# The Blue Print in Action

# Our Code of Conduct

For more detail, refer to www.integrity.slb.com

Schlumberger

September 2019

# The Blue Print in Action

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The Blue Print in Action applies to everyone at Schlumberger and, together with other Schlumberger requirements, should help answer most business ethics questions. If you are still not sure what to do, ask for help.

All employees should speak openly and ask questions about the Blue Print in Action or any other Schlumberger requirements without fear of retaliation.

# Our History and Culture

#### In the Beginning

Schlumberger was founded at the crossroads of innovation and technology. In the early 1900s, Conrad and Marcel Schlumberger built the company upon the first method to simultaneously detect metal ores underneath the earth's surface and reveal features about the subsurface structure. This original innovation allowed the brothers to grow Schlumberger into the world's first well logging company.

The company quickly developed international roots and a worldwide presence, becoming the leading provider of subsurface surveys. Today Schlumberger is the world's largest oilfield services provider, with employees representing over 140 nationalities.

#### **Growth through Technology**

The company is faithful to its legacy of technological innovation. After initially leading the industry with its subsurface survey methods, we now offer a broad portfolio of leading technologies to meet the needs of our customers in the oil and gas industry—ranging from well testing and directional drilling to software and information management. Schlumberger has grown both organically and through outside acquisitions. Along with new technologies and opportunities, each acquired company has brought its own history, values and principles. Our openness to change has provided the framework for the integration of these companies and enabled us to strengthen many key Schlumberger beliefs.

#### **Global Commitment to R&D**

Over the course of the last century, we refined our technologies to help our customers improve their industry performance. Our unrivaled commitment to R&D gives us the resources and expertise required to meet the challenges now facing the oil and gas industry.

#### **Building on Core Strengths**

Today Schlumberger is a global oilfield technology, project management and information solutions company. We are committed to providing services and products that enhance our customers' performance. Our value lies in our global culture, our deep understanding of customer processes, and our extensive experience in developing and deploying innovative technology solutions.

Knowledge, technological innovation and a truly global workforce remain the symbols of Schlumberger today.

# **Our Values**

As Schlumberger employees, we pride ourselves on upholding our three long-established values, which will guide the decisions we make as we pursue our ambitions:

### People

Our people thrive on the challenge to excel in any environment and their dedication to safety and customer service worldwide is our greatest strength.

### Technology

Our commitment to technology and quality is the basis for our competitive advantage.

### Profit

Our determination to produce superior profits is the cornerstone for our future independence of action and growth.

# Our Mindset

Our Mindset summarizes the behavior expected of every Schlumberger team member, including attitude, words and actions, as we interact with each other and with our external stakeholders.

Understand and support the direction ahead. Make a difference.

- Service focus
- Continuous improvement
- Self-development

Take action and have a positive impact on performance. Achieve excellence.

- Creativity
- Initiative
- Adaptability
- Results focus



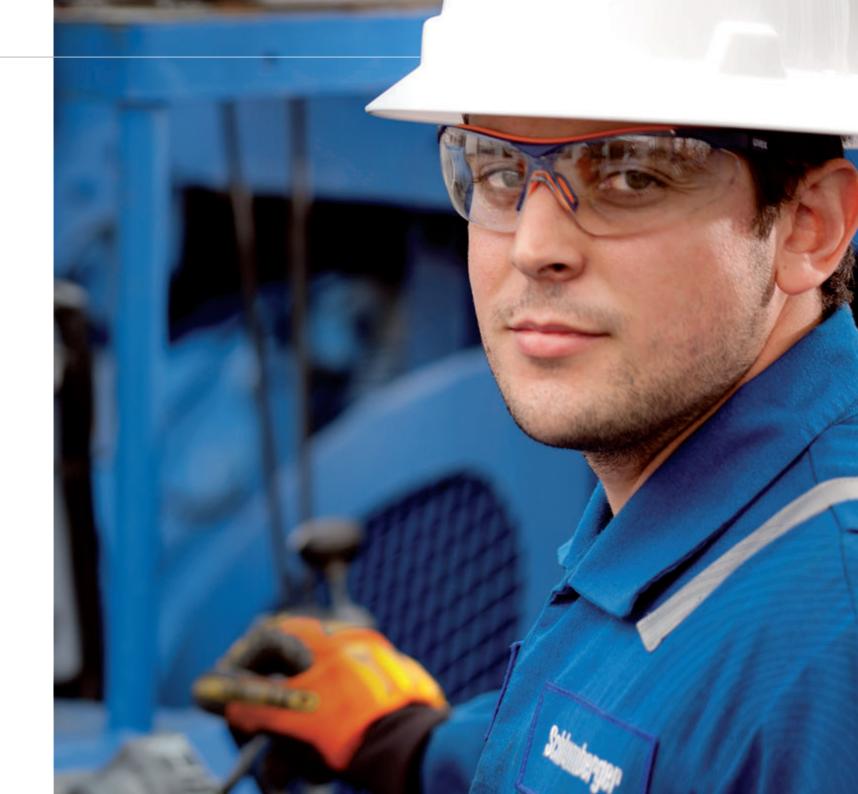
Recognize the boundaries and have the courage to act honestly and responsibly. Do the right thing.

- Decision-making
- Responsibility

Trust others to do their part and work together toward common goals. Help the team succeed.

- Collaboration
- Communication
- Coaching and mentoring
- Diversity

# My Actions Reflect On the Company





# Our Mindset Guides My Actions

#### In Brief

- I take it upon myself to know and obey the laws where the company operates.
- I do not engage in actions unless I am sure they are ethical and legal.
- I ask questions and raise concerns when issues arise and I report internally any actual or potential violation, without fear of retaliation.
- I am committed to our customers, treating them in a consistent and transparent way, and avoiding purchase of customer stock, except through mutual funds.

#### **Demonstrating Integrity**

Acting ethically involves more than simply ensuring compliance with laws and regulations. It involves recognition that our decisions affect others. By keeping this in mind, we earn the respect, trust and confidence of our customers, colleagues, shareholders and others affected by our operations.

By doing things right the first time, every time, we enhance our reputation for integrity with these stakeholders.

Individually, we are all responsible for adhering to the Blue Print in Action and to the internal requirements governing our work. If you are in a leadership position, you must demonstrate integrity by living the Blue Print in Action, and by communicating it to your team members to ensure that they do, too.

#### **Commitment to Accountability**

If we intentionally or unintentionally violate the rules, we could be subject to disciplinary action. We could also face personal financial or criminal liability if we violate applicable laws. Schlumberger has adopted progressive accountability guidelines as a fair and consistent system for assessing the actions of individuals who violate the rules.

Any waiver or exception to the rules of the Blue Print in Action must be approved according to Schlumberger requirements. If no standard applies, the Schlumberger Limited director of compliance must approve the waiver or exception. The board of directors of Schlumberger Limited must approve any waiver or exception for executive officers or directors.

#### **Reporting a Concern or Violation**

If you know of or suspect a violation of the Blue Print in Action or applicable laws, you must report it internally.

Your first point of contact should be your direct or functional manager. If this is not practical, you may contact a manager in Personnel, Legal, Finance or another relevant function, or contact the Schlumberger Limited director of compliance. In addition, you can raise your concern by using the QUEST Event Report feature or the EthicsLine, which provides two methods of reporting, via telephone (888-884-8849) or online (www.slbethics.ethicspoint.com). For calls outside North America, it may be necessary to first dial a country access number that can also be found at the above link. Any employee who fails to report or provide further information about a violation will be subject to disciplinary action.

#### **No Retaliation**

Schlumberger prohibits retaliation for good faith reporting of a potential or actual violation of the Blue Print in Action, our internal requirements or applicable laws. However, any employee who intentionally reports false information will be subject to disciplinary action.

#### **Commitment to Customers**

Schlumberger is committed to delivering excellence to our customers in everything we do. We treat all our customers in a consistent and transparent way. Similarly, Schlumberger employees, officers and directors may not purchase stock in companies that are customers of Schlumberger, other than as part of a mutual fund.

#### **Dealing with Suppliers**

Schlumberger maintains zero tolerance for corruption of any kind, and we expect the same from our contractors, suppliers, and agents. They are required to comply with the laws of the countries in which they operate, and to act in a socially responsible and ethical manner, consistent with The Blue Print in Action. All suppliers, contractors, and agents must be approved and managed in accordance with internal requirements.

Finally, we have always supported responsible sourcing of materials from suppliers that share our values, and we commit to avoid using conflict minerals in our sourcing activities.

#### **Dealing with International Differences**

Schlumberger employees deliver highquality technology and services worldwide, and we are subject to the laws and customs of different countries. Sometimes these laws vary from place to place and could even conflict.

We are responsible for knowing and following the laws and regulations that apply where we work. When local laws or common practices are not as strict, the Blue Print in Action and other Schlumberger requirements still apply.

# Commitment to Health, Safety and Protection of the Environment is the Platform for Our Success

#### In Brief

- I do not perform a job without proper training and personal protective equipment or while impaired by alcohol, drugs or controlled substances.
- I stop any job at any time if I believe conditions are unsafe.
- I always wear seat belts and I do not use mobile phones or electronic devices while driving.
- I minimize our environmental impact by preventing pollution and minimizing waste.

### Q

What are my options if I feel my working conditions are unsafe?

### A

You may stop any job immediately if you feel conditions are unsafe. You should also immediately report any unsafe conduct to a supervisor.

#### An Unwavering Commitment to HSE

Our company is determined to safeguard people's health and security, operate the business safely and protect the environment.

#### Working Safely

A safe and productive work environment is one that is free from the harmful effects of alcohol, controlled substances and legal or illegal drugs. We are prohibited from entering Schlumberger facilities, conducting company business and driving or operating equipment while impaired by alcohol, drugs or controlled substances or while in possession of these substances illegally or without authorization.

We must be proactive about our safety and that of our team members. Wear all personal protective equipment required by the job at hand. Do not perform a job without proper training. Stop any job at any time if conditions are unsafe and immediately report any unsafe conduct to a supervisor. Driving is the riskiest activity at Schlumberger. All employees whose jobs involve driving must comply with journey management and specific safe-driving requirements. Schlumberger mandates that all vehicle occupants wear seatbelts. Driving under the influence of drugs or alcohol is not permitted. Use of mobile phones or electronic devices while driving is not permitted—even if the device is handsfree. The driver must bring the vehicle to a complete stop before using any such device.

#### **Protecting the Environment**

Schlumberger is committed to minimizing its impact on the environment. We do this by preventing pollution, reducing emissions, consuming fewer natural resources and minimizing waste.

## Commitment to Quality Delivers Excellence

#### In Brief

- I aim to do the right thing the first time, every time.
- I strive to exceed customer expectations.
- I respond to customer requests in a timely and appropriate manner.
- I pursue every opportunity for continuous improvement.

The long-term business success of Schlumberger depends on continuous improvement in the quality of our products and the delivery of services to our customers. Quality means that every employee commits to doing the job right the first time, every time. We demonstrate our commitment to quality by meeting or exceeding customer expectations and by avoiding nonconformities in our daily activities.

To help make continuous quality improvements, we should participate in any audits and periodic assessments the company requires. We can also help to improve quality by addressing customer feedback in a timely and appropriate manner.



# Avoiding Conflict of Interest Shows Commitment

#### In Brief

- I do not hold financial stakes in companies that do business with Schlumberger.
- I put Schlumberger business interests first, and do not accept any improper personal benefit as a result of my position.
- I do not use company resources, funds or equipment for personal gain.
- I disclose all potential conflicts of interest to my manager.

A conflict of interest is a conflict between our personal interests and the interests of Schlumberger or a customer. A conflict may arise if we have personal, social, financial, political or other interests that could interfere with our responsibilities as Schlumberger employees. For example:

- If a family member works in an organization that competes with Schlumberger
- If we have an active interest in an organization that does business with Schlumberger, including customers or suppliers

- I f an employee serves as a director, officer, agent or consultant of a company that competes with Schlumberger
- If the company grants a personal loan to an employee

Employees must put Schlumberger business interests first, disclose all conflicts and avoid situations that create the appearance of a conflict of interest. Advance written approval is required before an employee can continue working while a conflict of interest exists.

### 0

My wife works for a Schlumberger supplier. Can I recommend her company's bid over two others we are considering?

### Α

No. A relationship conflict of interest such as this must be disclosed to your supervisor and you must recuse yourself from the decision-making process.

# Transparent Stock Transactions Support Integrity

#### In Brief

- I ensure that all non-public information to which I have access through my work remains confidential.
- I do not buy or sell stocks or securities of Schlumberger or other companies based on non-public or insider knowledge.
- I do not provide insider information to others, either inside or outside the company, for them to buy or sell stock or securities.
- I avoid even the appearance of using insider information improperly.

In the course of our work, we may have access to non-public or insider information that relates to Schlumberger or its financial position. Examples include knowledge of unannounced marketing plans, new product releases, financial results, changes in dividends or earnings, planned mergers or acquisitions, and business strategies. If we have such information, we must keep it confidential and we may not buy or sell Schlumberger Limited stock or publicly traded options of Schlumberger stock until the information becomes public.

It can also be illegal to provide non- public information to someone else for them to buy or sell stock or other securities, even if we ourselves do not gain financially.

This prohibition also applies to buying and selling the stock or options of other companies with which Schlumberger does business.



# Good Judgement about Business Entertainment Builds Positive Relationships

#### In Brief

- I do not offer or accept any business gift or hospitality of more than nominal value (200 USD or any lower limit specified locally).
- I use good judgment when giving or receiving business gifts or hospitality and never use them with the intention of influencing business decisions.
- I recognize and respect our customers' policies regarding gifts and hospitality.
- I always ask my manager if I am unsure whether a particular gift or type of entertainment is appropriate.

Accepting or giving business gifts or hospitality must never suggest an ability to influence business decisions. Gifts are items or benefits for which the recipient does not pay fair market value. Hospitality includes meals, entertainment and sporting events.

We must not offer or accept any gift or hospitality of more than nominal value (defined as 200 USD or any lower limit specified locally) to or from any individual or organization that does or seeks to do business with Schlumberger.

### Q

Apart from its monetary value, is there anything else I should consider before giving or receiving a business gift?

#### Α

Yes. While the amount should be below nominal value (200 USD) or properly approved if above that amount, other factors are equally important.

You should be sure that any proposed business gift is not made too frequently, intended to influence a decision or made while a decision is pending.



# Our Company Is the Sum of Our Actions









# Fair and Open Business Practices Represent Who We Are

#### In Brief

- We have zero tolerance for corruption and no employee may offer or accept bribes in any form (including Facilitation Payments).
- We do not use company funds or assets for political purposes.
- We may engage in direct dialogue with public policy decision makers but we do not use lobbyists or seek to bring about a particular outcome or decision.

#### **Bribery and Corruption**

We do not obtain a business advantage through bribery, improper payments or any other illegal means. Schlumberger has zero tolerance for corruption. The direct or indirect offer, payment, solicitation or acceptance of bribes in any form is strictly prohibited.

We must never give or receive any kind of bribe or hidden payment to:

- influence someone's judgment about our products and services
- gain improper advantage when selling our goods and services
- influence a government official's use of discretionary authority

#### **Government Officials**

Payments to government officials are forbidden. The term "government official" includes officers or employees of any branch of government, the immediate family members of such an official, political candidates, and officers or employees of any corporation owned or controlled by the government, including national oil companies.

Direct payments are prohibited, as are offers of payment, payments made through third parties (such as agents) and reimbursements of payments that we or someone else may have made personally.

#### Schlumberger Does Not Engage In Political Activity

Schlumberger is politically neutral and does not make political contributions. We may not use company funds or assets for political purposes.

With respect to public policy matters affecting the company and its shareholders, Schlumberger may engage in a direct dialogue with decision makers but does not use paid lobbyists or seek to bring about a particular outcome or decision.

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#### In Brief

- We compete aggressively but fairly.
- We do not win business or maintain customer relationships by acting illegally or unethically.
- We do not enter into agreements that can restrict full and fair competition.
- We do not share pricing or bidding information with competitors or anyone outside of Schlumberger.

#### An Honest and Open Approach

Schlumberger competes aggressively but fairly. We do not win business or maintain customer relationships by acting illegally or unethically. Each of us must deal fairly and openly with customers, suppliers and competitors.

#### **Promoting Full and Fair Competition**

As Schlumberger employees, we must not take unfair advantage of a business situation through abuse of confidential information, misrepresenting material facts or deliberately doing anything that may be viewed as unfair. Any kind of agreement or understanding with our competitors to restrict full and fair competition is prohibited. This means we cannot enter into agreements that fix or control prices; allocate products, markets or territories; or limit the manufacture, sale or production of any product or the provision of any service. Whenever we are involved in trade association activities or in other situations where there is communication among competitors, customers or suppliers, we must be especially alert to ethical and legal requirements.

### 0

A friend works at a competitor. We will both be attending an upcoming trade association meeting, so I'm going to request that we are seated at the same lunch table for both days.

Is this OK?

### A

Yes. However, at trade association meetings and similar functions one should be careful to avoid any appearance of impropriety when interacting with competitors. So, at your lunch you should avoid discussing Schlumberger or the competitor's business matters because this may create the appearance of improper collaboration.

# Our Relationships with Other Demonstrate Respect

#### In Brief

- We encourage fair employment and offer equal opportunity.
- We do not tolerate harassment or other offensive behavior.
- We recruit, hire and train where we work, and we comply with local content rules.
- We promote health and education in local communities.

#### **Embracing Diversity and Equality**

One of our company's strengths is the diversity of our workforce. Employees of many nationalities and backgrounds work together to achieve common objectives. As a global company, we encourage fair employment practices and offer equal opportunities to all our employees.

Schlumberger obeys the employment laws of the countries in which it operates and does not engage in discrimination based on race, color, gender, age, sexual orientation, ethnicity, disability, religion, union membership, or marital status in hiring and employment practices such as promotions, rewards, and access to training.

#### **Working Together with Mutual Respect**

Schlumberger employees are expected to treat one another professionally and with mutual respect. Schlumberger employees must also display respect when interacting with customers, contractors and others affected by our operations. Schlumberger does not tolerate any form of harassment or other offensive action.

# Our Community Relationships Build On Our Mindset

### Contributing to Development and Communities Worldwide

Schlumberger employees represent more than 140 nationalities and live and work in approximately 85 countries worldwide. We foster economic development by recruiting, hiring, and training where we work; promoting from within; and by complying with international labor standards and local content rules.

In addition, we contribute to the social development and well-being of these communities by actively advancing education and health awareness as well as supporting initiatives that improve youth education and living conditions. We prohibit any use or contracting, directly or indirectly, of slavery, human trafficking, child labor, or any form of forced labor.

Schlumberger is committed to respecting the principles in The International Bill of Human Rights, and conducting business in a manner that preserves and respects human dignity. To ensure the respect of human rights and the progression of sustainable development, Schlumberger has aligned its Global Stewardship program with the Sustainable Development Goals of the United Nations.



### Respecting Immigration Laws Enables Our Global Footprint

#### In Brief

- We comply with all immigration and employment laws.
- We expect all employees to take responsibility for their immigration status.
- We expect all employee dependents and contractor personnel to abide by immigration laws.
- We maintain immigration compliance programs to ensure that correct procedures are followed.

Our business involves the international movement of employees. We must ensure that the travel, transfer, employment and residence of all personnel comply with applicable immigration and employment laws.

This requirement extends to dependents of our employees and to contractor personnel. Schlumberger has visa and immigration compliance programs to assist in this effort, but we are each responsible for our immigration and employment status in the countries where we work and live.

### Trade Control Compliance Safeguards Our Business

#### In Brief

- We comply fully with all applicable trade control laws and regulations.
- We are especially mindful of technology transfers.
- We review all shipments for compliance before they are shipped or released.
- We expect all employees to consult a trade control compliance manager on any questionable import or export.

Schlumberger provides products and services in many countries worldwide. Virtually all the countries in which we operate have customs laws and many have additional trade controls that govern the import, temporary import, export or reexport of Schlumberger products, services, technology and software.

We must comply strictly with all trade control laws and regulations that apply to us, wherever we do business.

### 0

I will be performing a safety inspection on a deepwater rig in West Africa. The team on the rig needs equipment for the job. Can I carry it to the rig for them?

### A

Maybe. Hand-carrying products, software or technical data from one country to another is considered an export or re-export and is subject to applicable trade regulations, including the proper filing of customs paperwork.

If the proper procedure is not followed, hand-carrying items to another country may subject an employee to disciplinary action.

# Data Privacy and Protection Preserves Information Security

#### In Brief

- We respect the privacy of our employees and ensure proper collection and use of personal data and hold those who handle such information accountable for its proper use.
- We protect the security of personal data and maintain records in accordance with regulations.
- We expect employees to refrain from discussing other employees or company business in public forums.
- We require employees to refer all external inquiries for information to the Legal or Communications function.

Personal information must be collected only for lawful business purposes. Schlumberger is committed to protecting and respecting the privacy of any employee or third-party personal information that it processes. Specific internal data privacy requirements guide the collection, use, transfer (including transfer across international boundaries), release, disclosure and security of such data. These requirements also describe our expectations for third parties who process such data on our behalf.

The transfer of employee data to third parties located in countries that do not have adequate levels of personal data protection (e.g. outside the European Economic Area) is regulated more strictly.

What are some examples of employee personal data?

### Α

0

Employee personal data includes an employee's name, birth date, address, telephone number, social security number, and financial or bank account information.

Such employee data may be processed only for legitimate and appropriate purposes in connection with Schlumberger business activities.

# Representing Schlumberger Is a Privilege

In our daily lives, we interact in a variety of public forums, such as conferences and professional society events or through the Internet and social media. In these situations, we may unintentionally be seen as representing Schlumberger in an official capacity. We represent Schlumberger whenever we identify ourselves as Schlumberger employees or affiliates.

What we publish externally reflects on the entire company. Any profile and related content that we post on personal or social networking web sites must be consistent with how we are expected to present ourselves to customers and colleagues as Schlumberger employees. Refrain from discussing Schlumberger business or confidential company information on these web sites or anywhere else outside the company.

### 0

As a field engineer working on a customer rig, would it be okay to post on a social media site photos of me and my crew at work?

### Α

Maybe. Social media should not be used to publish, post or discuss Schlumberger or customerrelated information without prior approval. Photos of Schlumberger or customer equipment, premises or products could contain such proprietary information.

Also, the presence of other individuals in the photos could raise questions about data privacy.



### Information Technology Enables Superior Results

Schlumberger provides its employees with a range of information technology tools, such as computers, software and networks for business purposes. Reasonable personal use of these tools is allowed. All electronic records produced using Schlumberger tools or transmitted using Schlumberger networks are Schlumberger property, including email, instant messages and computer files.

Schlumberger has the right to review the information stored or transmitted using these tools. Employees should have no expectation of privacy over any such information, subject to applicable data privacy laws.

# Maintaining Confidentiality and Information Security Protects Our Future

#### In Brief

- We treat all electronic records that are created or transmitted using company tools as company property.
- We allow limited personal use of Schlumberger IT tools, and employees should have no expectation of privacy over any information stored or transmitted using such tools.
- We take every available measure to preserve the confidentiality of Schlumberger and customer data.
- We expect each employee to prevent disclosure of confidential information and to protect access to company property.

### Information Is the Foundation Of Our Business

We must protect important information, whether it belongs to Schlumberger or to others, such as our customers, who have entrusted it to us. We may learn confidential or commercially sensitive information directly from a customer or while we are performing our jobs. Confidential information comes in many forms, including in conversation, on paper or electronically. Examples of confidential information include tool designs, application source codes, marketing plans, customers' reservoir data, information stored in the corporate directory, employee personal data and financial operating results.

#### **Protecting Restricted Information**

Accidental disclosure of confidential information can be as harmful as intentional disclosure. If we have access to information that is commercially sensitive or confidential, we may not disclose that information to any unauthorized person, inside or outside Schlumberger, without obtaining the necessary prior approvals.

We need to be particularly careful of what we and our family members say or do in our day-to-day interactions with customers and other business associates and in social settings. Be careful when handling computers, software and data to prevent inadvertent disclosure of sensitive information. Protect company computers and other data devices from theft and damage.

Everyone must obtain the appropriate management authorization to access company property, including buildings, equipment and data.

# Protecting Our Intellectual Property Promotes Technological Innovation

#### In Brief

- We protect our technology and intellectual property assets.
- We require employees to acknowledge that intellectual property created while working for the company belongs exclusively to the company.
- We comply with restrictions on the installation and use of third-party software.
- We do not allow employees to make or use copies of software, publications, copyrighted materials or trademarks without proper authorization.

Schlumberger's investment in technology requires strong protection of the resulting intellectual property assets. Intellectual property is created when a Schlumberger employee makes a new discovery or conceives of an idea, device, technique or process that is related to our business. The invention becomes the exclusive property of Schlumberger. Upon joining the company, all employees agree to this concept as a condition of employment.

The company also protects its intellectual property and confidential information by using non-disclosure agreements and confidential disclosure agreements before giving third parties access to such information.



# Respecting Copyrights, Software Licenses And Trademarks Benefits Us All

Schlumberger respects copyright and trademark laws and observes the terms and conditions of software license agreements. Never make unauthorized copies of software, publications or other copyrighted material. Likewise, never use trademarks without proper authorization.

All the software, copyrighted material or trademarks we use must be properly licensed or owned by Schlumberger. We must comply with company restrictions on the installation and use of third-party software on company computers.

# Managing Business Records Ensures Transparency

#### In Brief

- We maintain honest and accurate business records.
- We never hide, alter, falsify or disguise the true nature of any business transaction.
- We comply with accounting and financial reporting standards and require employees to comply with internal financial approval limits.
- We retain or destroy business records in accordance with local laws and Schlumberger requirements.

#### Full and Accurate Accounting Of Our Activities

We must keep honest and accurate business records. The company's ability to make responsible business decisions; to meet legal, financial, regulatory and management obligations; and to maximize the benefit of previous experience, depends on compliance with this requirement.

Never hide, alter, falsify or disguise the true nature of any business transaction. Business records and communications often become public, so avoid exaggeration, derogatory remarks, speculation or inappropriate characterization of people and companies. This applies equally to instant and email messages, internal memos and formal reports.

#### Archiving and Destroying Business Records

Every business unit is responsible for ensuring that its records are retained or destroyed according to local laws and Schlumberger requirements governing document retention and destruction.

At times, the company may direct us to retain documents, in electronic or other formats, in connection with certain specific subjects, such as litigation, government inquiries or government or customer audits. Failure to retain documents could result in criminal, civil or administrative penalties or disciplinary action.

# Rigorous Accounting And Financial Reporting Standards Instill Confidence

### Complying with Accounting and Financial Reporting Standards

All company transactions must be described accurately in accounting or supporting documents. Employees with financial reporting obligations must provide accurate and complete information to ensure that any reporting or disclosure of financial information is full, fair, accurate, timely and understandable. Approval by the appropriate level of financial personnel is also required.

These requirements facilitate the preparation of financial statements, provide transparency to our shareholders, and ensure compliance with the U.S. Generally Accepted Accounting Principles (GAAP).

#### Making Financial Transactions On Behalf of the Company

We must have the appropriate management authorization for any transaction that we conduct on behalf of Schlumberger.

Schlumberger