Rowan.

Actuarial Present Value of Accumulated Plan Benefits

Accumulated benefits are those future periodic payments that are attributable under the Plan's provisions to the service employees have rendered. Accumulated plan benefits include benefits expected to be paid to (a) retired or terminated employees or their beneficiaries, (b) beneficiaries of employees who have died and (c) present employees or their beneficiaries. The accumulated plan benefits for active employees are based on eligible earnings and credited service on the date on which the benefit information is presented (the valuation date). Benefits payable under all circumstances (retirement, death, and termination of employment) are included to the extent they are deemed attributable to employee service rendered to the valuation date.

Management's Review of Subsequent Events

In preparing the accompanying financial statements, Plan management has reviewed all known events that have occurred after December 31, 2014, through October 12, 2015, for inclusion in the financial statements and footnotes.

Recently Issued Accounting Pronouncements

In May 2015, the Financial Accounting Standards Board (FASB) issued Accounting Standards Update (ASU) No. 2015-07, *Disclosures for Investments in Certain Entities That Calculate Net Asset Value (NAV) per Share (or its equivalent)* (ASU 2015-07). ASU 2015-07 removes the requirement to include investments in the fair value hierarchy for which fair value is measured using the net asset value per share practical expedient under Accounting Standards Codification (ASC) 820. ASU 2015-07 is effective for the Plan retrospectively for the year beginning after December 15, 2016 with early adoption permitted. Plan management believes the adoption of this guidance concerns disclosure only and will not have an impact on the Plan's financial statements.

In July 2015, the FASB issued ASU No. 2015-12, "*(Part II) Plan Investment Disclosures, (Part III) Measurement Date Practical Expedient*" — consensus of the Emerging Issues

ROWAN PENSION PLAN
NOTES TO FINANCIAL STATEMENTS

DECEMBER 31, 2014 AND 2013

Task Force (ASU No. 2015-12). ASU 2015-12 (1) requires a pension plan to use contract value as the only measure for fully benefit-responsive investment contracts, (2) simplifies and increases the effectiveness of the investment disclosure requirements for employee benefit plans, and (3) provides benefit plans with a measurement-date practical expedient similar to the practical expedient provided to employers in ASU 2015-04, *Practical Expedient for the Measurement Date of an Employer's Defined Benefit Obligation and Plan Assets*. ASU 2015-12 is effective for fiscal years beginning after December 31, 2015, with early application permitted. The Plan is required to apply the amendments retrospectively for all statements presented except for Part III which requires a prospective application. Plan management believes the adoption of this guidance concerns disclosure only and will not have an impact on the Plan's financial statements.

NOTE 3: INVESTMENT AND INVESTMENT INCOME (CERTIFIED BY TRUSTEE)

The following presents the Plan's investments and related investment income as of December 31, 2014 and 2013 and for the year ended December 31, 2014. This information has been certified by JPMorgan Chase Bank, the trustee of the Plan, (Trustee), as permitted by 29 CFR 2520.103-8 of the Department of Labor rules under ERISA.

Investments that represent 5% or more of the plan net assets in either year are separately identified.

	<u>2014</u>	<u>2013</u>
Mutual funds:		
Western Asset Fund Inc Core Plus Bond IS	\$ 86,324,934	\$ 65,828,165
Common / Collective Trust:		
SSGA Russell 2000 Index NL Fund	38,106,325	36,302,183
SSGA MSCI ACWI EX USA Non-Lending Fund	135,946,656	118,529,502
SSGA S&P 500 Flagship Non-Lending Fund	159,540,695	125,060,945
SSGA U.S. Aggregate Bond Index Non-Lending Fund	85,412,133	66,073,563
Partnership/ Joint Venture:		
AQR International Small Cap Equity Trust	29,736,403 *	31,270,144
Other investments less than 5% individually	<u>54,173,749</u>	<u>101,606,495</u>
Investments, at fair value	<u>\$ 589,240,895</u>	<u>\$ 544,670,997</u>

* Investment represented less than 5% of net assets available for benefits in the period indicated

ROWAN PENSION PLAN
NOTES TO FINANCIAL STATEMENTS

DECEMBER 31, 2014 AND 2013

During the year ended December 31, 2014, the Plan's investments (including gains and losses on investments bought, sold and held during the year) appreciated in value as follows:

	2014
Mutual funds	\$ 2,928,001
Partnerships	503,073
Common collective trusts	23,549,686
Other	<u>55,814</u>
Net appreciation in fair value of investments	<u><u>\$ 27,036,574</u></u>

NOTE 4: FAIR VALUE MEASUREMENTS

In accordance with FASB ASC 820, the following table sets forth by level, within the fair value hierarchy, the Plan's assets at fair value as of December 31, 2014:

	2014	2013
Level 1:		
Money Market Fund	\$ 8,327,511	\$ 10,140,065
Mutual Funds	86,324,934	65,828,165
	<u>94,652,445</u>	<u>75,968,230</u>
Level 2:		
Common / Collective Trust	438,075,557	361,197,488
Limited Partnerships/Joint ventures	56,424,258	56,094,050
Other Assets	88,635	100,255
	<u>494,588,450</u>	<u>417,391,793</u>
Level 3:		
Limited Partnership	<u>-</u>	<u>51,310,974</u>
Total investments at fair value	<u><u>\$ 589,240,895</u></u>	<u><u>\$ 544,670,997</u></u>

NOTE 5: FUNDING POLICY

Contributions to the Plan are made solely by Rowan in amounts not less than that required by ERISA. Annual contributions are computed by the Plan's actuary, which used the traditional unit credit actuarial cost method for the plan years ended December 31, 2014 and 2013.

The Internal Revenue Code (IRC) generally requires that estimated annual employer contributions be made through quarterly installments, with final amounts paid by September 15 of the following year. Rowan elected to contribute \$0 and \$50,406,000 to the Plan for 2014 and 2013 respectively, which meets the funding requirement for 2014 and 2013.

ROWAN PENSION PLAN
NOTES TO FINANCIAL STATEMENTS
DECEMBER 31, 2014 AND 2013

NOTE 6: RISKS AND UNCERTAINTIES

The Plan invests in various investment securities. Investment securities are exposed to various risks, such as interest rate, market and credit risks. Due to the level of risk associated with certain investment securities, it is at least reasonably possible that changes in the values of investment securities will occur in the near term and that such changes could materially affect the amounts reported in the statement of net assets available for benefits.

Plan contributions are made and the actuarial present value of accumulated plan benefits are reported based on certain assumptions pertaining to interest rates, inflation rates and employee demographics, all of which are subject to change. Due to uncertainties inherent in the estimations and assumptions process, it is at least reasonably possible that changes in these estimates and assumptions in the near term would be material to the financial statements.

NOTE 7: INCOME TAX STATUS

The Internal Revenue Service (IRS) has determined and informed Rowan by a letter dated January 30, 2012, that the Plan and related trust are designed in accordance with applicable sections of the IRC.

US GAAP requires plan management to evaluate uncertain tax positions taken by the Plan. The financial statement effects of a tax position are recognized when the position is more likely than not, based on the technical merits, to be sustained upon examination by the IRS. The Plan administrator has analyzed the tax positions taken by the Plan, and has concluded that as of December 31, 2014, there are no uncertain positions taken or expected to be taken. The Plan has recognized no interest or penalties related to uncertain tax positions. The Plan is subject to routine audits by taxing jurisdictions; however, there are currently no audits for any tax periods in progress. The Plan administrator believes it is no longer subject to income tax examinations for years prior to 2011.

NOTE 8: PARTY-IN-INTEREST TRANSACTIONS

Certain plan investments are managed by JPMorgan Chase Bank, N.A., the trustee of the Plan. Therefore, these transactions qualify as party-in-interest transactions; however, they are exempt from the prohibited transactions rules under ERISA.

NOTE 9: ACCUMULATED PLAN BENEFITS

The actuarial present value of accumulated plan benefits is determined by the Plan's actuary, Mercer, and is the amount that results from applying actuarial assumptions to adjust the accumulated plan benefits to reflect the time value of money (through discounts for interest) and the probability of payment (by means of decrements such as for death, disability,

ROWAN PENSION PLAN
NOTES TO FINANCIAL STATEMENTS

DECEMBER 31, 2014 AND 2013

withdrawal or retirement) between the valuation date and the expected date of payment. The significant actuarial assumptions used in the valuation as of January 1, 2014 and 2013 were as follows:

- i. The mortality assumption was updated from RP-2000 Combined Healthy Mortality Table for males and females with a blue collar adjustment projected to 2018 with Scale AA to RP-2000 Combined Healthy Mortality Table for males and females with a blue collar adjustment projected to 2020 with Scale AA.
- ii. Retirement age assumptions (ages 50-59 – 2%, age 60 – 40%, age 61 – 5%, age 62 – 40%, ages 63-64 – 5%, age 65-40%, ages 66-69 – 5% and age 70 – 100%) – unchanged from prior year.
- iii. Disability assumptions (age 20 – 0.09%, age 25 – 0.1%, age 30 – 0.11%, age 35 – 0.12%, age 40 – 0.15%, age 45 – 0.215%, age 50 – 0.33%, age 55 – 0.58% and age 60 – 1.18%) – unchanged from prior year.
- iv. Cost of living increase on benefit remained at 1.75% per annum, compounded annually
- v. Discount rate remained at 8% per annum.

Lump sums are valued using the applicable mortality and segment rates under IRC 417 (e). The rates used for December 31, 2013 funded status, fiscal year ending December 31, 2014 expense determination and as of January 1, 2014 for ASC 960 are 1.19%, 4.53% and 5.66%.

The foregoing actuarial assumptions are based on the presumption that the Plan will continue. If the Plan were to terminate, different actuarial assumptions and other factors might be applicable in determining the actuarial present value of accumulated plan benefits.

The accumulated plan benefits information at January 1, 2014 is as follows:

	<u>2014</u>
Actuarial present value of accumulated plan benefits:	
Vested benefits:	
Participants currently receiving benefits	\$ 260,524,569
Active participants	104,139,171
Inactive participants with deferred benefits	<u>111,104,902</u>
Total vested benefits	475,768,642
Non-vested benefits	<u>621,124</u>
 Total actuarial present value of accumulated plan benefits	 <u><u>\$ 476,389,766</u></u>

ROWAN PENSION PLAN
NOTES TO FINANCIAL STATEMENTS

DECEMBER 31, 2014 AND 2013

The change in the actuarial present value of accumulated plan benefits from January 1, 2013, to January 1, 2014, is attributed to the following:

Actuarial present value of accumulated plan benefits at January 1, 2013	<u>\$ 467,614,887</u>
Increase (decrease) during the year attributable to:	
Benefits accumulated and (gains) losses	9,842,491
Increase for interest due to the decrease in the discount period	35,706,352
Benefits paid	(39,296,291)
Changes in actuarial assumptions	<u>2,522,327</u>
Net increase	<u>8,774,879</u>
Actuarial present value of accumulated plan benefits at January 1, 2014	<u>\$ 476,389,766</u>

NOTE 10: NAV PER SHARE

In accordance with FASB ASU No. 2009-12, *Investments in Certain Entities That Calculate Net Asset Value per Share (or Its Equivalent)*, the Plan expanded its disclosure to include the category, fair value, redemption frequency, and redemption notice period for those assets whose fair value is estimated using the net asset value per share or its equivalent for which the fair value is not readily determinable as of December 31, 2014 and 2013. For the Plan, such assets include investments in common collective trust funds and limited partnerships.

ROWAN PENSION PLAN

NOTES TO FINANCIAL STATEMENTS

DECEMBER 31, 2014 AND 2013

The following tables for December 31, 2014, sets forth a summary of the Plan's investments with a reported NAV.

	Fair Value Estimated Using NAV per Share					
	Fair Value as of 12/31/2014 *	Fair Value as of 12/31/2013*	Unfunded Commitment	Redemption Frequency	Other Redemption Restrictions	Redemption Notice Period
SSGA Russell 2000 Index NL Fund ^(a)	38,106,325	36,302,183	None	Daily	None	2 days
SSGA MSCI ACWI Ex US Non-Lending Fund ^(b)	135,946,656	118,529,502	None	Semi-monthly	None	5 days
SSGA S&P 500 Flagship Non-Lending Fund ^(c)	159,540,695	125,060,945	None	Daily	None	2 days
SSGA U.S. Aggregate Bond Index Non-Lending Fund ^(d)	85,412,133	66,073,563	None	Daily	None	2 days
CenterSquare EB Global Real Estate ^(e)	19,069,748	15,231,295	None	Daily	None	Immediate
UBS Trumbull Property Fund ^(f)	26,687,855	24,823,906	None	End of a calendar quarter	None	60 days

* The fair value of the investment has been estimated using the NAV of the investment.

(a) The fund seeks investment results that correspond generally to the price and yield performance of the Russell 2000 Index.

(b) The fund seeks investment results that correspond generally to the price and yield performance of the MSCI All Country World Index ex USA.

(c) The fund seeks investment results that correspond generally to the price and yield performance of the S&P 500 Index.

(d) The fund invests in a well-diversified portfolio that is representative of the broad domestic bond market consisting primarily of government, corporate, mortgage-backed and asset-backed securities with maturities of greater than one year.

(e) The fund is primarily invested in a diversified portfolio of listed property companies around the world. The fund also invests in dollar and non-dollar instruments, including equity securities traded on foreign exchanges.

(f) The fund invests primarily in equity real estate investments located in the United States.

Supplementary Information

ROWAN PENSION PLAN
EIN: 75-0759420 Plan Number: 001

Form 5500 Schedule H, Line 4i
Schedule of Assets (Held at End of Year)

December 31, 2014

[a] Party- in- interest	[b] Identity of Issue, Borrower, Lessor or Similar Party	[c] Description of Investment including Maturity Date, Rate of Interest, Collateral, Par or Maturity Value	[d] Cost	[e] Current Value
	AQR INTERNATIONAL SMALL CAP EQUITY TRUST	PARTNERSHIP/JOINT VENTURE INTERESTS	\$ 23,000,000	\$ 29,736,403
	CENTERSQUARE EB GLOBAL REAL ESTATE SECURITIES	PARTNERSHIP/JOINT VENTURE INTERESTS	15,238,227	19,069,748
	UBS TRUMBULL PROPERTY FUND (TPF)	PARTNERSHIP/JOINT VENTURE INTERESTS	18,743,931	26,687,855
	SSGA RUSSELL 2000 INDEX NL FUND	COMMON/COLLECTIVE TRUSTS	36,284,590	38,106,325
	SSGA MSCI ACWI EX USA NON-LENDING FUND	COMMON/COLLECTIVE TRUSTS	129,688,900	135,946,656
	SSGA S&P 500 FLAGSHIP NON-LENDING FUND	COMMON/COLLECTIVE TRUSTS	129,316,517	159,540,695
	SSGA U.S. AGGREGATE BOND INDEX NON-LENDI	COMMON/COLLECTIVE TRUSTS	80,044,899	85,412,133
*	JPMORGAN 100% US TREAS SEC MMKT FUND AGE	MONEY MARKET FUND	8,327,511	8,327,511
	WESTERN ASSET FUND INC CORE PLUS BOND IS	REGISTERED INVESTMENT COMPANIES	78,132,197	86,324,934
	OTHER ASSETS	RIGHTS, WARRANTS AND SUBSCRIPTIONS	4,460	88,635
Total Plan investments at fair value				<u>\$ 589,240,895</u>

* - Denotes party-in-interest

ROWAN PENSION PLAN
EIN: 75-0759420 Plan Number: 001

Form 5500 Schedule H, Line 4j
Schedule of Reportable Transactions
For the Year Ended December 31, 2014

The following pages represent the Plan's reportable transactions for the year ended December 31, 2014.

		BASED ON MARKET VALUE OF		542,449,446	5% VALUE OF	27,122,472
IDENTITY OF PARTY INVOLVED	DESCRIPTION OF ASSET	PURCHASE PRICE SELLING PRICE	EXPENSES	COST OF ASSET	CURRENT VALUE	NET GAIN OR (LOSS)
092998319 BROKER 0800102	BLACKSTONE PARTNERS FUND ? BPIF NON TAXABLE LP MEMO					
43,700,342	01/30/14 SELL 13	1.1230	0	43,700,342	49,073,500	5,373,158
928989326 BROKER 0800094	JPMORGAN 100% US TREAS SEC MMKT FUND AGENCY SHARES MONTHLY VARIABLE 12/31/2049 MASTER NOTES					
49,073,500	01/30/14 BUY 10	100.0000	0	49,073,500	49,073,500	0
928989326 BROKER 0800094	JPMORGAN 100% US TREAS SEC MMKT FUND AGENCY SHARES MONTHLY VARIABLE 12/31/2049 MASTER NOTES					
49,073,500	01/31/14 SELL 12	100.0000	0	49,073,500	49,073,500	0
928989326 BROKER 0800094	JPMORGAN 100% US TREAS SEC MMKT FUND AGENCY SHARES MONTHLY VARIABLE 12/31/2049 MASTER NOTES					
49,073,500	01/31/14 BUY 2918	100.0000	0	49,073,500	49,073,500	0
928989326 BROKER 0800094	JPMORGAN 100% US TREAS SEC MMKT FUND AGENCY SHARES MONTHLY VARIABLE 12/31/2049 MASTER NOTES					
36,812,206	02/03/14 SELL 2930	100.0000	0	36,812,206	36,812,206	0

		BASED ON MARKET VALUE OF		542,449,446	5% VALUE OF	27,122,472
IDENTITY OF PARTY INVOLVED	DESCRIPTION OF ASSET	PURCHASE PRICE SELLING PRICE	EXPENSES	COST OF ASSET	CURRENT VALUE	NET GAIN OR (LOSS)
092998319 BLACKSTONE PARTNERS FUND ? BPIF NON TAXABLE LP						
BROKER 0800102 MEMO						
43,700,342	01/30/14 S SELL 13	1.1230	0	43,700,342	49,073,500	5,373,158
2,299,658	07/28/14 S SELL 17	1.1390	0	2,299,658	2,619,233	319,575
-----			-----	-----	-----	-----
46,000,000	2 TOTAL SELLS		0	46,000,000	51,692,733	5,692,733
-----			-----	-----	-----	-----
46,000,000	SECURITY TOTAL		0	46,000,000	51,692,733	5,692,733
199990581 COMMITMENT TO PURCHASE FUND						
BROKER 0800102 MEMO						
8,000,000	02/03/14 B BUY 178	1.0000	0	8,000,000	8,000,000	0
8,000,000	02/03/14 S SELL 183	1.0000	0	8,000,000	8,000,000	0
1,443,000	04/15/14 B BUY 78	1.0000	0	1,443,000	1,443,000	0
2,800,000	04/15/14 B BUY 191	1.0000	0	2,800,000	2,800,000	0
2,800,000	04/15/14 S SELL 192	1.0000	0	2,800,000	2,800,000	0
1,443,000	05/01/14 S SELL 81	1.0000	0	1,443,000	1,443,000	0
4,200,000	09/12/14 B BUY 202	1.0000	0	4,200,000	4,200,000	0
4,200,000	09/12/14 S SELL 205	1.0000	0	4,200,000	4,200,000	0
-----			-----	-----	-----	-----
16,443,000	4 TOTAL BUYS		0	16,443,000	16,443,000	0
16,443,000	4 TOTAL SELLS		0	16,443,000	16,443,000	0
-----			-----	-----	-----	-----
32,886,000	SECURITY TOTAL		0	32,886,000	32,886,000	0
928989326 JPMORGAN 100% US TREAS SEC MMKT FUND AGENCY SHARES						
MONTHLY VARIABLE 12/31/2049						
BROKER 0800094 MASTER NOTES						
2,466,970	01/02/14 S SELL 2895	100.0000	0	2,466,970	2,466,970	0
2,249,735	01/02/14 S SELL 4595253	100.0000	0	2,249,735	2,249,735	0
43	01/03/14 B BUY 10848	100.0000	0	43	43	0
218	01/03/14 B BUY 11948	100.0000	0	218	218	0
358	01/06/14 S SELL 2898	100.0000	0	358	358	0
5,555	01/10/14 S SELL 2902	100.0000	0	5,555	5,555	0
2,586	01/10/14 B BUY 4595261	100.0000	0	2,586	2,586	0
6,108,000	01/15/14 B BUY 2903	100.0000	0	6,108,000	6,108,000	0
8,364	01/15/14 B BUY 4595271	100.0000	0	8,364	8,364	0
1,266	01/17/14 B BUY 4595499	100.0000	0	1,266	1,266	0
4,030	01/21/14 B BUY 4595501	100.0000	0	4,030	4,030	0
4,370	01/22/14 B BUY 2909	100.0000	0	4,370	4,370	0
1,950	01/23/14 B BUY 4595505	100.0000	0	1,950	1,950	0
1	01/27/14 B BUY 4595508	100.0000	0	1	1	0
3,889	01/29/14 B BUY 2912	100.0000	0	3,889	3,889	0
49,073,500	01/30/14 B BUY 10	100.0000	0	49,073,500	49,073,500	0
17,493	01/30/14 S SELL 2914	100.0000	0	17,493	17,493	0
49,073,500	01/31/14 S SELL 12	100.0000	0	49,073,500	49,073,500	0
49,073,500	01/31/14 B BUY 2918	100.0000	0	49,073,500	49,073,500	0

		BASED ON MARKET VALUE OF		542,449,446	5% VALUE OF	27,122,472
IDENTITY OF PARTY INVOLVED	DESCRIPTION OF ASSET	PURCHASE PRICE SELLING PRICE	EXPENSES	COST OF ASSET	CURRENT VALUE	NET GAIN OR (LOSS)
	0 01/31/14 S SELL 11952	100.0000	0	0	0	0
	6,058 01/31/14 B BUY 4595515	100.0000	0	6,058	6,058	0
16,750,000	02/03/14 B BUY 14	100.0000	0	16,750,000	16,750,000	0
9,750,000	02/03/14 B BUY 15	100.0000	0	9,750,000	9,750,000	0
36,812,206	02/03/14 S SELL 2930	100.0000	0	36,812,206	36,812,206	0
2,479	02/03/14 B BUY 4595516	100.0000	0	2,479	2,479	0
19,345	02/04/14 S SELL 2935	100.0000	0	19,345	19,345	0
9,750,000	02/05/14 S SELL 16	100.0000	0	9,750,000	9,750,000	0
7,016,342	02/05/14 S SELL 2945	100.0000	0	7,016,342	7,016,342	0
1,766	02/07/14 B BUY 2947	100.0000	0	1,766	1,766	0
591	02/10/14 S SELL 2949	100.0000	0	591	591	0
16,750,000	02/19/14 S SELL 15	100.0000	0	16,750,000	16,750,000	0
1,004	02/25/14 B BUY 2951	100.0000	0	1,004	1,004	0
0	02/25/14 B BUY 4595520	100.0000	0	0	0	0
21,252	02/28/14 S SELL 2953	100.0000	0	21,252	21,252	0
2,215,075	03/03/14 S SELL 2960	100.0000	0	2,215,075	2,215,075	0
61,735	03/04/14 S SELL 2963	100.0000	0	61,735	61,735	0
5,216	03/05/14 S SELL 2966	100.0000	0	5,216	5,216	0
2,073	03/06/14 S SELL 2969	100.0000	0	2,073	2,073	0
3,031	03/07/14 B BUY 2974	100.0000	0	3,031	3,031	0
26,336	03/10/14 S SELL 2976	100.0000	0	26,336	26,336	0
924	03/11/14 B BUY 2978	100.0000	0	924	924	0
1,038	03/25/14 B BUY 2982	100.0000	0	1,038	1,038	0
1	03/26/14 B BUY 4595526	100.0000	0	1	1	0
3,695	03/28/14 B BUY 2985	100.0000	0	3,695	3,695	0
33,622	03/31/14 S SELL 2988	100.0000	0	33,622	33,622	0
2,237,913	04/01/14 S SELL 2995	100.0000	0	2,237,913	2,237,913	0
1,069	04/03/14 B BUY 2998	100.0000	0	1,069	1,069	0
29,208	04/09/14 S SELL 3001	100.0000	0	29,208	29,208	0
1,062	04/14/14 B BUY 3002	100.0000	0	1,062	1,062	0
5,800,000	04/15/14 B BUY 20	100.0000	0	5,800,000	5,800,000	0
5,800,000	04/16/14 S SELL 21	100.0000	0	5,800,000	5,800,000	0
1	04/21/14 B BUY 4595533	100.0000	0	1	1	0
1,064	04/23/14 B BUY 3009	100.0000	0	1,064	1,064	0
4,078	04/30/14 B BUY 3014	100.0000	0	4,078	4,078	0
2,269,069	05/01/14 S SELL 3022	100.0000	0	2,269,069	2,269,069	0
2,512	05/05/14 B BUY 3025	100.0000	0	2,512	2,512	0
38,417	05/15/14 S SELL 3029	100.0000	0	38,417	38,417	0
1	05/16/14 B BUY 3031	100.0000	0	1	1	0
1,974	05/28/14 B BUY 3036	100.0000	0	1,974	1,974	0
2	05/28/14 B BUY 4595538	100.0000	0	2	2	0
2,363,469	06/02/14 S SELL 3045	100.0000	0	2,363,469	2,363,469	0
67,152	06/03/14 S SELL 3048	100.0000	0	67,152	67,152	0
36,284	06/04/14 B BUY 3052	100.0000	0	36,284	36,284	0
2,358	06/04/14 S SELL 10854	100.0000	0	2,358	2,358	0
7,188	06/04/14 S SELL 11954	100.0000	0	7,188	7,188	0
26,737	06/04/14 S SELL 4595541	100.0000	0	26,737	26,737	0

		BASED ON MARKET VALUE OF		542,449,446	5% VALUE OF	27,122,472
IDENTITY OF PARTY INVOLVED	DESCRIPTION OF ASSET	PURCHASE PRICE SELLING PRICE	EXPENSES	COST OF ASSET	CURRENT VALUE	NET GAIN OR (LOSS)
	109 06/05/14 B BUY 3054	100.0000	0	109	109	0
	800 06/17/14 S SELL 3056	100.0000	0	800	800	0
	1,012 06/26/14 B BUY 3058	100.0000	0	1,012	1,012	0
	2 06/26/14 B BUY 4595545	100.0000	0	2	2	0
	3,931 06/27/14 B BUY 3061	100.0000	0	3,931	3,931	0
	55,535 06/30/14 S SELL 3065	100.0000	0	55,535	55,535	0
	2,598,913 07/01/14 S SELL 3072	100.0000	0	2,598,913	2,598,913	0
	21,130 07/02/14 S SELL 3074	100.0000	0	21,130	21,130	0
	316 07/03/14 B BUY 3076	100.0000	0	316	316	0
	23,885 07/08/14 S SELL 3079	100.0000	0	23,885	23,885	0
	166 07/09/14 B BUY 3082	100.0000	0	166	166	0
	35,670 07/10/14 S SELL 3084	100.0000	0	35,670	35,670	0
	107 07/11/14 S SELL 3086	100.0000	0	107	107	0
	8,128,000 07/15/14 B BUY 3090	100.0000	0	8,128,000	8,128,000	0
	24,932 07/16/14 S SELL 3094	100.0000	0	24,932	24,932	0
	17,053 07/18/14 S SELL 3097	100.0000	0	17,053	17,053	0
	1,245 07/23/14 B BUY 3099	100.0000	0	1,245	1,245	0
	2,619,613 07/28/14 B BUY 14	100.0000	0	2,619,613	2,619,613	0
	1 07/28/14 B BUY 4595550	100.0000	0	1	1	0
	4,386 07/30/14 B BUY 3102	100.0000	0	4,386	4,386	0
	2,619,613 07/31/14 S SELL 16	100.0000	0	2,619,613	2,619,613	0
	2,602,488 07/31/14 B BUY 3105	100.0000	0	2,602,488	2,602,488	0
	2,727,832 08/01/14 S SELL 3112	100.0000	0	2,727,832	2,727,832	0
	85,691 08/04/14 S SELL 3118	100.0000	0	85,691	85,691	0
	2,261 08/05/14 B BUY 3121	100.0000	0	2,261	2,261	0
	2,124 08/06/14 S SELL 3124	100.0000	0	2,124	2,124	0
	18,203 08/08/14 S SELL 3126	100.0000	0	18,203	18,203	0
	63,994 08/11/14 S SELL 3130	100.0000	0	63,994	63,994	0
	4,658 08/13/14 S SELL 3133	100.0000	0	4,658	4,658	0
	11,926 08/18/14 S SELL 3137	100.0000	0	11,926	11,926	0
	1,540 08/26/14 B BUY 3140	100.0000	0	1,540	1,540	0
	12 08/26/14 B BUY 4595555	100.0000	0	12	12	0
	2,500 08/27/14 S SELL 3142	100.0000	0	2,500	2,500	0
	11 08/27/14 S SELL 4595556	100.0000	0	11	11	0
	4,307 08/28/14 B BUY 3145	100.0000	0	4,307	4,307	0
	2,685,091 09/02/14 S SELL 3152	100.0000	0	2,685,091	2,685,091	0
	168 09/03/14 B BUY 3154	100.0000	0	168	168	0
	3,323 09/04/14 B BUY 3157	100.0000	0	3,323	3,323	0
	3,670 09/08/14 B BUY 3159	100.0000	0	3,670	3,670	0
	4,499 09/09/14 S SELL 3161	100.0000	0	4,499	4,499	0
	4,200,000 09/12/14 B BUY 16	100.0000	0	4,200,000	4,200,000	0
	9,027,000 09/12/14 B BUY 3166	100.0000	0	9,027,000	9,027,000	0
	4,200,000 09/16/14 S SELL 18	100.0000	0	4,200,000	4,200,000	0
	1,620 09/16/14 B BUY 3169	100.0000	0	1,620	1,620	0
	8,229 09/19/14 S SELL 3171	100.0000	0	8,229	8,229	0
	373 09/24/14 S SELL 3173	100.0000	0	373	373	0
	12 09/24/14 B BUY 4595561	100.0000	0	12	12	0

				BASED ON MARKET VALUE OF		542,449,446	5% VALUE OF	27,122,472
DESCRIPTION OF ASSET				PURCHASE PRICE	EXPENSES	COST OF ASSET	CURRENT VALUE	NET GAIN
IDENTITY OF PARTY INVOLVED				SELLING PRICE				OR (LOSS)
6,355	09/26/14	B BUY	3176	100.0000	0	6,355	6,355	0
10	09/29/14	S SELL	4595563	100.0000	0	10	10	0
16,127	09/30/14	S SELL	3178	100.0000	0	16,127	16,127	0
2,473,905	10/01/14	S SELL	3186	100.0000	0	2,473,905	2,473,905	0
15,278	10/02/14	S SELL	3190	100.0000	0	15,278	15,278	0
43,800	10/03/14	S SELL	3192	100.0000	0	43,800	43,800	0
53,411	10/06/14	S SELL	3195	100.0000	0	53,411	53,411	0
15,203	10/07/14	S SELL	3198	100.0000	0	15,203	15,203	0
894	10/08/14	B BUY	3200	100.0000	0	894	894	0
28,446	10/09/14	S SELL	3203	100.0000	0	28,446	28,446	0
1,426,943	10/14/14	S SELL	3211	100.0000	0	1,426,943	1,426,943	0
52,159	10/16/14	S SELL	3215	100.0000	0	52,159	52,159	0
687	10/23/14	B BUY	3217	100.0000	0	687	687	0
687	10/24/14	S SELL	3219	100.0000	0	687	687	0
3	10/24/14	B BUY	4595567	100.0000	0	3	3	0
5,662	10/27/14	B BUY	3222	100.0000	0	5,662	5,662	0
17,186	10/30/14	S SELL	3227	100.0000	0	17,186	17,186	0
2,828,587	11/03/14	S SELL	3238	100.0000	0	2,828,587	2,828,587	0
18,715	11/04/14	S SELL	3242	100.0000	0	18,715	18,715	0
1,814	11/05/14	B BUY	3244	100.0000	0	1,814	1,814	0
131	11/06/14	S SELL	3246	100.0000	0	131	131	0
31,338	11/07/14	S SELL	3248	100.0000	0	31,338	31,338	0
23,273	11/17/14	S SELL	3252	100.0000	0	23,273	23,273	0
919	11/25/14	B BUY	3254	100.0000	0	919	919	0
3,035,385	12/01/14	S SELL	3262	100.0000	0	3,035,385	3,035,385	0
3	12/01/14	B BUY	4595573	100.0000	0	3	3	0
31,610	12/02/14	S SELL	3265	100.0000	0	31,610	31,610	0
33,469	12/03/14	S SELL	3267	100.0000	0	33,469	33,469	0
11,696	12/04/14	S SELL	3270	100.0000	0	11,696	11,696	0
96,013	12/05/14	S SELL	3273	100.0000	0	96,013	96,013	0
96	12/08/14	S SELL	3275	100.0000	0	96	96	0
55,573	12/09/14	S SELL	3281	100.0000	0	55,573	55,573	0
33,796	12/10/14	S SELL	3283	100.0000	0	33,796	33,796	0
17,563	12/12/14	S SELL	3285	100.0000	0	17,563	17,563	0
72,566	12/15/14	S SELL	3287	100.0000	0	72,566	72,566	0
44,654	12/17/14	S SELL	3289	100.0000	0	44,654	44,654	0
810	12/23/14	B BUY	3293	100.0000	0	810	810	0
1,620	12/24/14	B BUY	3295	100.0000	0	1,620	1,620	0
13	12/24/14	B BUY	4595580	100.0000	0	13	13	0
8	12/26/14	S SELL	4595581	100.0000	0	8	8	0
14,339	12/29/14	S SELL	3299	100.0000	0	14,339	14,339	0
16,272	12/30/14	S SELL	3302	100.0000	0	16,272	16,272	0
3,650	12/31/14	B BUY	3307	100.0000	0	3,650	3,650	0
-----						-----	-----	-----
163,277,372	71	TOTAL BUYS		0		163,277,372	163,277,372	0
165,089,923	85	TOTAL SELLS		0		165,089,923	165,089,923	0
-----						-----	-----	-----

DESCRIPTION OF ASSET IDENTITY OF PARTY INVOLVED		BASED ON MARKET VALUE OF PURCHASE PRICE SELLING PRICE	EXPENSES	542,449,446 COST OF ASSET	5% VALUE OF CURRENT VALUE	27,122,472 NET GAIN OR (LOSS)
328,367,295	SECURITY TOTAL		0	328,367,295	328,367,295	0

		BASED ON MARKET VALUE OF		542,449,446	5% VALUE OF	27,122,472
IDENTITY OF PARTY INVOLVED	DESCRIPTION OF ASSET	PURCHASE PRICE SELLING PRICE	EXPENSES	COST OF ASSET	CURRENT VALUE	NET GAIN OR (LOSS)
BROKER 0800094	MASTER NOTES					
-----	-----					
928989326	JPMORGAN 100% US TREAS SEC MMKT FUND AGENCY SHARES					
	MONTHLY VARIABLE 12/31/2049					
49,073,500	01/30/14 BUY 10	100.0000	0	49,073,500	49,073,500	0
49,073,500	01/31/14 SELL 12	100.0000	0	49,073,500	49,073,500	0
49,073,500	01/31/14 BUY 2918	100.0000	0	49,073,500	49,073,500	0
36,812,206	02/03/14 SELL 2930	100.0000	0	36,812,206	36,812,206	0
2,466,970	01/02/14 SELL 2895	100.0000	0	2,466,970	2,466,970	0
2,249,735	01/02/14 SELL 4595253	100.0000	0	2,249,735	2,249,735	0
43	01/03/14 BUY 10848	100.0000	0	43	43	0
218	01/03/14 BUY 11948	100.0000	0	218	218	0
358	01/06/14 SELL 2898	100.0000	0	358	358	0
5,555	01/10/14 SELL 2902	100.0000	0	5,555	5,555	0
2,586	01/10/14 BUY 4595261	100.0000	0	2,586	2,586	0
6,108,000	01/15/14 BUY 2903	100.0000	0	6,108,000	6,108,000	0
8,364	01/15/14 BUY 4595271	100.0000	0	8,364	8,364	0
1,266	01/17/14 BUY 4595499	100.0000	0	1,266	1,266	0
4,030	01/21/14 BUY 4595501	100.0000	0	4,030	4,030	0
4,370	01/22/14 BUY 2909	100.0000	0	4,370	4,370	0
1,950	01/23/14 BUY 4595505	100.0000	0	1,950	1,950	0
1	01/27/14 BUY 4595508	100.0000	0	1	1	0
3,889	01/29/14 BUY 2912	100.0000	0	3,889	3,889	0
17,493	01/30/14 SELL 2914	100.0000	0	17,493	17,493	0
0	01/31/14 SELL 11952	100.0000	0	0	0	0
6,058	01/31/14 BUY 4595515	100.0000	0	6,058	6,058	0
16,750,000	02/03/14 BUY 14	100.0000	0	16,750,000	16,750,000	0
9,750,000	02/03/14 BUY 15	100.0000	0	9,750,000	9,750,000	0
2,479	02/03/14 BUY 4595516	100.0000	0	2,479	2,479	0
19,345	02/04/14 SELL 2935	100.0000	0	19,345	19,345	0
9,750,000	02/05/14 SELL 16	100.0000	0	9,750,000	9,750,000	0
7,016,342	02/05/14 SELL 2945	100.0000	0	7,016,342	7,016,342	0
1,766	02/07/14 BUY 2947	100.0000	0	1,766	1,766	0
591	02/10/14 SELL 2949	100.0000	0	591	591	0
16,750,000	02/19/14 SELL 15	100.0000	0	16,750,000	16,750,000	0
1,004	02/25/14 BUY 2951	100.0000	0	1,004	1,004	0
0	02/25/14 BUY 4595520	100.0000	0	0	0	0
21,252	02/28/14 SELL 2953	100.0000	0	21,252	21,252	0
2,215,075	03/03/14 SELL 2960	100.0000	0	2,215,075	2,215,075	0
61,735	03/04/14 SELL 2963	100.0000	0	61,735	61,735	0
5,216	03/05/14 SELL 2966	100.0000	0	5,216	5,216	0
2,073	03/06/14 SELL 2969	100.0000	0	2,073	2,073	0
3,031	03/07/14 BUY 2974	100.0000	0	3,031	3,031	0
26,336	03/10/14 SELL 2976	100.0000	0	26,336	26,336	0
924	03/11/14 BUY 2978	100.0000	0	924	924	0
1,038	03/25/14 BUY 2982	100.0000	0	1,038	1,038	0

IDENTITY OF PARTY INVOLVED		PURCHASE PRICE		EXPENSES	COST OF ASSET	CURRENT VALUE	NET GAIN OR (LOSS)
DESCRIPTION OF ASSET		SELLING PRICE					
		BASED ON MARKET VALUE OF			542,449,446	5% VALUE OF	27,122,472
1	03/26/14 BUY	4595526	100.0000	0	1	1	0
3,695	03/28/14 BUY	2985	100.0000	0	3,695	3,695	0
33,622	03/31/14 SELL	2988	100.0000	0	33,622	33,622	0
2,237,913	04/01/14 SELL	2995	100.0000	0	2,237,913	2,237,913	0
1,069	04/03/14 BUY	2998	100.0000	0	1,069	1,069	0
29,208	04/09/14 SELL	3001	100.0000	0	29,208	29,208	0
1,062	04/14/14 BUY	3002	100.0000	0	1,062	1,062	0
5,800,000	04/15/14 BUY	20	100.0000	0	5,800,000	5,800,000	0
5,800,000	04/16/14 SELL	21	100.0000	0	5,800,000	5,800,000	0
1	04/21/14 BUY	4595533	100.0000	0	1	1	0
1,064	04/23/14 BUY	3009	100.0000	0	1,064	1,064	0
4,078	04/30/14 BUY	3014	100.0000	0	4,078	4,078	0
2,269,069	05/01/14 SELL	3022	100.0000	0	2,269,069	2,269,069	0
2,512	05/05/14 BUY	3025	100.0000	0	2,512	2,512	0
38,417	05/15/14 SELL	3029	100.0000	0	38,417	38,417	0
1	05/16/14 BUY	3031	100.0000	0	1	1	0
1,974	05/28/14 BUY	3036	100.0000	0	1,974	1,974	0
2	05/28/14 BUY	4595538	100.0000	0	2	2	0
2,363,469	06/02/14 SELL	3045	100.0000	0	2,363,469	2,363,469	0
67,152	06/03/14 SELL	3048	100.0000	0	67,152	67,152	0
36,284	06/04/14 BUY	3052	100.0000	0	36,284	36,284	0
2,358	06/04/14 SELL	10854	100.0000	0	2,358	2,358	0
7,188	06/04/14 SELL	11954	100.0000	0	7,188	7,188	0
26,737	06/04/14 SELL	4595541	100.0000	0	26,737	26,737	0
109	06/05/14 BUY	3054	100.0000	0	109	109	0
800	06/17/14 SELL	3056	100.0000	0	800	800	0
1,012	06/26/14 BUY	3058	100.0000	0	1,012	1,012	0
2	06/26/14 BUY	4595545	100.0000	0	2	2	0
3,931	06/27/14 BUY	3061	100.0000	0	3,931	3,931	0
55,535	06/30/14 SELL	3065	100.0000	0	55,535	55,535	0
2,598,913	07/01/14 SELL	3072	100.0000	0	2,598,913	2,598,913	0
21,130	07/02/14 SELL	3074	100.0000	0	21,130	21,130	0
316	07/03/14 BUY	3076	100.0000	0	316	316	0
23,885	07/08/14 SELL	3079	100.0000	0	23,885	23,885	0
166	07/09/14 BUY	3082	100.0000	0	166	166	0
35,670	07/10/14 SELL	3084	100.0000	0	35,670	35,670	0
107	07/11/14 SELL	3086	100.0000	0	107	107	0
8,128,000	07/15/14 BUY	3090	100.0000	0	8,128,000	8,128,000	0
24,932	07/16/14 SELL	3094	100.0000	0	24,932	24,932	0
17,053	07/18/14 SELL	3097	100.0000	0	17,053	17,053	0
1,245	07/23/14 BUY	3099	100.0000	0	1,245	1,245	0
2,619,613	07/28/14 BUY	14	100.0000	0	2,619,613	2,619,613	0
1	07/28/14 BUY	4595550	100.0000	0	1	1	0
4,386	07/30/14 BUY	3102	100.0000	0	4,386	4,386	0
2,619,613	07/31/14 SELL	16	100.0000	0	2,619,613	2,619,613	0
2,602,488	07/31/14 BUY	3105	100.0000	0	2,602,488	2,602,488	0
2,727,832	08/01/14 SELL	3112	100.0000	0	2,727,832	2,727,832	0

				BASED ON MARKET VALUE OF		542,449,446	5% VALUE OF	27,122,472
IDENTITY OF PARTY INVOLVED DESCRIPTION OF ASSET				PURCHASE PRICE SELLING PRICE	EXPENSES	COST OF ASSET	CURRENT VALUE	NET GAIN OR (LOSS)
85,691	08/04/14	SELL	3118	100.0000	0	85,691	85,691	0
2,261	08/05/14	BUY	3121	100.0000	0	2,261	2,261	0
2,124	08/06/14	SELL	3124	100.0000	0	2,124	2,124	0
18,203	08/08/14	SELL	3126	100.0000	0	18,203	18,203	0
63,994	08/11/14	SELL	3130	100.0000	0	63,994	63,994	0
4,658	08/13/14	SELL	3133	100.0000	0	4,658	4,658	0
11,926	08/18/14	SELL	3137	100.0000	0	11,926	11,926	0
1,540	08/26/14	BUY	3140	100.0000	0	1,540	1,540	0
12	08/26/14	BUY	4595555	100.0000	0	12	12	0
2,500	08/27/14	SELL	3142	100.0000	0	2,500	2,500	0
11	08/27/14	SELL	4595556	100.0000	0	11	11	0
4,307	08/28/14	BUY	3145	100.0000	0	4,307	4,307	0
2,685,091	09/02/14	SELL	3152	100.0000	0	2,685,091	2,685,091	0
168	09/03/14	BUY	3154	100.0000	0	168	168	0
3,323	09/04/14	BUY	3157	100.0000	0	3,323	3,323	0
3,670	09/08/14	BUY	3159	100.0000	0	3,670	3,670	0
4,499	09/09/14	SELL	3161	100.0000	0	4,499	4,499	0
4,200,000	09/12/14	BUY	16	100.0000	0	4,200,000	4,200,000	0
9,027,000	09/12/14	BUY	3166	100.0000	0	9,027,000	9,027,000	0
4,200,000	09/16/14	SELL	18	100.0000	0	4,200,000	4,200,000	0
1,620	09/16/14	BUY	3169	100.0000	0	1,620	1,620	0
8,229	09/19/14	SELL	3171	100.0000	0	8,229	8,229	0
373	09/24/14	SELL	3173	100.0000	0	373	373	0
12	09/24/14	BUY	4595561	100.0000	0	12	12	0
6,355	09/26/14	BUY	3176	100.0000	0	6,355	6,355	0
10	09/29/14	SELL	4595563	100.0000	0	10	10	0
16,127	09/30/14	SELL	3178	100.0000	0	16,127	16,127	0
2,473,905	10/01/14	SELL	3186	100.0000	0	2,473,905	2,473,905	0
15,278	10/02/14	SELL	3190	100.0000	0	15,278	15,278	0
43,800	10/03/14	SELL	3192	100.0000	0	43,800	43,800	0
53,411	10/06/14	SELL	3195	100.0000	0	53,411	53,411	0
15,203	10/07/14	SELL	3198	100.0000	0	15,203	15,203	0
894	10/08/14	BUY	3200	100.0000	0	894	894	0
28,446	10/09/14	SELL	3203	100.0000	0	28,446	28,446	0
1,426,943	10/14/14	SELL	3211	100.0000	0	1,426,943	1,426,943	0
52,159	10/16/14	SELL	3215	100.0000	0	52,159	52,159	0
687	10/23/14	BUY	3217	100.0000	0	687	687	0
687	10/24/14	SELL	3219	100.0000	0	687	687	0
3	10/24/14	BUY	4595567	100.0000	0	3	3	0
5,662	10/27/14	BUY	3222	100.0000	0	5,662	5,662	0
17,186	10/30/14	SELL	3227	100.0000	0	17,186	17,186	0
2,828,587	11/03/14	SELL	3238	100.0000	0	2,828,587	2,828,587	0
18,715	11/04/14	SELL	3242	100.0000	0	18,715	18,715	0
1,814	11/05/14	BUY	3244	100.0000	0	1,814	1,814	0
131	11/06/14	SELL	3246	100.0000	0	131	131	0
31,338	11/07/14	SELL	3248	100.0000	0	31,338	31,338	0
23,273	11/17/14	SELL	3252	100.0000	0	23,273	23,273	0

IDENTITY OF PARTY INVOLVED		DESCRIPTION OF ASSET		PURCHASE PRICE SELLING PRICE		EXPENSES	COST OF ASSET	CURRENT VALUE	NET GAIN OR (LOSS)
				BASED ON MARKET VALUE OF			542,449,446	5% VALUE OF	27,122,472
919	11/25/14	BUY	3254	100.0000	0	919	919	919	0
3,035,385	12/01/14	SELL	3262	100.0000	0	3,035,385	3,035,385	3,035,385	0
3	12/01/14	BUY	4595573	100.0000	0	3	3	3	0
31,610	12/02/14	SELL	3265	100.0000	0	31,610	31,610	31,610	0
33,469	12/03/14	SELL	3267	100.0000	0	33,469	33,469	33,469	0
11,696	12/04/14	SELL	3270	100.0000	0	11,696	11,696	11,696	0
96,013	12/05/14	SELL	3273	100.0000	0	96,013	96,013	96,013	0
96	12/08/14	SELL	3275	100.0000	0	96	96	96	0
55,573	12/09/14	SELL	3281	100.0000	0	55,573	55,573	55,573	0
33,796	12/10/14	SELL	3283	100.0000	0	33,796	33,796	33,796	0
17,563	12/12/14	SELL	3285	100.0000	0	17,563	17,563	17,563	0
72,566	12/15/14	SELL	3287	100.0000	0	72,566	72,566	72,566	0
44,654	12/17/14	SELL	3289	100.0000	0	44,654	44,654	44,654	0
810	12/23/14	BUY	3293	100.0000	0	810	810	810	0
1,620	12/24/14	BUY	3295	100.0000	0	1,620	1,620	1,620	0
13	12/24/14	BUY	4595580	100.0000	0	13	13	13	0
8	12/26/14	SELL	4595581	100.0000	0	8	8	8	0
14,339	12/29/14	SELL	3299	100.0000	0	14,339	14,339	14,339	0
16,272	12/30/14	SELL	3302	100.0000	0	16,272	16,272	16,272	0
3,650	12/31/14	BUY	3307	100.0000	0	3,650	3,650	3,650	0
328,367,295	BROKER TOTAL				0	328,367,295	328,367,295	328,367,295	0

IDENTITY OF PARTY INVOLVED DESCRIPTION OF ASSET		PURCHASE PRICE SELLING PRICE		EXPENSES	COST OF ASSET	CURRENT VALUE	NET GAIN OR (LOSS)
BROKER 0800102 MEMO -----							
092998319 BLACKSTONE PARTNERS FUND ? BPIF NON TAXABLE LP							
43,700,342	01/30/14 SELL	13	1.1230	0	43,700,342	49,073,500	5,373,158
2,299,658	07/28/14 SELL	17	1.1390	0	2,299,658	2,619,233	319,575
199990581 COMMITMENT TO PURCHASE FUND							
8,000,000	02/03/14 BUY	178	1.0000	0	8,000,000	8,000,000	0
8,000,000	02/03/14 SELL	183	1.0000	0	8,000,000	8,000,000	0
1,443,000	04/15/14 BUY	78	1.0000	0	1,443,000	1,443,000	0
2,800,000	04/15/14 BUY	191	1.0000	0	2,800,000	2,800,000	0
2,800,000	04/15/14 SELL	192	1.0000	0	2,800,000	2,800,000	0
1,443,000	05/01/14 SELL	81	1.0000	0	1,443,000	1,443,000	0
4,200,000	09/12/14 BUY	202	1.0000	0	4,200,000	4,200,000	0
4,200,000	09/12/14 SELL	205	1.0000	0	4,200,000	4,200,000	0
74348T102 PROSPECT CAPITAL CORP COMMON STOCK USD 0.001							
0	12/15/14 SELL	4595575	29.4000	0	1	3	2
783999428 RUSSELL 2000 INDEX NL FUND							
1	03/11/14 SELL	5	78.2247	0	68	70	2
83	07/14/14 SELL	7	76.8437	0	6,299	6,356	57
82	09/05/14 SELL	11	77.2471	0	6,231	6,320	89
80	12/04/14 SELL	17	77.7647	0	6,105	6,234	129
G91993694 UBS TRUMBULL PROPERTY FUND (TPF)							
19	10/01/14 BUY	219	9,210.6159	0	179,018	179,018	0
0	10/01/14 INT	220	.0000	0	0	0	0
M96995697 URDANG EB GLOBAL REAL ESTATE SECURITIES FUND OF THE BANK OF NEW YORK MELLON							
1,784	03/03/14 SELL	76	16.1700	0	25,731	28,854	3,123
87,033	05/01/14 BUY	80	16.5800	0	1,443,000	1,443,000	0
1,687	06/02/14 SELL	82	17.3000	0	24,624	29,179	4,555
1,883	09/02/14 SELL	84	17.8600	0	27,494	33,634	6,141
1,910	11/13/14 SELL	86	18.0800	0	27,892	34,542	6,650
957663669 WESTERN ASSET CORE PLUS BOND FUND OPEN-END FUND USD							
18,154	01/31/14 BUY	181	11.3400	0	205,869	205,869	0
0	01/31/14 DIVD	182	.0000	0	0	0	0
703,606	02/03/14 BUY	184	11.3700	0	8,000,000	8,000,000	0
19,060	02/28/14 BUY	185	11.4100	0	217,479	217,479	0
0	02/28/14 DIVD	186	.0000	0	0	0	0
19,784	03/31/14 BUY	187	11.4000	0	225,542	225,542	0
0	03/31/14 DIVD	188	.0000	0	0	0	0

IDENTITY OF PARTY INVOLVED		DESCRIPTION OF ASSET		PURCHASE PRICE SELLING PRICE		EXPENSES	COST OF ASSET	CURRENT VALUE	NET GAIN OR (LOSS)
				BASED ON MARKET VALUE OF			542,449,446	5% VALUE OF	27,122,472
244,115	04/15/14	BUY	190	11.4700		0	2,800,000	2,800,000	0
20,841	04/30/14	BUY	193	11.4800		0	239,256	239,256	0
0	04/30/14	DIVD	194	.0000		0	0	0	0
22,225	05/30/14	BUY	195	11.6100		0	258,034	258,034	0
0	05/30/14	DIVD	196	.0000		0	0	0	0
19,368	06/30/14	BUY	197	11.6200		0	225,058	225,058	0
0	06/30/14	DIVD	198	.0000		0	0	0	0
21,494	07/31/14	BUY	199	11.5800		0	248,905	248,905	0
0	07/31/14	DIVD	200	.0000		0	0	0	0
21,205	08/29/14	BUY	203	11.7000		0	248,103	248,103	0
0	08/29/14	DIVD	204	.0000		0	0	0	0
363,322	09/12/14	BUY	206	11.5600		0	4,200,000	4,200,000	0
19,848	09/30/14	BUY	207	11.5500		0	229,246	229,246	0
0	09/30/14	DIVD	208	.0000		0	0	0	0
0	10/30/14	SELL	209	.0000		0	0	0	0
21,971	10/31/14	BUY	210	11.6400		0	255,746	255,746	0
0	10/31/14	DIVD	211	.0000		0	0	0	0
18,469	11/28/14	BUY	212	11.6700		0	215,532	215,532	0
0	11/28/14	DIVD	213	.0000		0	0	0	0
-----						-----	-----	-----	-----
80,514,024		BROKER TOTAL				0	98,201,233	103,914,713	5,713,481

Schedule SB, line 26 — Schedule of Active Participant Data

Attained age	Years of credited service										
	Under	1–4	5–9	10–14	15–19	20–24	25–29	30–34	35–39	40 &	Total
Under 25		63 76,100 7,990	2								65
25–29	2	107 82,678 8,895	79 121,913 21,797	6							194
30–34	4	85 97,396 10,402	109 131,188 23,703	72 163,744 29,235	2						272
35–39	1	76 114,256 12,680	66 122,337 22,125	90 162,334 29,496	31 191,393 35,674						264
40–44		50 146,792 13,137	39 126,410 23,845	50 150,384 28,368	40 188,345 52,695	16					195
45–49		39 130,804 13,756	15	25 128,580 33,965	34 143,581 44,214	22 188,697 75,409	11				146
50–54		19	12	14	10	10	29 160,610 82,192	31 194,168 109,862	1		126
55–59		19	2	2	6	10	14	35 158,700 105,526	16		104
60–64		8	3	2	2	1	2	3	3	1	25
65–69		1					1				2
70 & up											
Total	7	467	327	261	125	59	57	69	20	1	1,393

In each cell, the top number is the count of active participants for each age/service combination, the middle number is average pay for 2013 limited to \$255,000, and the bottom number is the average account balance as of January 1, 2014. Average pay and average account balance are not shown for cells with fewer than 20 participants.

Schedule SB, Part V — Statement of Actuarial Assumptions/Methods**Actuarial Assumptions for January 1, 2014 Funding Valuation**

Discount rate sponsor elections

• Segment rates or full yield curve	Segment		
• Look-back months	4		
•		<u>Stabilized</u>	<u>Nonstabilized</u>
• First 5 years		4.99%	1.37%
• Next 15 years		6.32%	4.05%
• Over 20 years		6.99%	5.06%

Mortality sponsor elections

• Healthy participants	Section 430(h)(3) prescribed separate static annuitant and nonannuitant mortality tables. These tables are based on the RP-2000 mortality tables projected with mortality improvement to the valuation year plus 7 and 15 years based on Scale AA.
• Pre-1995 disabilities	Revenue Ruling 96-7 table for participants who became disabled before 1995
• Post-1994 disabilities	Revenue Ruling 96-7 table for participants who became disabled after 1994 and are eligible for Social Security disability benefits

417(e) lump sums

Liabilities are determined based on the underlying annuity used by the plan to determine the lump sum amount, rather than valuing the lump sum payment. This annuity is valued based on funding interest rates rather than 417(e) rates and 2014 417(e) unisex mortality

Cash balance plans

• Interest accumulation rate	5.00%
• Whipsaw calculations	No
• Annuity conversion	
— Mortality table	Not applicable
— Interest rate basis	Not applicable

Other economic assumptions

• Salary increases	See table of sample rates.
• Inflation	2.50% per year.
• Cost-of-living increase on benefit	1.75% compounded annually.
• Expected investment return	8.00% per year for years 2012 through 2014
• Expenses	Administrative expenses paid from the trust during 2013 plus an estimate of the PBGC premiums paid in current year. \$2,043,373 added to current year normal cost.

Schedule SB, Part V — Statement of Actuarial Assumptions/Methods**Demographic assumptions**

- Withdrawal See table of sample rates.
- Disability incidence See table of sample rates.
- Retirement age

Attained age	Percentage
50 – 59	2.00%
60	40.00%
61	5.00%
62	40.00%
63 – 64	5.00%
65	40.00%
66 – 69	5.00%
70	100.00%

- Benefit commencement age for
 - Current and future vested deferred Traditional benefit – 50
Cash balance – Immediate
 - Former LeTourneau RIP vested deferred 60

	<u>Male participants</u>	<u>Female participants</u>
• Spouse assumptions		
— Percentage married	85%	60%
— Spouse age difference	0 years younger	0 years older
— Percentage married – former LeTourneau RIP	80%	80%
— Spouse age difference - former LeTourneau RIP	3 years younger	3 years older

Form of payment – traditional	<u>Lump sum</u> <u>(under</u> <u>\$25,000)</u>	<u>5 year</u> <u>certain & life</u>	<u>Single life</u> <u>based on 50%</u> <u>J&S</u>	<u>75% J&S</u>
• Active retirements	100%	40%	0%	60%
• Future vested deferred	100%	40%	0%	60%
• Future disabilities	100%	40%	0%	60%
• Future deaths	0%	0%	100%	0%
• Current vested deferred eligible for lump sum	80%	8%	0%	12%
• Current vested deferred not eligible for lump sum	0%	40%	0%	60%

Schedule SB, Part V — Statement of Actuarial Assumptions/Methods

Form of payment – cash balance	<u>Lump sum</u>			
• Active retirements	100%			
• Future vested deferred	100%			
• Future disabilities	100%			
• Future deaths	100%			
• Current vested deferred	100%			
Form of payment – former LeTourneau RIP vested deferred benefits	<u>Lump sum (under \$100,000)</u>	<u>Single life</u>	<u>Single life based on 50% J&S</u>	<u>75% J&S</u>
• Future deaths	0%	0%	100%	0%
• Current vested deferred eligible for lump sum	95%	1.75%	0%	3.25%
• Current vested deferred not eligible for lump sum	0%	35%	0%	65%
Unpredictable contingent event assumptions	Not applicable			

Table of Sample Rates**Salary Increases**

Attained age	Percentage increase at attained age	Ratio of salary at age 65 to salary at attained age
20	7.25%	715.5%
25	6.60	510.4
30	5.95	375.3
35	5.30	284.6
40	4.65	222.6
45	4.00	179.6
50	3.35	149.4
55	2.70	128.3
60	2.50	113.1

Schedule SB, Part V — Statement of Actuarial Assumptions/Methods

Attained age	Percentage	Percentage
	Disability incidence	Withdrawal*
20	0.090%	25.70%
25	0.100	20.32
30	0.110	15.44
35	0.120	11.32
40	0.150	7.82
45	0.215	5.12
50	0.330	3.30
55	0.580	2.16
60	1.180	1.62

* Ultimate rates for participants with at least 4 years of service. For other participants, the rates are 40% higher with service of 0 to 1 year, 30% higher with service of 1 to 2 years, 20% higher with service of 2 to 3 years and 10% higher with service of 3 to 4 years.

Actuarial Methods for Funding***Asset Methods***

The asset valuation method is an average of the adjusted market value for each year during the last two years preceding the valuation date. The adjusted market value is the market value at each determination date adjusted to the valuation date based on actual cash flows and expected interest at the lesser of the expected rate of return and the third segment rate. This amount is adjusted to be no greater than 110% and no less than 90% of the fair market value, as defined in IRC Section 430.

A characteristic of this asset method is that, over time, it is slightly more likely to produce an actuarial value of assets that is less than the market value of assets than an actuarial value that is greater than the market value.

Participant Methods

Participants or former participants are included or excluded from the valuation as described below:

- **Participants included:** The plan sponsor provides us with data on all employees as of the valuation date, but only those employees who have completed the plan's eligibility requirements are included in the valuation of liabilities.
- **Participants excluded:** No actuarial liability is included for nonvested participants who terminated prior to the valuation date. For this purpose, participants with a break in service on the valuation date are treated as terminated participants.
- **Insurance contracts:** The plan does not have any insurance contracts.

Minimum Funding Methods

The funding target for minimum funding calculations is computed using the traditional unit credit method of funding. The objective under this method is to fund each participant's

Schedule SB, Part V — Statement of Actuarial Assumptions/Methods

benefits under the plan as they accrue. Thus, the total pension to which each participant is expected to become entitled at retirement is broken down into units, each associated with a year of past or future credited service.

A detailed description of the calculation follows:

- The plan's valuation date is the beginning of the plan year.
- An individual's **funding target** is the present value of future benefits based on credited service and average pay as of the beginning of the plan year, and an individual's **target normal cost** is the present value of the benefit expected to accrue in the plan year. If multiple decrements are used, the funding target and the target normal cost for an individual is the sum of the component funding targets and target normal costs associated with the various anticipated separation dates.
- The plan's **target normal cost** is the sum of the individual target normal costs, and the plan's **funding target** is the sum of the individual funding targets for all participants under the plan.

ROWAN PENSION PLAN
EIN: 75-0759420 Plan Number: 001

Form 5500 Schedule H, Line 4j
Schedule of Reportable Transactions
For the Year Ended December 31, 2014

The following pages represent the Plan's reportable transactions for the year ended December 31, 2014.

		BASED ON MARKET VALUE OF		542,449,446	5% VALUE OF	27,122,472
IDENTITY OF PARTY INVOLVED	DESCRIPTION OF ASSET	PURCHASE PRICE SELLING PRICE	EXPENSES	COST OF ASSET	CURRENT VALUE	NET GAIN OR (LOSS)
092998319 BROKER 0800102	BLACKSTONE PARTNERS FUND ? BPIF NON TAXABLE LP MEMO					
43,700,342	01/30/14 SELL 13	1.1230	0	43,700,342	49,073,500	5,373,158
928989326 BROKER 0800094	JPMORGAN 100% US TREAS SEC MMKT FUND AGENCY SHARES MONTHLY VARIABLE 12/31/2049 MASTER NOTES					
49,073,500	01/30/14 BUY 10	100.0000	0	49,073,500	49,073,500	0
928989326 BROKER 0800094	JPMORGAN 100% US TREAS SEC MMKT FUND AGENCY SHARES MONTHLY VARIABLE 12/31/2049 MASTER NOTES					
49,073,500	01/31/14 SELL 12	100.0000	0	49,073,500	49,073,500	0
928989326 BROKER 0800094	JPMORGAN 100% US TREAS SEC MMKT FUND AGENCY SHARES MONTHLY VARIABLE 12/31/2049 MASTER NOTES					
49,073,500	01/31/14 BUY 2918	100.0000	0	49,073,500	49,073,500	0
928989326 BROKER 0800094	JPMORGAN 100% US TREAS SEC MMKT FUND AGENCY SHARES MONTHLY VARIABLE 12/31/2049 MASTER NOTES					
36,812,206	02/03/14 SELL 2930	100.0000	0	36,812,206	36,812,206	0

		BASED ON MARKET VALUE OF		542,449,446	5% VALUE OF	27,122,472		
IDENTITY OF PARTY INVOLVED		DESCRIPTION OF ASSET	PURCHASE PRICE SELLING PRICE	EXPENSES	COST OF ASSET	CURRENT VALUE	NET GAIN OR (LOSS)	
092998319 BLACKSTONE PARTNERS FUND ? BPIF NON TAXABLE LP								
BROKER 0800102 MEMO								
	43,700,342	01/30/14 S SELL	13	1.1230	0	43,700,342	49,073,500	5,373,158
	2,299,658	07/28/14 S SELL	17	1.1390	0	2,299,658	2,619,233	319,575
-----				-----				
	46,000,000	2 TOTAL SELLS		0	46,000,000	51,692,733	5,692,733	
-----				-----				
	46,000,000	SECURITY TOTAL		0	46,000,000	51,692,733	5,692,733	
199990581 COMMITMENT TO PURCHASE FUND								
BROKER 0800102 MEMO								
	8,000,000	02/03/14 B BUY	178	1.0000	0	8,000,000	8,000,000	0
	8,000,000	02/03/14 S SELL	183	1.0000	0	8,000,000	8,000,000	0
	1,443,000	04/15/14 B BUY	78	1.0000	0	1,443,000	1,443,000	0
	2,800,000	04/15/14 B BUY	191	1.0000	0	2,800,000	2,800,000	0
	2,800,000	04/15/14 S SELL	192	1.0000	0	2,800,000	2,800,000	0
	1,443,000	05/01/14 S SELL	81	1.0000	0	1,443,000	1,443,000	0
	4,200,000	09/12/14 B BUY	202	1.0000	0	4,200,000	4,200,000	0
	4,200,000	09/12/14 S SELL	205	1.0000	0	4,200,000	4,200,000	0
-----				-----				
	16,443,000	4 TOTAL BUYS		0	16,443,000	16,443,000	0	
	16,443,000	4 TOTAL SELLS		0	16,443,000	16,443,000	0	
-----				-----				
	32,886,000	SECURITY TOTAL		0	32,886,000	32,886,000	0	
928989326 JPMORGAN 100% US TREAS SEC MMKT FUND AGENCY SHARES								
MONTHLY VARIABLE 12/31/2049								
BROKER 0800094 MASTER NOTES								
	2,466,970	01/02/14 S SELL	2895	100.0000	0	2,466,970	2,466,970	0
	2,249,735	01/02/14 S SELL	4595253	100.0000	0	2,249,735	2,249,735	0
	43	01/03/14 B BUY	10848	100.0000	0	43	43	0
	218	01/03/14 B BUY	11948	100.0000	0	218	218	0
	358	01/06/14 S SELL	2898	100.0000	0	358	358	0
	5,555	01/10/14 S SELL	2902	100.0000	0	5,555	5,555	0
	2,586	01/10/14 B BUY	4595261	100.0000	0	2,586	2,586	0
	6,108,000	01/15/14 B BUY	2903	100.0000	0	6,108,000	6,108,000	0
	8,364	01/15/14 B BUY	4595271	100.0000	0	8,364	8,364	0
	1,266	01/17/14 B BUY	4595499	100.0000	0	1,266	1,266	0
	4,030	01/21/14 B BUY	4595501	100.0000	0	4,030	4,030	0
	4,370	01/22/14 B BUY	2909	100.0000	0	4,370	4,370	0
	1,950	01/23/14 B BUY	4595505	100.0000	0	1,950	1,950	0
	1	01/27/14 B BUY	4595508	100.0000	0	1	1	0
	3,889	01/29/14 B BUY	2912	100.0000	0	3,889	3,889	0
	49,073,500	01/30/14 B BUY	10	100.0000	0	49,073,500	49,073,500	0
	17,493	01/30/14 S SELL	2914	100.0000	0	17,493	17,493	0
	49,073,500	01/31/14 S SELL	12	100.0000	0	49,073,500	49,073,500	0
	49,073,500	01/31/14 B BUY	2918	100.0000	0	49,073,500	49,073,500	0

		BASED ON MARKET VALUE OF		542,449,446	5% VALUE OF	27,122,472
IDENTITY OF PARTY INVOLVED	DESCRIPTION OF ASSET	PURCHASE PRICE SELLING PRICE	EXPENSES	COST OF ASSET	CURRENT VALUE	NET GAIN OR (LOSS)
	0 01/31/14 S SELL 11952	100.0000	0	0	0	0
	6,058 01/31/14 B BUY 4595515	100.0000	0	6,058	6,058	0
16,750,000	02/03/14 B BUY 14	100.0000	0	16,750,000	16,750,000	0
9,750,000	02/03/14 B BUY 15	100.0000	0	9,750,000	9,750,000	0
36,812,206	02/03/14 S SELL 2930	100.0000	0	36,812,206	36,812,206	0
2,479	02/03/14 B BUY 4595516	100.0000	0	2,479	2,479	0
19,345	02/04/14 S SELL 2935	100.0000	0	19,345	19,345	0
9,750,000	02/05/14 S SELL 16	100.0000	0	9,750,000	9,750,000	0
7,016,342	02/05/14 S SELL 2945	100.0000	0	7,016,342	7,016,342	0
1,766	02/07/14 B BUY 2947	100.0000	0	1,766	1,766	0
591	02/10/14 S SELL 2949	100.0000	0	591	591	0
16,750,000	02/19/14 S SELL 15	100.0000	0	16,750,000	16,750,000	0
1,004	02/25/14 B BUY 2951	100.0000	0	1,004	1,004	0
0	02/25/14 B BUY 4595520	100.0000	0	0	0	0
21,252	02/28/14 S SELL 2953	100.0000	0	21,252	21,252	0
2,215,075	03/03/14 S SELL 2960	100.0000	0	2,215,075	2,215,075	0
61,735	03/04/14 S SELL 2963	100.0000	0	61,735	61,735	0
5,216	03/05/14 S SELL 2966	100.0000	0	5,216	5,216	0
2,073	03/06/14 S SELL 2969	100.0000	0	2,073	2,073	0
3,031	03/07/14 B BUY 2974	100.0000	0	3,031	3,031	0
26,336	03/10/14 S SELL 2976	100.0000	0	26,336	26,336	0
924	03/11/14 B BUY 2978	100.0000	0	924	924	0
1,038	03/25/14 B BUY 2982	100.0000	0	1,038	1,038	0
1	03/26/14 B BUY 4595526	100.0000	0	1	1	0
3,695	03/28/14 B BUY 2985	100.0000	0	3,695	3,695	0
33,622	03/31/14 S SELL 2988	100.0000	0	33,622	33,622	0
2,237,913	04/01/14 S SELL 2995	100.0000	0	2,237,913	2,237,913	0
1,069	04/03/14 B BUY 2998	100.0000	0	1,069	1,069	0
29,208	04/09/14 S SELL 3001	100.0000	0	29,208	29,208	0
1,062	04/14/14 B BUY 3002	100.0000	0	1,062	1,062	0
5,800,000	04/15/14 B BUY 20	100.0000	0	5,800,000	5,800,000	0
5,800,000	04/16/14 S SELL 21	100.0000	0	5,800,000	5,800,000	0
1	04/21/14 B BUY 4595533	100.0000	0	1	1	0
1,064	04/23/14 B BUY 3009	100.0000	0	1,064	1,064	0
4,078	04/30/14 B BUY 3014	100.0000	0	4,078	4,078	0
2,269,069	05/01/14 S SELL 3022	100.0000	0	2,269,069	2,269,069	0
2,512	05/05/14 B BUY 3025	100.0000	0	2,512	2,512	0
38,417	05/15/14 S SELL 3029	100.0000	0	38,417	38,417	0
1	05/16/14 B BUY 3031	100.0000	0	1	1	0
1,974	05/28/14 B BUY 3036	100.0000	0	1,974	1,974	0
2	05/28/14 B BUY 4595538	100.0000	0	2	2	0
2,363,469	06/02/14 S SELL 3045	100.0000	0	2,363,469	2,363,469	0
67,152	06/03/14 S SELL 3048	100.0000	0	67,152	67,152	0
36,284	06/04/14 B BUY 3052	100.0000	0	36,284	36,284	0
2,358	06/04/14 S SELL 10854	100.0000	0	2,358	2,358	0
7,188	06/04/14 S SELL 11954	100.0000	0	7,188	7,188	0
26,737	06/04/14 S SELL 4595541	100.0000	0	26,737	26,737	0

		BASED ON MARKET VALUE OF		542,449,446	5% VALUE OF	27,122,472
IDENTITY OF PARTY INVOLVED	DESCRIPTION OF ASSET	PURCHASE PRICE SELLING PRICE	EXPENSES	COST OF ASSET	CURRENT VALUE	NET GAIN OR (LOSS)
109	06/05/14 B BUY 3054	100.0000	0	109	109	0
800	06/17/14 S SELL 3056	100.0000	0	800	800	0
1,012	06/26/14 B BUY 3058	100.0000	0	1,012	1,012	0
2	06/26/14 B BUY 4595545	100.0000	0	2	2	0
3,931	06/27/14 B BUY 3061	100.0000	0	3,931	3,931	0
55,535	06/30/14 S SELL 3065	100.0000	0	55,535	55,535	0
2,598,913	07/01/14 S SELL 3072	100.0000	0	2,598,913	2,598,913	0
21,130	07/02/14 S SELL 3074	100.0000	0	21,130	21,130	0
316	07/03/14 B BUY 3076	100.0000	0	316	316	0
23,885	07/08/14 S SELL 3079	100.0000	0	23,885	23,885	0
166	07/09/14 B BUY 3082	100.0000	0	166	166	0
35,670	07/10/14 S SELL 3084	100.0000	0	35,670	35,670	0
107	07/11/14 S SELL 3086	100.0000	0	107	107	0
8,128,000	07/15/14 B BUY 3090	100.0000	0	8,128,000	8,128,000	0
24,932	07/16/14 S SELL 3094	100.0000	0	24,932	24,932	0
17,053	07/18/14 S SELL 3097	100.0000	0	17,053	17,053	0
1,245	07/23/14 B BUY 3099	100.0000	0	1,245	1,245	0
2,619,613	07/28/14 B BUY 14	100.0000	0	2,619,613	2,619,613	0
1	07/28/14 B BUY 4595550	100.0000	0	1	1	0
4,386	07/30/14 B BUY 3102	100.0000	0	4,386	4,386	0
2,619,613	07/31/14 S SELL 16	100.0000	0	2,619,613	2,619,613	0
2,602,488	07/31/14 B BUY 3105	100.0000	0	2,602,488	2,602,488	0
2,727,832	08/01/14 S SELL 3112	100.0000	0	2,727,832	2,727,832	0
85,691	08/04/14 S SELL 3118	100.0000	0	85,691	85,691	0
2,261	08/05/14 B BUY 3121	100.0000	0	2,261	2,261	0
2,124	08/06/14 S SELL 3124	100.0000	0	2,124	2,124	0
18,203	08/08/14 S SELL 3126	100.0000	0	18,203	18,203	0
63,994	08/11/14 S SELL 3130	100.0000	0	63,994	63,994	0
4,658	08/13/14 S SELL 3133	100.0000	0	4,658	4,658	0
11,926	08/18/14 S SELL 3137	100.0000	0	11,926	11,926	0
1,540	08/26/14 B BUY 3140	100.0000	0	1,540	1,540	0
12	08/26/14 B BUY 4595555	100.0000	0	12	12	0
2,500	08/27/14 S SELL 3142	100.0000	0	2,500	2,500	0
11	08/27/14 S SELL 4595556	100.0000	0	11	11	0
4,307	08/28/14 B BUY 3145	100.0000	0	4,307	4,307	0
2,685,091	09/02/14 S SELL 3152	100.0000	0	2,685,091	2,685,091	0
168	09/03/14 B BUY 3154	100.0000	0	168	168	0
3,323	09/04/14 B BUY 3157	100.0000	0	3,323	3,323	0
3,670	09/08/14 B BUY 3159	100.0000	0	3,670	3,670	0
4,499	09/09/14 S SELL 3161	100.0000	0	4,499	4,499	0
4,200,000	09/12/14 B BUY 16	100.0000	0	4,200,000	4,200,000	0
9,027,000	09/12/14 B BUY 3166	100.0000	0	9,027,000	9,027,000	0
4,200,000	09/16/14 S SELL 18	100.0000	0	4,200,000	4,200,000	0
1,620	09/16/14 B BUY 3169	100.0000	0	1,620	1,620	0
8,229	09/19/14 S SELL 3171	100.0000	0	8,229	8,229	0
373	09/24/14 S SELL 3173	100.0000	0	373	373	0
12	09/24/14 B BUY 4595561	100.0000	0	12	12	0

		BASED ON MARKET VALUE OF		542,449,446	5% VALUE OF	27,122,472
IDENTITY OF PARTY INVOLVED	DESCRIPTION OF ASSET	PURCHASE PRICE SELLING PRICE	EXPENSES	COST OF ASSET	CURRENT VALUE	NET GAIN OR (LOSS)
6,355	09/26/14 B BUY 3176	100.0000	0	6,355	6,355	0
10	09/29/14 S SELL 4595563	100.0000	0	10	10	0
16,127	09/30/14 S SELL 3178	100.0000	0	16,127	16,127	0
2,473,905	10/01/14 S SELL 3186	100.0000	0	2,473,905	2,473,905	0
15,278	10/02/14 S SELL 3190	100.0000	0	15,278	15,278	0
43,800	10/03/14 S SELL 3192	100.0000	0	43,800	43,800	0
53,411	10/06/14 S SELL 3195	100.0000	0	53,411	53,411	0
15,203	10/07/14 S SELL 3198	100.0000	0	15,203	15,203	0
894	10/08/14 B BUY 3200	100.0000	0	894	894	0
28,446	10/09/14 S SELL 3203	100.0000	0	28,446	28,446	0
1,426,943	10/14/14 S SELL 3211	100.0000	0	1,426,943	1,426,943	0
52,159	10/16/14 S SELL 3215	100.0000	0	52,159	52,159	0
687	10/23/14 B BUY 3217	100.0000	0	687	687	0
687	10/24/14 S SELL 3219	100.0000	0	687	687	0
3	10/24/14 B BUY 4595567	100.0000	0	3	3	0
5,662	10/27/14 B BUY 3222	100.0000	0	5,662	5,662	0
17,186	10/30/14 S SELL 3227	100.0000	0	17,186	17,186	0
2,828,587	11/03/14 S SELL 3238	100.0000	0	2,828,587	2,828,587	0
18,715	11/04/14 S SELL 3242	100.0000	0	18,715	18,715	0
1,814	11/05/14 B BUY 3244	100.0000	0	1,814	1,814	0
131	11/06/14 S SELL 3246	100.0000	0	131	131	0
31,338	11/07/14 S SELL 3248	100.0000	0	31,338	31,338	0
23,273	11/17/14 S SELL 3252	100.0000	0	23,273	23,273	0
919	11/25/14 B BUY 3254	100.0000	0	919	919	0
3,035,385	12/01/14 S SELL 3262	100.0000	0	3,035,385	3,035,385	0
3	12/01/14 B BUY 4595573	100.0000	0	3	3	0
31,610	12/02/14 S SELL 3265	100.0000	0	31,610	31,610	0
33,469	12/03/14 S SELL 3267	100.0000	0	33,469	33,469	0
11,696	12/04/14 S SELL 3270	100.0000	0	11,696	11,696	0
96,013	12/05/14 S SELL 3273	100.0000	0	96,013	96,013	0
96	12/08/14 S SELL 3275	100.0000	0	96	96	0
55,573	12/09/14 S SELL 3281	100.0000	0	55,573	55,573	0
33,796	12/10/14 S SELL 3283	100.0000	0	33,796	33,796	0
17,563	12/12/14 S SELL 3285	100.0000	0	17,563	17,563	0
72,566	12/15/14 S SELL 3287	100.0000	0	72,566	72,566	0
44,654	12/17/14 S SELL 3289	100.0000	0	44,654	44,654	0
810	12/23/14 B BUY 3293	100.0000	0	810	810	0
1,620	12/24/14 B BUY 3295	100.0000	0	1,620	1,620	0
13	12/24/14 B BUY 4595580	100.0000	0	13	13	0
8	12/26/14 S SELL 4595581	100.0000	0	8	8	0
14,339	12/29/14 S SELL 3299	100.0000	0	14,339	14,339	0
16,272	12/30/14 S SELL 3302	100.0000	0	16,272	16,272	0
3,650	12/31/14 B BUY 3307	100.0000	0	3,650	3,650	0
163,277,372	71 TOTAL BUYS		0	163,277,372	163,277,372	0
165,089,923	85 TOTAL SELLS		0	165,089,923	165,089,923	0

DESCRIPTION OF ASSET IDENTITY OF PARTY INVOLVED		BASED ON MARKET VALUE OF PURCHASE PRICE SELLING PRICE	EXPENSES	542,449,446 COST OF ASSET	5% VALUE OF CURRENT VALUE	27,122,472 NET GAIN OR (LOSS)
328,367,295	SECURITY TOTAL		0	328,367,295	328,367,295	0

		BASED ON MARKET VALUE OF		542,449,446	5% VALUE OF	27,122,472
IDENTITY OF PARTY INVOLVED	DESCRIPTION OF ASSET	PURCHASE PRICE SELLING PRICE	EXPENSES	COST OF ASSET	CURRENT VALUE	NET GAIN OR (LOSS)
BROKER 0800094	MASTER NOTES					
-----	-----					
928989326	JPMORGAN 100% US TREAS SEC MMKT FUND AGENCY SHARES					
	MONTHLY VARIABLE 12/31/2049					
49,073,500	01/30/14 BUY 10	100.0000	0	49,073,500	49,073,500	0
49,073,500	01/31/14 SELL 12	100.0000	0	49,073,500	49,073,500	0
49,073,500	01/31/14 BUY 2918	100.0000	0	49,073,500	49,073,500	0
36,812,206	02/03/14 SELL 2930	100.0000	0	36,812,206	36,812,206	0
2,466,970	01/02/14 SELL 2895	100.0000	0	2,466,970	2,466,970	0
2,249,735	01/02/14 SELL 4595253	100.0000	0	2,249,735	2,249,735	0
43	01/03/14 BUY 10848	100.0000	0	43	43	0
218	01/03/14 BUY 11948	100.0000	0	218	218	0
358	01/06/14 SELL 2898	100.0000	0	358	358	0
5,555	01/10/14 SELL 2902	100.0000	0	5,555	5,555	0
2,586	01/10/14 BUY 4595261	100.0000	0	2,586	2,586	0
6,108,000	01/15/14 BUY 2903	100.0000	0	6,108,000	6,108,000	0
8,364	01/15/14 BUY 4595271	100.0000	0	8,364	8,364	0
1,266	01/17/14 BUY 4595499	100.0000	0	1,266	1,266	0
4,030	01/21/14 BUY 4595501	100.0000	0	4,030	4,030	0
4,370	01/22/14 BUY 2909	100.0000	0	4,370	4,370	0
1,950	01/23/14 BUY 4595505	100.0000	0	1,950	1,950	0
1	01/27/14 BUY 4595508	100.0000	0	1	1	0
3,889	01/29/14 BUY 2912	100.0000	0	3,889	3,889	0
17,493	01/30/14 SELL 2914	100.0000	0	17,493	17,493	0
0	01/31/14 SELL 11952	100.0000	0	0	0	0
6,058	01/31/14 BUY 4595515	100.0000	0	6,058	6,058	0
16,750,000	02/03/14 BUY 14	100.0000	0	16,750,000	16,750,000	0
9,750,000	02/03/14 BUY 15	100.0000	0	9,750,000	9,750,000	0
2,479	02/03/14 BUY 4595516	100.0000	0	2,479	2,479	0
19,345	02/04/14 SELL 2935	100.0000	0	19,345	19,345	0
9,750,000	02/05/14 SELL 16	100.0000	0	9,750,000	9,750,000	0
7,016,342	02/05/14 SELL 2945	100.0000	0	7,016,342	7,016,342	0
1,766	02/07/14 BUY 2947	100.0000	0	1,766	1,766	0
591	02/10/14 SELL 2949	100.0000	0	591	591	0
16,750,000	02/19/14 SELL 15	100.0000	0	16,750,000	16,750,000	0
1,004	02/25/14 BUY 2951	100.0000	0	1,004	1,004	0
0	02/25/14 BUY 4595520	100.0000	0	0	0	0
21,252	02/28/14 SELL 2953	100.0000	0	21,252	21,252	0
2,215,075	03/03/14 SELL 2960	100.0000	0	2,215,075	2,215,075	0
61,735	03/04/14 SELL 2963	100.0000	0	61,735	61,735	0
5,216	03/05/14 SELL 2966	100.0000	0	5,216	5,216	0
2,073	03/06/14 SELL 2969	100.0000	0	2,073	2,073	0
3,031	03/07/14 BUY 2974	100.0000	0	3,031	3,031	0
26,336	03/10/14 SELL 2976	100.0000	0	26,336	26,336	0
924	03/11/14 BUY 2978	100.0000	0	924	924	0
1,038	03/25/14 BUY 2982	100.0000	0	1,038	1,038	0

IDENTITY OF PARTY INVOLVED		PURCHASE PRICE		EXPENSES	COST OF ASSET	CURRENT VALUE	NET GAIN OR (LOSS)
DESCRIPTION OF ASSET		SELLING PRICE					
		BASED ON MARKET VALUE OF			542,449,446	5% VALUE OF	27,122,472
1	03/26/14 BUY	4595526	100.0000	0	1	1	0
3,695	03/28/14 BUY	2985	100.0000	0	3,695	3,695	0
33,622	03/31/14 SELL	2988	100.0000	0	33,622	33,622	0
2,237,913	04/01/14 SELL	2995	100.0000	0	2,237,913	2,237,913	0
1,069	04/03/14 BUY	2998	100.0000	0	1,069	1,069	0
29,208	04/09/14 SELL	3001	100.0000	0	29,208	29,208	0
1,062	04/14/14 BUY	3002	100.0000	0	1,062	1,062	0
5,800,000	04/15/14 BUY	20	100.0000	0	5,800,000	5,800,000	0
5,800,000	04/16/14 SELL	21	100.0000	0	5,800,000	5,800,000	0
1	04/21/14 BUY	4595533	100.0000	0	1	1	0
1,064	04/23/14 BUY	3009	100.0000	0	1,064	1,064	0
4,078	04/30/14 BUY	3014	100.0000	0	4,078	4,078	0
2,269,069	05/01/14 SELL	3022	100.0000	0	2,269,069	2,269,069	0
2,512	05/05/14 BUY	3025	100.0000	0	2,512	2,512	0
38,417	05/15/14 SELL	3029	100.0000	0	38,417	38,417	0
1	05/16/14 BUY	3031	100.0000	0	1	1	0
1,974	05/28/14 BUY	3036	100.0000	0	1,974	1,974	0
2	05/28/14 BUY	4595538	100.0000	0	2	2	0
2,363,469	06/02/14 SELL	3045	100.0000	0	2,363,469	2,363,469	0
67,152	06/03/14 SELL	3048	100.0000	0	67,152	67,152	0
36,284	06/04/14 BUY	3052	100.0000	0	36,284	36,284	0
2,358	06/04/14 SELL	10854	100.0000	0	2,358	2,358	0
7,188	06/04/14 SELL	11954	100.0000	0	7,188	7,188	0
26,737	06/04/14 SELL	4595541	100.0000	0	26,737	26,737	0
109	06/05/14 BUY	3054	100.0000	0	109	109	0
800	06/17/14 SELL	3056	100.0000	0	800	800	0
1,012	06/26/14 BUY	3058	100.0000	0	1,012	1,012	0
2	06/26/14 BUY	4595545	100.0000	0	2	2	0
3,931	06/27/14 BUY	3061	100.0000	0	3,931	3,931	0
55,535	06/30/14 SELL	3065	100.0000	0	55,535	55,535	0
2,598,913	07/01/14 SELL	3072	100.0000	0	2,598,913	2,598,913	0
21,130	07/02/14 SELL	3074	100.0000	0	21,130	21,130	0
316	07/03/14 BUY	3076	100.0000	0	316	316	0
23,885	07/08/14 SELL	3079	100.0000	0	23,885	23,885	0
166	07/09/14 BUY	3082	100.0000	0	166	166	0
35,670	07/10/14 SELL	3084	100.0000	0	35,670	35,670	0
107	07/11/14 SELL	3086	100.0000	0	107	107	0
8,128,000	07/15/14 BUY	3090	100.0000	0	8,128,000	8,128,000	0
24,932	07/16/14 SELL	3094	100.0000	0	24,932	24,932	0
17,053	07/18/14 SELL	3097	100.0000	0	17,053	17,053	0
1,245	07/23/14 BUY	3099	100.0000	0	1,245	1,245	0
2,619,613	07/28/14 BUY	14	100.0000	0	2,619,613	2,619,613	0
1	07/28/14 BUY	4595550	100.0000	0	1	1	0
4,386	07/30/14 BUY	3102	100.0000	0	4,386	4,386	0
2,619,613	07/31/14 SELL	16	100.0000	0	2,619,613	2,619,613	0
2,602,488	07/31/14 BUY	3105	100.0000	0	2,602,488	2,602,488	0
2,727,832	08/01/14 SELL	3112	100.0000	0	2,727,832	2,727,832	0

				BASED ON MARKET VALUE OF		542,449,446	5% VALUE OF	27,122,472
IDENTITY OF PARTY INVOLVED DESCRIPTION OF ASSET				PURCHASE PRICE SELLING PRICE	EXPENSES	COST OF ASSET	CURRENT VALUE	NET GAIN OR (LOSS)
85,691	08/04/14	SELL	3118	100.0000	0	85,691	85,691	0
2,261	08/05/14	BUY	3121	100.0000	0	2,261	2,261	0
2,124	08/06/14	SELL	3124	100.0000	0	2,124	2,124	0
18,203	08/08/14	SELL	3126	100.0000	0	18,203	18,203	0
63,994	08/11/14	SELL	3130	100.0000	0	63,994	63,994	0
4,658	08/13/14	SELL	3133	100.0000	0	4,658	4,658	0
11,926	08/18/14	SELL	3137	100.0000	0	11,926	11,926	0
1,540	08/26/14	BUY	3140	100.0000	0	1,540	1,540	0
12	08/26/14	BUY	4595555	100.0000	0	12	12	0
2,500	08/27/14	SELL	3142	100.0000	0	2,500	2,500	0
11	08/27/14	SELL	4595556	100.0000	0	11	11	0
4,307	08/28/14	BUY	3145	100.0000	0	4,307	4,307	0
2,685,091	09/02/14	SELL	3152	100.0000	0	2,685,091	2,685,091	0
168	09/03/14	BUY	3154	100.0000	0	168	168	0
3,323	09/04/14	BUY	3157	100.0000	0	3,323	3,323	0
3,670	09/08/14	BUY	3159	100.0000	0	3,670	3,670	0
4,499	09/09/14	SELL	3161	100.0000	0	4,499	4,499	0
4,200,000	09/12/14	BUY	16	100.0000	0	4,200,000	4,200,000	0
9,027,000	09/12/14	BUY	3166	100.0000	0	9,027,000	9,027,000	0
4,200,000	09/16/14	SELL	18	100.0000	0	4,200,000	4,200,000	0
1,620	09/16/14	BUY	3169	100.0000	0	1,620	1,620	0
8,229	09/19/14	SELL	3171	100.0000	0	8,229	8,229	0
373	09/24/14	SELL	3173	100.0000	0	373	373	0
12	09/24/14	BUY	4595561	100.0000	0	12	12	0
6,355	09/26/14	BUY	3176	100.0000	0	6,355	6,355	0
10	09/29/14	SELL	4595563	100.0000	0	10	10	0
16,127	09/30/14	SELL	3178	100.0000	0	16,127	16,127	0
2,473,905	10/01/14	SELL	3186	100.0000	0	2,473,905	2,473,905	0
15,278	10/02/14	SELL	3190	100.0000	0	15,278	15,278	0
43,800	10/03/14	SELL	3192	100.0000	0	43,800	43,800	0
53,411	10/06/14	SELL	3195	100.0000	0	53,411	53,411	0
15,203	10/07/14	SELL	3198	100.0000	0	15,203	15,203	0
894	10/08/14	BUY	3200	100.0000	0	894	894	0
28,446	10/09/14	SELL	3203	100.0000	0	28,446	28,446	0
1,426,943	10/14/14	SELL	3211	100.0000	0	1,426,943	1,426,943	0
52,159	10/16/14	SELL	3215	100.0000	0	52,159	52,159	0
687	10/23/14	BUY	3217	100.0000	0	687	687	0
687	10/24/14	SELL	3219	100.0000	0	687	687	0
3	10/24/14	BUY	4595567	100.0000	0	3	3	0
5,662	10/27/14	BUY	3222	100.0000	0	5,662	5,662	0
17,186	10/30/14	SELL	3227	100.0000	0	17,186	17,186	0
2,828,587	11/03/14	SELL	3238	100.0000	0	2,828,587	2,828,587	0
18,715	11/04/14	SELL	3242	100.0000	0	18,715	18,715	0
1,814	11/05/14	BUY	3244	100.0000	0	1,814	1,814	0
131	11/06/14	SELL	3246	100.0000	0	131	131	0
31,338	11/07/14	SELL	3248	100.0000	0	31,338	31,338	0
23,273	11/17/14	SELL	3252	100.0000	0	23,273	23,273	0

IDENTITY OF PARTY INVOLVED		DESCRIPTION OF ASSET		PURCHASE PRICE	EXPENSES	COST OF ASSET	CURRENT VALUE	NET GAIN OR (LOSS)
				SELLING PRICE				
				BASED ON MARKET VALUE OF		542,449,446	5% VALUE OF	27,122,472
919	11/25/14	BUY	3254	100.0000	0	919	919	0
3,035,385	12/01/14	SELL	3262	100.0000	0	3,035,385	3,035,385	0
3	12/01/14	BUY	4595573	100.0000	0	3	3	0
31,610	12/02/14	SELL	3265	100.0000	0	31,610	31,610	0
33,469	12/03/14	SELL	3267	100.0000	0	33,469	33,469	0
11,696	12/04/14	SELL	3270	100.0000	0	11,696	11,696	0
96,013	12/05/14	SELL	3273	100.0000	0	96,013	96,013	0
96	12/08/14	SELL	3275	100.0000	0	96	96	0
55,573	12/09/14	SELL	3281	100.0000	0	55,573	55,573	0
33,796	12/10/14	SELL	3283	100.0000	0	33,796	33,796	0
17,563	12/12/14	SELL	3285	100.0000	0	17,563	17,563	0
72,566	12/15/14	SELL	3287	100.0000	0	72,566	72,566	0
44,654	12/17/14	SELL	3289	100.0000	0	44,654	44,654	0
810	12/23/14	BUY	3293	100.0000	0	810	810	0
1,620	12/24/14	BUY	3295	100.0000	0	1,620	1,620	0
13	12/24/14	BUY	4595580	100.0000	0	13	13	0
8	12/26/14	SELL	4595581	100.0000	0	8	8	0
14,339	12/29/14	SELL	3299	100.0000	0	14,339	14,339	0
16,272	12/30/14	SELL	3302	100.0000	0	16,272	16,272	0
3,650	12/31/14	BUY	3307	100.0000	0	3,650	3,650	0
328,367,295		BROKER TOTAL			0	328,367,295	328,367,295	0

IDENTITY OF PARTY INVOLVED DESCRIPTION OF ASSET		PURCHASE PRICE SELLING PRICE		EXPENSES	COST OF ASSET		CURRENT VALUE	NET GAIN OR (LOSS)
BROKER 0800102 MEMO -----								
092998319 BLACKSTONE PARTNERS FUND ? BPIF NON TAXABLE LP								
43,700,342	01/30/14 SELL	13	1.1230	0	43,700,342	49,073,500	5,373,158	
2,299,658	07/28/14 SELL	17	1.1390	0	2,299,658	2,619,233	319,575	
199990581 COMMITMENT TO PURCHASE FUND								
8,000,000	02/03/14 BUY	178	1.0000	0	8,000,000	8,000,000	0	
8,000,000	02/03/14 SELL	183	1.0000	0	8,000,000	8,000,000	0	
1,443,000	04/15/14 BUY	78	1.0000	0	1,443,000	1,443,000	0	
2,800,000	04/15/14 BUY	191	1.0000	0	2,800,000	2,800,000	0	
2,800,000	04/15/14 SELL	192	1.0000	0	2,800,000	2,800,000	0	
1,443,000	05/01/14 SELL	81	1.0000	0	1,443,000	1,443,000	0	
4,200,000	09/12/14 BUY	202	1.0000	0	4,200,000	4,200,000	0	
4,200,000	09/12/14 SELL	205	1.0000	0	4,200,000	4,200,000	0	
74348T102 PROSPECT CAPITAL CORP COMMON STOCK USD 0.001								
0	12/15/14 SELL	4595575	29.4000	0	1	3	2	
783999428 RUSSELL 2000 INDEX NL FUND								
1	03/11/14 SELL	5	78.2247	0	68	70	2	
83	07/14/14 SELL	7	76.8437	0	6,299	6,356	57	
82	09/05/14 SELL	11	77.2471	0	6,231	6,320	89	
80	12/04/14 SELL	17	77.7647	0	6,105	6,234	129	
G91993694 UBS TRUMBULL PROPERTY FUND (TPF)								
19	10/01/14 BUY	219	9,210.6159	0	179,018	179,018	0	
0	10/01/14 INT	220	.0000	0	0	0	0	
M96995697 URDANG EB GLOBAL REAL ESTATE SECURITIES FUND OF THE BANK OF NEW YORK MELLON								
1,784	03/03/14 SELL	76	16.1700	0	25,731	28,854	3,123	
87,033	05/01/14 BUY	80	16.5800	0	1,443,000	1,443,000	0	
1,687	06/02/14 SELL	82	17.3000	0	24,624	29,179	4,555	
1,883	09/02/14 SELL	84	17.8600	0	27,494	33,634	6,141	
1,910	11/13/14 SELL	86	18.0800	0	27,892	34,542	6,650	
957663669 WESTERN ASSET CORE PLUS BOND FUND OPEN-END FUND USD								
18,154	01/31/14 BUY	181	11.3400	0	205,869	205,869	0	
0	01/31/14 DIVD	182	.0000	0	0	0	0	
703,606	02/03/14 BUY	184	11.3700	0	8,000,000	8,000,000	0	
19,060	02/28/14 BUY	185	11.4100	0	217,479	217,479	0	
0	02/28/14 DIVD	186	.0000	0	0	0	0	
19,784	03/31/14 BUY	187	11.4000	0	225,542	225,542	0	
0	03/31/14 DIVD	188	.0000	0	0	0	0	

				BASED ON MARKET VALUE OF		542,449,446	5% VALUE OF	27,122,472	
IDENTITY OF PARTY INVOLVED				PURCHASE PRICE		EXPENSES	COST OF ASSET	CURRENT VALUE	NET GAIN OR (LOSS)
DESCRIPTION OF ASSET				SELLING PRICE					
244,115	04/15/14	BUY	190	11.4700	0	2,800,000	2,800,000	0	
20,841	04/30/14	BUY	193	11.4800	0	239,256	239,256	0	
0	04/30/14	DIVD	194	.0000	0	0	0	0	
22,225	05/30/14	BUY	195	11.6100	0	258,034	258,034	0	
0	05/30/14	DIVD	196	.0000	0	0	0	0	
19,368	06/30/14	BUY	197	11.6200	0	225,058	225,058	0	
0	06/30/14	DIVD	198	.0000	0	0	0	0	
21,494	07/31/14	BUY	199	11.5800	0	248,905	248,905	0	
0	07/31/14	DIVD	200	.0000	0	0	0	0	
21,205	08/29/14	BUY	203	11.7000	0	248,103	248,103	0	
0	08/29/14	DIVD	204	.0000	0	0	0	0	
363,322	09/12/14	BUY	206	11.5600	0	4,200,000	4,200,000	0	
19,848	09/30/14	BUY	207	11.5500	0	229,246	229,246	0	
0	09/30/14	DIVD	208	.0000	0	0	0	0	
0	10/30/14	SELL	209	.0000	0	0	0	0	
21,971	10/31/14	BUY	210	11.6400	0	255,746	255,746	0	
0	10/31/14	DIVD	211	.0000	0	0	0	0	
18,469	11/28/14	BUY	212	11.6700	0	215,532	215,532	0	
0	11/28/14	DIVD	213	.0000	0	0	0	0	
-----				-----		-----	-----	-----	
80,514,024		BROKER TOTAL		0		98,201,233	103,914,713	5,713,481	

SCHEDULE SB (Form 5500) <small>Department of the Treasury Internal Revenue Service</small> <small>Department of Labor Employee Benefits Security Administration</small> <small>Pension Benefit Guaranty Corporation</small>	Single-Employer Defined Benefit Plan Actuarial Information This schedule is required to be filed under section 104 of the Employee Retirement Income Security Act of 1974 (ERISA) and section 6059 of the Internal Revenue Code (the Code). ► File as an attachment to Form 5500 or 5500-SF.	OMB No. 1210-0110 2014 This Form is Open to Public Inspection
---	--	---

For calendar plan year 2014 or fiscal plan year beginning 01/01/2014 and ending 12/31/2014

► Round off amounts to nearest dollar.

► Caution: A penalty of \$1,000 will be assessed for late filing of this report unless reasonable cause is established.

A Name of plan THE ROWAN PENSION PLAN	B Three-digit plan number (PN) ►	001
C Plan sponsor's name as shown on line 2a of Form 5500 or 5500-SF ROWAN COMPANIES, INC.	D Employer Identification Number (EIN) 75-0759420	
E Type of plan: ☒ Single ☐ Multiple-A ☐ Multiple-B		
F Prior year plan size: ☐ 100 or fewer ☐ 101-500 ☒ More than 500		

Part I Basic Information			
1 Enter the valuation date: Month <u>01</u> Day <u>01</u> Year <u>2014</u>			
2 Assets:			
a Market value	2a	591443381	
b Actuarial value	2b	559158859	
3 Funding target/participant count breakdown	(1) Number of participants	(2) Vested Funding Target	(3) Total Funding Target
a For retired participants and beneficiaries receiving payment	2022	303196437	303196437
b For terminated vested participants	2036	125709968	125709968
c For active participants	1393	125204253	126371907
d Total	5451	554110658	555278312
4 If the plan is in at-risk status, check the box and complete lines (a) and (b) ☐			
a Funding target disregarding prescribed at-risk assumptions	4a		
b Funding target reflecting at-risk assumptions, but disregarding transition rule for plans that have been in at-risk status for fewer than five consecutive years and disregarding loading factor	4b		
5 Effective interest rate	5	6.54%	
6 Target normal cost	6	12746057	

Statement by Enrolled Actuary
 To the best of my knowledge, the information supplied in this schedule and accompanying schedules, statements and attachments, if any, is complete and accurate. Each prescribed assumption was applied in accordance with applicable law and regulations. In my opinion, each other assumption is reasonable (taking into account the experience of the plan and reasonable expectations) and such other assumptions, in combination, offer my best estimate of anticipated experience under the plan.

SIGN HERE	<div style="font-size: 2em; color: blue; margin-bottom: 10px;">KB</div> Signature of actuary KEVIN BILLS Type or print name of actuary MERCER Firm name 500 DALLAS STREET, SUITE 1400 HOUSTON TX 77002-4800 Address of the firm	<div style="font-size: 1.2em; color: blue; margin-bottom: 10px;">10/8/2015</div> Date 1407029 Most recent enrollment number 713-276-2100 Telephone number (including area code)
------------------	--	---

If the actuary has not fully reflected any regulation or ruling promulgated under the statute in completing this schedule, check the box and see instructions ☐

Part II Beginning of Year Carryover and Prefunding Balances

Beginning of Year Carryover and Prefunding Balances		(a) Carryover balance	(b) Prefunding balance
7	Balance at beginning of prior year after applicable adjustments (line 13 from prior year)		18322575
8	Portion elected for use to offset prior year's funding requirement (line 35 from prior year)		18322575
9	Amount remaining (line 7 minus line 8)	0	0
10	Interest on line 9 using prior year's actual return of <u>14.88</u> %	0	0
11	Prior year's excess contributions to be added to prefunding balance:		
a	Present value of excess contributions (line 38a from prior year)		34401586
b(1)	Interest on the excess, if any, of line 38a over line 38b from prior year Schedule SB, using prior year's effective interest rate of <u>6.74</u> %		1083725
b(2)	Interest on line 38b from prior year Schedule SB, using prior year's actual return		2726399
c	Total available at beginning of current plan year to add to prefunding balance		38211710
d	Portion of (c) to be added to prefunding balance		38211710
12	Other reductions in balances due to elections or deemed elections		0
13	Balance at beginning of current year (line 9 + line 10 + line 11d – line 12)	0	38211710

Part III Funding Percentages

14	Funding target attainment percentage	14	93.81%
15	Adjusted funding target attainment percentage	15	100.69%
16	Prior year's funding percentage for purposes of determining whether carryover/prefunding balances may be used to reduce current year's funding requirement.....	16	92.08%
17	If the current value of the assets of the plan is less than 70 percent of the funding target, enter such percentage.	17	%

Part IV Contributions and Liquidity Shortfalls

18 Contributions made to the plan for the plan year by employer(s) and employees:

(a) Date (MM-DD-YYYY)	(b) Amount paid by employer(s)	(c) Amount paid by employees	(a) Date (MM-DD-YYYY)	(b) Amount paid by employer(s)	(c) Amount paid by employees
			Totals ►	18(b)	0 18(c)

19 Discounted employer contributions – see instructions for small plan with a valuation date after the beginning of the year:

a Contributions allocated toward unpaid minimum required contributions from prior years.....	19a	0
b Contributions made to avoid restrictions adjusted to valuation date	19b	0
c Contributions allocated toward minimum required contribution for current year adjusted to valuation date	19c	0

20 Quarterly contributions and liquidity shortfalls:

a Did the plan have a "funding shortfall" for the prior year? ☒ Yes ☐ No

b If line 20a is "Yes," were required quarterly installments for the current year made in a timely manner? ☒ Yes ☐ No

C If line 20a is "Yes," see instructions and complete the following table as applicable:

Liquidity shortfall as of end of quarter of this plan year			
(1) 1st	(2) 2nd	(3) 3rd	(4) 4th
0	0	0	0

Part V Assumptions Used to Determine Funding Target and Target Normal Cost

21 Discount rate:			
a Segment rates:	1st segment: 4.99%	2nd segment: 6.32%	3rd segment: 6.99%
			☐ N/A, full yield curve used
b Applicable month (enter code)			21b 4
22 Weighted average retirement age			22 52
23 Mortality table(s) (see instructions) ☐ Prescribed - combined ☒ Prescribed - separate ☐ Substitute			

Part VI Miscellaneous Items

24 Has a change been made in the non-prescribed actuarial assumptions for the current plan year? If "Yes," see instructions regarding required attachment.		☒ Yes ☐ No
25 Has a method change been made for the current plan year? If "Yes," see instructions regarding required attachment.		☐ Yes ☒ No
26 Is the plan required to provide a Schedule of Active Participants? If "Yes," see instructions regarding required attachment.		☒ Yes ☐ No
27 If the plan is subject to alternative funding rules, enter applicable code and see instructions regarding attachment	27	

Part VII Reconciliation of Unpaid Minimum Required Contributions For Prior Years

28 Unpaid minimum required contributions for all prior years	28	0
29 Discounted employer contributions allocated toward unpaid minimum required contributions from prior years (line 19a)	29	0
30 Remaining amount of unpaid minimum required contributions (line 28 minus line 29)	30	0

Part VIII Minimum Required Contribution For Current Year

31 Target normal cost and excess assets (see instructions):			
a Target normal cost (line 6)		31a	12746057
b Excess assets, if applicable, but not greater than line 31a		31b	0
32 Amortization installments:		Outstanding Balance	Installment
a Net shortfall amortization installment		34331163	19916820
b Waiver amortization installment			0
33 If a waiver has been approved for this plan year, enter the date of the ruling letter granting the approval (Month _____ Day _____ Year _____) and the waived amount		33	0
34 Total funding requirement before reflecting carryover/prefunding balances (lines 31a - 31b + 32a + 32b - 33)		34	32662877
	Carryover balance	Prefunding balance	Total balance
35 Balances elected for use to offset funding requirement	0	32662877	32662877
36 Additional cash requirement (line 34 minus line 35)		36	0
37 Contributions allocated toward minimum required contribution for current year adjusted to valuation date (line 19c)		37	0
38 Present value of excess contributions for current year (see instructions)			
a Total (excess, if any, of line 37 over line 36)		38a	0
b Portion included in line 38a attributable to use of prefunding and funding standard carryover balances		38b	0
39 Unpaid minimum required contribution for current year (excess, if any, of line 36 over line 37)		39	0
40 Unpaid minimum required contributions for all years		40	0

Part IX Pension Funding Relief Under Pension Relief Act of 2010 (See Instructions)

41 If an election was made to use PRA 2010 funding relief for this plan:			
a Schedule elected		☐ 2 plus 7 years ☐ 15 years	
b Eligible plan year(s) for which the election in line 41a was made		☐ 2008 ☐ 2009 ☐ 2010 ☐ 2011	
42 Amount of acceleration adjustment		42	
43 Excess installment acceleration amount to be carried over to future plan years		43	

Schedule SB, line 22 — Description of Weighted Average Retirement Age

Each employee is assumed to retire in accordance with the table of retirement rates. The proportion of employees expected to retire at each potential retirement age is shown below. The average retirement age is 52.

Age	Age at retirement	Rates of withdrawal	Rates of retirement	Total rate	LX	Calculations # Ret or With	# Ret or With x age
30	50	0.1544	0.0000	0.1544	10,000	1,544	77,200
31	50	0.1452	0.0000	0.1452	8,456	1,228	61,391
32	50	0.1360	0.0000	0.1360	7,228	983	49,152
33	50	0.1284	0.0000	0.1284	6,245	802	40,094
34	50	0.1208	0.0000	0.1208	5,443	658	32,877
35	50	0.1132	0.0000	0.1132	4,786	542	27,087
36	50	0.1056	0.0000	0.1056	4,244	448	22,408
37	50	0.0980	0.0000	0.0980	3,796	372	18,600
38	50	0.0914	0.0000	0.0914	3,424	313	15,647
39	50	0.0848	0.0000	0.0848	3,111	264	13,190
40	50	0.0782	0.0000	0.0782	2,847	223	11,132
41	50	0.0716	0.0000	0.0716	2,624	188	9,396
42	50	0.0650	0.0000	0.0650	2,437	158	7,919
43	50	0.0604	0.0000	0.0604	2,278	138	6,880
44	50	0.0558	0.0000	0.0558	2,141	119	5,972
45	50	0.0512	0.0000	0.0512	2,021	103	5,174
46	50	0.0466	0.0000	0.0466	1,918	89	4,468
47	50	0.0420	0.0000	0.0420	1,828	77	3,839
48	50	0.0390	0.0000	0.0390	1,751	68	3,415
49	50	0.0360	0.0000	0.0360	1,683	61	3,030
50	50	0.0000	0.0200	0.0200	1,623	32	1,623
51	51	0.0000	0.0200	0.0200	1,590	32	1,622
52	52	0.0000	0.0200	0.0200	1,558	31	1,621
53	53	0.0000	0.0200	0.0200	1,527	31	1,619
54	54	0.0000	0.0200	0.0200	1,497	30	1,616
55	55	0.0000	0.0200	0.0200	1,467	29	1,613
56	56	0.0000	0.0200	0.0200	1,437	29	1,610
57	57	0.0000	0.0200	0.0200	1,409	28	1,606
58	58	0.0000	0.0200	0.0200	1,380	28	1,601
59	59	0.0000	0.0200	0.0200	1,353	27	1,596
60	60	0.0000	0.4000	0.4000	1,326	530	31,818
61	61	0.0000	0.0500	0.0500	795	40	2,426
62	62	0.0000	0.4000	0.4000	756	302	18,741
63	63	0.0000	0.0500	0.0500	453	23	1,428
64	64	0.0000	0.0500	0.0500	431	22	1,378
65	65	0.0000	0.4000	0.4000	409	164	10,639
66	66	0.0000	0.0500	0.0500	246	12	810
67	67	0.0000	0.0500	0.0500	233	12	781
68	68	0.0000	0.0500	0.0500	222	11	753
69	69	0.0000	0.0500	0.0500	211	11	726
70	70	0.0000	1.0000	1.0000	200	200	13,999
Total						10,000	518,499
Weighted average retirement age							52

Schedule SB, Part V — Summary of Plan Provisions***Benefits Included or Excluded***

Unless noted below, all benefits provided by the plan, as amended through Amendment 3, are included in this valuation.

- **Most recent plan amendments included:** Amendment 3 is included because it was adopted by the valuation date and is effective by the end of the plan year.
- **Plan amendments excluded:** None
- **Late retirement increases:**
 - *Active participants:* The plan provides benefit suspension notices to participants who work beyond normal retirement; therefore, late retirement actuarial increases only apply to participants who defer retirement beyond age 70½.
 - *Deferred vested participants:* Current deferred vested participants over normal retirement age are valued including the late retirement actuarial increase.
- **Internal Revenue Code limitations:** The limitations of Internal Revenue Code Section 415(b) and 401(a)(17) have been incorporated into our calculations.
- **IRC Section 416 rules for top-heavy plans:** We did not test whether this plan is top-heavy (when the present value of benefits for key employees equals or exceeds 60% of the present value for all participants). However, we expect that the plan is not top-heavy due to the large number of rank-and-file participants; therefore, the funding target and target normal cost do not reflect any liability for top-heavy benefit accruals.
- **IRC Section 436 benefit restrictions:**
 - *Unpredictable contingent event benefits:* This valuation excludes restricted contingent event benefits that occurred before the valuation date but includes contingent event benefits which are expected to occur on or after the valuation date regardless of anticipated funding-based limitations.
 - *Plan amendments:* See above.
 - *Prohibited payments:* Limitations on prohibited benefits (if any) are reflected for annuity starting dates before the valuation date but are ignored for annuity starting dates on or after the valuation date.
 - *Benefit accruals:* The plan's funding target does not reflect any limitation on benefit accruals. The target normal cost does not reflect any limitation on benefit accruals.
- **Unpredictable contingent event benefits:** The plan does not have any unpredictable contingent event benefits.

Schedule SB, Part V — Summary of Plan Provisions**Summary of Major Plan Provisions – The Rowan Pension Plan**

Effective date	The plan was amended and restated in its entirety effective July 1, 2009. The most recent amendment was signed on December 21, 2012. See the significant events below for details.
Plan year	Calendar year.
Status of the plan	The Rowan traditional plan service and benefit accrual is stopped as of July 1, 2009 due to the plan change described below to a cash balance benefit described in a later section (see "Summary of Rowan Cash Balance Formula Provisions"). New employees are eligible to participate in the plan once they satisfy the participation requirements. The LeTourneau RIP formula was frozen on December 31, 2010. All participants who were active in the LeTourneau RIP on June 22, 2011 had their service terminated on that date as a result of LeTourneau Technologies, Inc. being sold.
Significant events that occurred during the year	None.

Summary of Traditional Formula Provisions (Exhibit I)**Definitions**

• Employers participating	The employers participating in the plan include: Rowan Companies, Inc. Rowan Drilling Company, Inc. Rowan International, Inc. RDC Marine, Inc. Rowandrigill, Inc. Atlantic Maritime Services, Inc. Terminator, Inc. Rowan Petroleum, Inc.
• Eligibility	All employees who have been credited with at least 1,000 Hours of Service during the twelve calendar months following date of employment.
• Benefit service	A year of Benefit Service is credited for each year an employee works 2000 or more hours. Pro-rata credit is given for years an employee works less than 2000 hours.
• Vesting service	A year of Vesting Service is credited for each year an employee works 1000 hours or more. Both Benefit and Vesting Service prior to the Effective Date are determined under the terms of the Plan in effect prior to the Effective Date. Benefit and Vesting Service Commencement may also be affected by the Employer's adoption agreement.
• Considered compensation	Total compensation, excluding discretionary bonuses. In no event shall considered compensation exceed the §401(a)(17) limit.
• Pension compensation base	Average of the annual considered compensation of the five consecutive calendar years of the last ten completed calendar years of service which yields the highest average.

Schedule SB, Part V — Summary of Plan Provisions

Normal and late retirement	
• Eligibility	Age 60 with 3 years of vesting service.
• Benefit	A monthly amount payable for life with 60 payments certain equal to 1/12 of 1.75% of the Pension Compensation Base (disregarding any compensation by the employee after June 30, 2009) multiplied by the number of years of Benefit Service (disregarding any service completed after June 30, 2009).
Early retirement	
• Eligibility	Age 40 with 3 years of vesting service.
• Benefit	A monthly amount, deferred to age 60, calculated as for Normal Retirement considering compensation and service to the earlier of June 30, 2009 and the date of retirement. At the request of the employee, a reduced benefit may be paid at actual retirement, the reduction being 5% for each of the first 10 years of which payment precedes age 60 and actuarially reduced thereafter.
Disability retirement	
• Eligibility	Totally and permanently disabled at any time.
• Benefit	A monthly amount deferred to age 60, calculated as for Normal Retirement considering compensation and service to the earlier of June 30, 2009 and the date of the inception of his date of disability. If the total and permanent disability ceases prior to age 60, a reduced benefit may be paid starting at age 40. The reduction is the same as for Early Retirement.
Vested termination	
• Eligibility	3 years of vesting service.
• Benefit	A monthly amount deferred to age 60, calculated as for Normal Retirement considering compensation and service to the earlier of June 30, 2009 and the date of termination. At the employee's request, a reduced benefit may be paid starting at age 40. The reduction is the same as for early retirement.
Minimum severance benefit	Sum of an employee's total contributions prior to January 1, 1966, plus contributions made by the Company in the employee's name through January 1, 1976 plus interest at 2 1/2% through January 1, 1972, 4% through 1975, and at the rate required by IRS regulations thereafter.
Death benefit	
• Eligibility	Death after 3 years of vesting service.

Schedule SB, Part V — Summary of Plan Provisions

• Benefit	<p>The surviving spouse shall receive half of a 50% Joint & Survivor annuity payable monthly and calculated as for Normal Retirement considering compensation and service to the earlier of June 30, 2009 and the date of death. If the date of death is prior to age 60, a reduced benefit may be paid. The reduction is the same as for Early Retirement.</p> <p>If the participant has no surviving spouse, a monthly annuity shall be paid to his beneficiary for 60 months calculated as for Normal Retirement considering compensation and service to the earlier of June 30, 2009 and the date of death. If the date of death is prior to age 60, a reduced benefit may be paid. The reduction is the same as for Early Retirement.</p>
Form of benefits	
• Automatic form for unmarried participants	Life annuity with five years certain.
• Automatic form for married participants	<p>Qualified Joint and 50% Survivor Annuity. Under this option, a reduced amount, actuarially equivalent to the single participant form of payment, is paid to the married participant for his lifetime. Upon his death, his surviving spouse receives monthly payments equal to 50% of the original amount for life.</p>
• Optional forms	<p>Benefits payable for the life of the participant.</p> <p>Benefits payable for life with 25%, 75%, or 100% of the benefit continuing to the joint annuitant following the death of the participant.</p> <p>Benefits payable for the life of the participant with 5, 10 or 15 years certain.</p> <p>Level income option: benefits are adjusted to enable the participant to receive from the Plan and the Social Security Act a level amount for life.</p> <p>Lump sum benefit payable if present value of Rowan traditional benefit is less than \$25,000. The COLA is assumed to be 1.75% for this purpose.</p>
• Actuarial equivalence	<p><u>Level income option and lump sum option:</u></p> <p>The mortality table prescribed in Section 430(h)(3) and in effect at the time of payment with segment rates pursuant to Section 417(3)(c) with a 2 month look-back.</p> <p><u>All other forms of payment:</u></p> <p>The UP-1984 Mortality Table set forward one year using an 8.50% interest rate.</p>
• Cost-of-living adjustment	<p>On January 1 of each year, all pensions being paid will be adjusted to reflect the change in the Consumer Price Index. The adjustment for any year will be limited to 2% per annum and will not be effective until the recipient reaches age 50.</p>
• Expenses	Paid by the trust if not by the employer.
Miscellaneous	
• Maximum compensation	<p>Compensation for any 12-month period used to determine accrued benefits may not exceed the limits in IRC Section 401(a)(17) for the calendar year in which the 12-month period begins. This limit is indexed annually. For 2014, the limit is \$260,000.</p>

Schedule SB, Part V — Summary of Plan Provisions

- | | |
|--------------------|---|
| • Maximum benefits | Annual benefits may not exceed the limits in IRC Section 415. This limit is indexed annually. For 2014, the limit is \$210,000. |
|--------------------|---|

Summary of Rowan Cash Balance Formula Provisions**Definitions**

- | | |
|---------------------------|---|
| • Eligibility | All employees who have been credited with at least 1,000 hours of service during the twelve calendar months following date of employment provided any participant in The Rowan Pension Plan as of June 30, 2009 shall become a participant on the effective date. |
| • Compensation | W-2 compensation, excluding stock options or other fringe benefits. In no event shall compensation exceed the §401(a)(17) limit. |
| • Vesting service | Same as traditional plan. |
| • Transition participants | Participants of The Rowan Pension Plan on June 30, 2009 who were accruing benefits under the traditional formula. |
| • Pay credits | 5% compensation plus transition pay credits for Transition participants based on the following schedule: |

Points	Percentage
Under 50	0%
50 – 59	3%
60 – 69	6%
70 – 79	9%
80 or more	12%

One point is credited for each year of a Transition participant's attained age at June 30, 2009, plus one point is credited for each full year of a Transition participant's Vesting Service at June 30, 2009.

Pay credits are added to the Cash Balance Account annually.

- | | |
|------------------------------|---|
| • Interest credit | Interest on the Cash Balance Account as of the end of each prior calendar quarter is added to the Cash Balance Account each calendar quarter. The rate credited is based on the 10-year U.S. Treasury notes in November of the preceding plan year. |
| • Cash balance account | The sum of pay credits and interest credits credited to date of determination. |
| • Participant contributions | None allowed. |
| • Actuarial equivalence | <u>All forms of payment:</u>
The mortality table prescribed in Section 430(h)(3) and in effect at the time of payment with segment rates pursuant to Section 417(3)(c) with a 2 month look-back. |
| • Cost of living supplements | None |

Normal retirement benefits

- | | |
|---------------|---|
| • Eligibility | Age 60 with 3 years of Vesting Service. |
| • Benefit | Lump sum equal to Cash Balance Account at time of payment or monthly amount actuarially equivalent to such balance. |

Schedule SB, Part V — Summary of Plan Provisions

Severance benefit	
• Eligibility	3 years of Vesting Service
• Benefit	Same as retirement at Normal Retirement Date, based on Cash Balance Account at commencement date.
Death with survivor benefit	The beneficiary of a deceased member of the plan may choose to receive the member's entire Cash Balance Account as a lump sum or as a monthly single life annuity.
Forms of benefit	
• Automatic form for unmarried participants	Life annuity
• Automatic form for married participants	50% Joint and Survivor Annuity
• Optional forms	Optional forms of payment are lump sum, single life annuity and joint and survivor (50% and 75%).
Miscellaneous	
• Maximum compensation	Compensation for any 12-month period used to determine accrued benefits may not exceed the limits in IRC Section 401(a)(17) for the calendar year in which the 12-month period begins. This limit is indexed annually. For 2014, the limit is \$260,000.
• Maximum benefits	Annual benefits may not exceed the limits in IRC Section 415. This limit is indexed annually. For 2014, the limit is \$210,000.

Summary of LeTourneau Technologies, Inc. Retirement Income Plan Provisions (Exhibit II)

Definitions	
• Eligible employees	Any Employee of the Company excluding (i) members of a collective bargaining unit, unless there is a collective bargaining agreement providing for participation of such Employees in the Plan, (ii) non-resident aliens not on the U.S. payroll, (iii) leased employees, (iv) consultants, and (v) independent contractors.
• Eligibility	Each Transferred Member became a Member of the Plan as of the Effective Date. Any other Eligible Employee shall become a Member upon the January 1 or July 1, following one year of participation service and age 21. The plan was frozen to new Members as of December 31, 2010.
• Employer contributions	Payments to be made in such amounts as determined from time to time by the employer.
• Participant contributions	None required or permitted.

Schedule SB, Part V — Summary of Plan Provisions

• Vesting service	<p><u>After the Effective Date:</u> A Member shall be credited with one year of Vesting Service for each Plan Year in which he completes 1,000 or more Hours of Service.</p> <p><u>Before the Effective Date:</u> The Member will be credited with service as of the Effective Date determined under the terms of the General Cable Corporation Master Pension Plan.</p>
• Accrual service	<p><u>After the Effective Date:</u> For each Plan Year during which a Member works 1,000 or more hours he shall be credited with one year of Accrual Service. Pro rata credit will be given for years in which an employee works less than 1,000 hours.</p> <p><u>Before the Effective Date:</u> Same as vesting service. Benefit accruals under the plan were frozen as of December 31, 2010.</p>
• Average annual compensation	The five consecutive calendar years of employment with the Company and Controlled Entities which yield the highest average compensation.
• Pensionable earnings	The total of all base salary, overtime and bonuses paid by the Company or a Controlled Entity, including all amounts that would have been paid had the Employee not elected a reduction under section 125 or 401(k) of the Code. Covered Compensation for a plan year will not exceed the limits of IRC Section 401(a)(17).
• Primary Social Security benefit	The estimated amount of monthly benefit which will be provided by Social Security. The amount is equal to the “primary insurance amount” at age 65.
• Actuarial equivalence	<p>Lump sum option: The mortality table prescribed by Section 430(h)(3) and in effect at the time of payment with segment rates pursuant to Section 417(e)(3)(c) with a 2 month look-back.</p> <p>All other forms of payment: The UP-1984 Mortality Table using an 8.00% interest rate.</p>
Normal retirement	
• Eligibility	Age 65 with 5 years of service.

Schedule SB, Part V — Summary of Plan Provisions

• Benefit	<p>The monthly amount of benefit, payable monthly for life, is equal to:</p> <p>(1) For Transferred Members who had not withdrawn their contributions with interest, the sum of A, B and C.</p> <p>(2) For Transferred Members who had withdrawn their contributions with interest, the sum of C and the greater of A and B.</p> <p>(3) For all other Members, the sum of B and C below:</p> <p>(a) Monthly accrued benefit as of December 31, 1981 determined under the terms of the General Cable Corporation Master Pension Plan.</p> <p>(b) 1% of his Average Monthly Compensation minus 1% of his Social Security Benefit, multiplied by his years of Accrual Service prior to January 1, 1982.</p> <p>(c) 1% of his Average Monthly Compensation minus 1% of his Social Security Benefit, multiplied by his years of Accrual Service from and after January 1, 1982.</p> <p>Benefit accruals under the plan were frozen as of December 31, 2010.</p>
Early retirement	
• Eligibility	Age 55 and 5 years of Vesting Service.
• Benefit	The benefit, deferred to age 65, is determined as for normal retirement considering compensation and service to early retirement date. If the benefit commences prior to age 65, the benefit is reduced by 1/2% for each month the benefit begins before age 65.
Deferred vested	
• Eligibility	5 years of Vesting Service.
• Benefit	Calculated in the same manner as an Early Retirement Benefit.
Disability	
• Eligibility	Total and Permanent Disability before Normal Retirement Date
• Benefit	<p>Employee's covered by LTD: A benefit commencing at Normal Retirement Date (or earlier date that LTD benefits cease) based on service and pay as if the employee had remained employed throughout the time he was on LTD.</p> <p>Employee's not covered by LTD: A benefit commencing 6 months after disability based on service and pay to date of disability. If a participant was under age 55 or had less than ten years of service when he became disabled, the benefit will be payable only through his Normal Retirement Date.</p>
Death benefit	
• Eligibility	5 years of Vesting Service.
• Benefit	50% of the reduced Joint and Survivor Benefit based on the accrued benefit at date of death (or earlier termination) payable at the later of death or age 55.

Schedule SB, Part V — Summary of Plan Provisions

Form of benefits	
• Automatic form for unmarried participants	The normal form of benefit payment is for the life of the participant.
• Automatic form for married participants	An actuarially equivalent qualified joint and survivor annuity is paid.
• Optional forms	Benefit payable for life with 120 monthly payments guaranteed Benefit payable for life with 50%, 75%, or 100% of the benefit continuing to the joint annuitant following the death of the participant. Lump sum if value is less than \$100,000. An automatic lump sum payment if the value is less than \$5,000, and has never exceeded \$5,000.
Miscellaneous	
• Maximum compensation	Compensation for any 12-month period used to determine accrued benefits may not exceed the limits in IRC Section 401(a)(17) for the calendar year in which the 12-month period begins. This limit is indexed annually. For 2014, the limit is \$260,000.
• Maximum benefits	Annual benefits may not exceed the limits in IRC Section 415. This limit is indexed annually. For 2014, the limit is \$210,000.

Plan Provision Changes Since Prior Valuation

- Maximum compensation amounts and maximum benefit amounts under IRS rules were updated from 2013 to 2014.

ROWAN PENSION PLAN
EIN: 75-0759420 Plan Number: 001

Form 5500 Schedule H, Line 4i
Schedule of Assets (Held at End of Year)

December 31, 2014

[a] Party- in- interest	[b] Identity of Issue, Borrower, Lessor or Similar Party	[c] Description of Investment including Maturity Date, Rate of Interest, Collateral, Par or Maturity Value	[d] Cost	[e] Current Value
	AQR INTERNATIONAL SMALL CAP EQUITY TRUST	PARTNERSHIP/JOINT VENTURE INTERESTS	\$ 23,000,000	\$ 29,736,403
	CENTERSQUARE EB GLOBAL REAL ESTATE SECURITIES	PARTNERSHIP/JOINT VENTURE INTERESTS	15,238,227	19,069,748
	UBS TRUMBULL PROPERTY FUND (TPF)	PARTNERSHIP/JOINT VENTURE INTERESTS	18,743,931	26,687,855
	SSGA RUSSELL 2000 INDEX NL FUND	COMMON/COLLECTIVE TRUSTS	36,284,590	38,106,325
	SSGA MSCI ACWI EX USA NON-LENDING FUND	COMMON/COLLECTIVE TRUSTS	129,688,900	135,946,656
	SSGA S&P 500 FLAGSHIP NON-LENDING FUND	COMMON/COLLECTIVE TRUSTS	129,316,517	159,540,695
	SSGA U.S. AGGREGATE BOND INDEX NON-LENDI	COMMON/COLLECTIVE TRUSTS	80,044,899	85,412,133
*	JPMORGAN 100% US TREAS SEC MMKT FUND AGE	MONEY MARKET FUND	8,327,511	8,327,511
	WESTERN ASSET FUND INC CORE PLUS BOND IS	REGISTERED INVESTMENT COMPANIES	78,132,197	86,324,934
	OTHER ASSETS	RIGHTS, WARRANTS AND SUBSCRIPTIONS	4,460	88,635
Total Plan investments at fair value				<u>\$ 589,240,895</u>

* - Denotes party-in-interest

Schedule SB, line 32 — Schedule of Amortization Bases

The total shortfall amortization charge is the sum of the individual shortfall amortization installment for each plan year covered under PPA. Although an individual shortfall amortization installment can be negative, the combined shortfall amortization charge cannot be less than \$0.

Shortfall bases				
Year established		Outstanding balance	Years remaining	2014 Installment
2008	\$	14,864,204	1	\$ 14,864,204
2009		(1,471,215)	2	(753,515)
2010		11,142,049	3	3,896,271
2011		18,504,937	4	4,969,436
2012		(39,158,316)	5	(8,612,337)
2013		20,825,586	6	3,942,112
2014		9,623,918	7	1,610,649
Total	\$	34,331,163		\$ 19,916,820

Schedule SB, line 24 — Change in Actuarial Assumptions

Actuarial Assumption Changes Since Prior Valuation

Funding

- The expense component of normal cost decreased from \$2,211,568 to \$2,043,373 to reflect our expectations for the current plan year.
- Interest discounts and mortality table were updated from 2013 to 2014 in accordance with PPA, MAP-21, and HATFA.