Instruction 1(b).

## FORM 4

Check this box if no longer subject to Section 16. Form 4 or Form 5 obligations may continue. See

UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Washington, D.C. 20549

OMB APPROVAL

| OMB Number:              | 3235-0287 |  |  |  |  |  |  |
|--------------------------|-----------|--|--|--|--|--|--|
| Estimated average burden |           |  |  |  |  |  |  |
| hours per response       | : 0.5     |  |  |  |  |  |  |

STATEMENT OF CHANGES IN BENEFICIAL OWNERSHIP

Filed pursuant to Section 16(a) of the Securities Exchange Act of 1934 or Section 30(h) of the Investment Company Act of 1940

| 1. Name and Address of Reporting Person*   |                     |          |             | suer Name <b>and</b> Tic<br><u>nsocean Ltd.</u>          | 0              | Symbol                     | 5. Relationship of Reporting Person(s) to Issuer (Check all applicable) |   |           |                     |        |  |
|--|---------------------|----------|-------------|--|----------------|----------------------------|---|---|-----------|---------------------|--------|--|
| Perestro   | <u>Perestroika</u>  |          |             |  |                |                            | X   | Director  | X 1       | 0% Owne             | er     |  |
| (Last)<br>TURMST   | (First)<br>RASSE 30 | (Middle) |             | ate of Earliest Trans<br>3/2022                          | saction (Month | /Day/Year)                 |   | Officer (give title below)                            |           | Other (spe<br>elow) | ⊧cify  |  |
|  |                     |          | 4. lf /     | 4. If Amendment, Date of Original Filed (Month/Day/Year) |                |                            |   | 6. Individual or Joint/Group Filing (Check Applicable |           |                     |        |  |
| (Street)<br>STEINHAUSEN V8 6312  |                     |          |             |  |                |                            | Line)   | Form filed by On<br>Form filed by Mo<br>Person        | •         | 0                   |        |  |
| (City)   | (State)             | (Zip)    |             |  |                |                            |   | Person  |           |                     |        |  |
| Table I - Non-Derivative Securities Acquired, Disposed of, or Beneficially Owned |                     |          |             |  |                |                            |   |   |           |                     |        |  |
| 1. Title of Security (Instr. 3) 2. Transact                                      |                     |          | Transaction | 2A. Deemed   | 3.             | 4. Securities Acquired (A) |   | 5. Amount of  | 6. Owners |                     | Nature |  |

|                   | Date<br>(Month/Day/Year) | Execution Date,<br>if any<br>(Month/Day/Year) | Code (Instr. |   | n Disposed Of (D) (Instr. 3, 4 an<br>r. 5) |               |                              |                                    |                         | of Indirect<br>Beneficial<br>Ownership<br>(Instr. 4) |
|-------------------|--------------------------|---|--------------|---|--|---------------|------------------------------|------------------------------------|-------------------------|--|
|                   |                          |   | Code         | v | Amount                                     | (A) or<br>(D) | Price                        | Transaction(s)<br>(Instr. 3 and 4) |                         | (1150. 4)  |
| Registered Shares | 05/13/2022               |   | Р            |   | 2,000,000                                  | A             | <b>\$3.75</b> <sup>(1)</sup> | 82,636,646                         | <b>D</b> <sup>(2)</sup> |  |

Table II - Derivative Securities Acquired, Disposed of, or Beneficially Owned (e.g., puts, calls, warrants, options, convertible securities)

|   |   |  |   |                              |   |  |   | -                   |                        |       |  | -  |  |  |  |
|---|---|--|---|------------------------------|---|--|---|---------------------|------------------------|-------|--|--|--|--|--|
| 1. Title of<br>Derivative<br>Security<br>(Instr. 3) | 2.<br>Conversion<br>or Exercise<br>Price of<br>Derivative<br>Security | 3. Transaction<br>Date<br>(Month/Day/Year) | 3A. Deemed<br>Execution Date,<br>if any<br>(Month/Day/Year) | 4.<br>Transa<br>Code (<br>8) |   | of<br>Deriv<br>Secu<br>Acqu<br>(A) o<br>Dispe<br>of (D | erivative (Month/Day/Year)<br>acurities<br>coquired<br>) or<br>(p)<br>(c)<br>sposed<br>(c)<br>str. 3, 4 |                     | iration Date Amount of |       |  | Amount of<br>Becurities<br>Jnderlying<br>Derivative<br>Security (Instr. 5)<br>Beneficially<br>Owned<br>Following<br>Reported<br>Transaction(s)<br>(Instr. 4) |  |  | 11. Nature<br>of Indirect<br>Beneficial<br>Ownership<br>(Instr. 4) |
|   |   |  |   | Code                         | v | (A)  | (D)   | Date<br>Exercisable | Expiration<br>Date     | Title | Amount<br>or<br>Number<br>of<br>Shares |  |  |  |  |

## Explanation of Responses:

1. The price reported in Column 4 is a weighted average price. These shares were purchased in multiple transactions at prices ranging from \$3.55 to \$3.85, inclusive. The reporting person undertakes to provide Transocean Ltd. (the "Company"), any security holder of the Company, or the staff of the Securities and Exchange Commission, upon request, full information regarding the number of shares purchased at each separate price within the ranges set forth in this footnote (1) to this Form 4.

2. These securities are held directly by Perestroika AS. Mr. Frederik Mohn is a sole director and owner of Perestroika AS and is the beneficial owner of all securities owned by Perestroika AS. Remarks:

Perestroika (Cyprus) Ltd. is a wholly owned subsidiary of Perestroika AS. Due to Perestroika (Cyprus) Ltd.'s designation of a member of the board of directors of the Company, each of Perestroika (Cyprus) Ltd. and Perestroika AS, as its sole owner, may be deemed to be a director of the Company by deputization.

| /s/ Daniel Ro-Trock By Power | 05/17/2022 |  |
|------------------------------|------------|--|
| of Attorney                  | 05/1//2022 |  |

\*\* Signature of Reporting Person Date

Reminder: Report on a separate line for each class of securities beneficially owned directly or indirectly.

\* If the form is filed by more than one reporting person, see Instruction 4 (b)(v).

\*\* Intentional misstatements or omissions of facts constitute Federal Criminal Violations See 18 U.S.C. 1001 and 15 U.S.C. 78ff(a).

Note: File three copies of this Form, one of which must be manually signed. If space is insufficient, see Instruction 6 for procedure.

Persons who respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB Number.