Conflict of Interest Policy

A conflict of interest is a misalignment between our personal interests and the interests of SLB or its customers. A conflict may arise where personal, social, financial, political, or other interests interfere with our responsibilities as SLB employees. All SLB directors, officers and employees must avoid situations which involve, or could appear to involve, conflicts between their personal interests and the interests of SLB companies or of SLB customers, suppliers or other significant stakeholders. SLB employees are expected to put SLB business interests ahead of their own interests when they are in conflict.

Examples include:

a. Using information about SLB business or prospective business for personal gain or to compete (or prepare to compete in the future) with SLB, directly or indirectly, in the purchase or sale of property or other interests.

b. Working for a competitor, supplier, customer or other SLB business partner while employed by SLB.

c. Acting as directors, officers, agents, or consultants of companies competing against SLB.

d. Contracting with a business in which an employee or family member maintains any financial interest.

e. Using SLB property, such as equipment, financial assets or confidential information to support the employee’s own business or personal interests or for other purposes different from SLB purposes.

f. Maintaining a personal relationship that may impact or have the perception of impacting the impartiality of the employee.

Transparency and Disclosure: all SLB employees are required to disclose and resolve any actual, potential, or apparent conflict of interest with their manager. The manager, where necessary, will obtain approval by the appropriate Controller / Finance Manager. The employee may be required to follow mitigation steps to avoid a potential conflict from becoming an actual conflict.

Additionally, any personal loans by SLB to directors or officers (or any family members) or any guarantees of obligations, are specifically prohibited. In addition, personal loans to other employees are prohibited, unless approved by the appropriate Controller.

Any violation of this Policy may subject the employee to disciplinary action.

Olivier Le Peuch
Chief Executive Officer, Schlumberger Limited

For further information regarding this policy:
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