



## Modern Slavery Statement 2021

This **Modern Slavery Statement** is submitted by **Schlumberger Australia Pty Ltd**, jointly with **Cameron APME Holdings Pty Ltd**, which meet the reporting threshold pursuant to the **Modern Slavery Act 2018 (Cth)**.

These Reporting Entities are companies incorporated under the laws of Australia and are each ultimately owned by Schlumberger N.V., a company incorporated under the laws of Curacao.

The Reporting Entities operate and carry on the business of providing services and goods to their customers within Australia and beyond, as part of the Schlumberger Group of Companies. Schlumberger is a technology company that partners with customers to access energy by providing leading digital solutions and deploying innovative technologies to enable performance and sustainability for the global energy industry.

This Statement has been prepared in consultation with our key teams that collaborate our human rights program, including cross-functional human rights working group, consisting of representatives from our legal, supply chain, human resources, HSE and sustainability functions; the respective key management personnel of the Reporting Entities; and the key management personnel of the subsidiaries of the Reporting Entities, and approved by the Board of Directors of the Reporting Entities.

For and on behalf of the Reporting Entities

.....  
**Shara Patricia Ciravolo Fesser**  
Managing Director, Schlumberger Australia Pty Ltd  
10 June 2022



2021

# Modern Slavery Statement

Schlumberger

# Introduction

This statement constitutes the Slavery and Human Trafficking Statement (United Kingdom) and joint Modern Slavery Statement (Australia) (together, the “Statement”) with respect to the fiscal year ended 31 December 2021. The Statement summarizes the policies and goals of Schlumberger Limited and its consolidated subsidiaries (together, “Schlumberger,” “us,” “our” or “we”) with respect to the prevention of slavery and human trafficking within our own operations, value chain and business relationships, as well as relevant actions taken in 2021 in furtherance of these policies and goals. The Statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 (United Kingdom) and Section 14 of the Modern Slavery Act 2018 (Australia).

## Executive Summary

At Schlumberger, we are committed to conducting business in a manner that preserves and respects human dignity, which is fundamental to our purpose—to create amazing technology that unlocks access to energy for the benefit of all. By respecting human rights, we look to avoid harm, and we have the potential to contribute to more inclusive societies embraced by the United Nations Sustainable Development Goals.

Our approach to modern slavery is embedded within our broader commitment to respecting human rights. We seek to apply this commitment to all Schlumberger’s operations, value chain and business relationships, including suppliers, contractors, and labor agents, and have made public commitments to global human rights standards including the [United Nations Guiding Principles](#) (UNGPs) and the [10 United Nations Global Compact Principles](#) on human rights, labor, environment, and anti-corruption.

We prohibit any use or contracting, directly or indirectly, of child labor, forced labor, human trafficking, or any other form of modern slavery.





**Over the last year, Schlumberger has:**

1. Completed six independent human rights audits of our facilities and suppliers in five countries and implemented action plans to enable improvements in performance<sup>1</sup>.
2. Delivered contract-specific human rights plans for three customers in five countries, which will support our management of human rights risk for contracted and sub-contracted activities.
3. Implemented a digital platform that maps our suppliers' human rights country risks and supplier category risks, to help prioritize enhanced due diligence requirements.
4. Completed an industry-standard self-assessment questionnaire (SAQ) pilot in four geographies.
5. Developed global guidelines for human rights due diligence in the supply chain, establishing appropriate measures to verify that workers in our supply chain are treated in accordance with our nine fundamental principles for enhancing respect for the rights of workers, listed below:

1



**EMPLOYMENT IS FREELY CHOSEN**

2



**CHILD LABOR SHALL NOT BE USED**

3



**NO DISCRIMINATION IS PRACTICED**

4



**NO HARSH OR INHUMANE TREATMENT IS ALLOWED**

5



**WAGES ARE RESPECTED**

6



**NO WORKER SHOULD PAY A FEE FOR A JOB**

7



**FREEDOM OF ASSOCIATION IS RESPECTED**

8



**COMPLAINTS AND FEEDBACK SYSTEMS FOR WORKERS ARE IN PLACE**

9



**WORKING CONDITIONS ARE SAFE AND HYGIENIC**

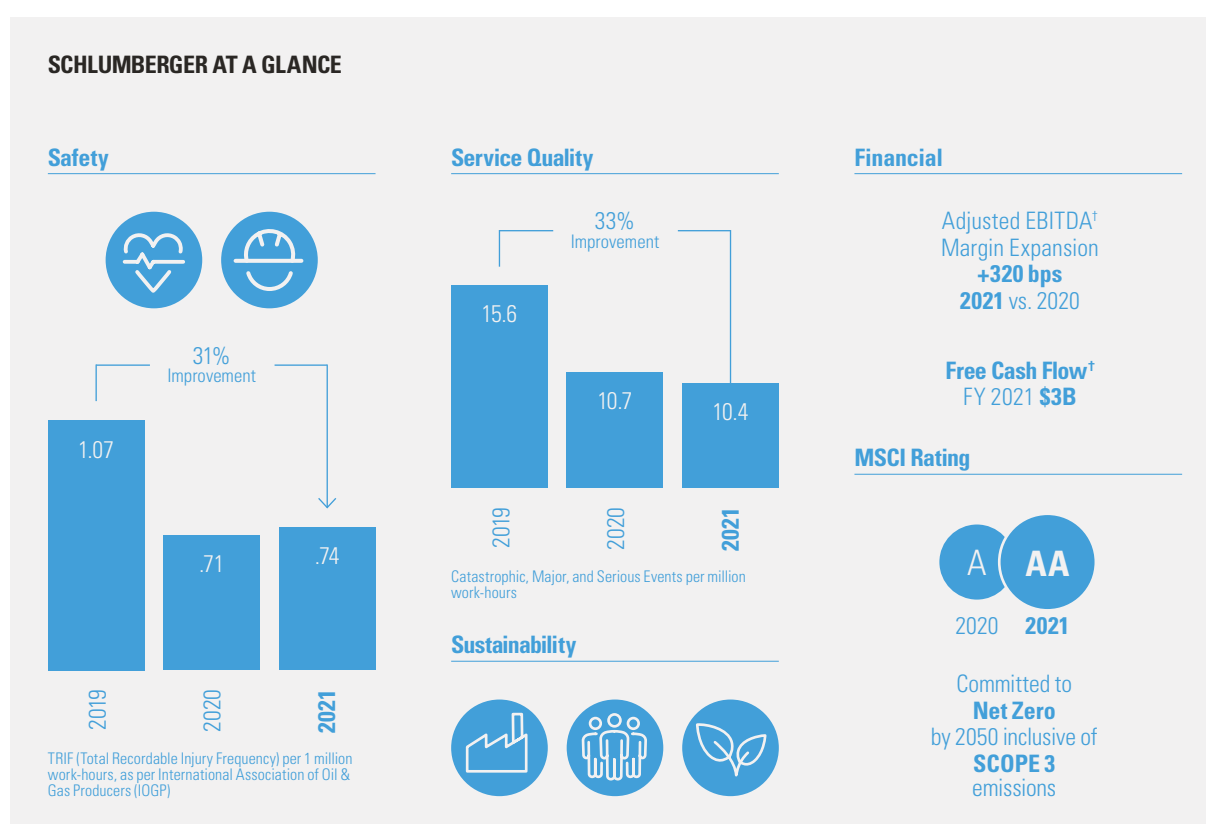
<sup>1</sup> Refer to Section 5 for examples of responsive actions we took based on findings from an independent human rights audit

# Section 1: Our Company and Supply Chain

## Our Company

Schlumberger (SLB: NYSE) is a technology company that partners with customers to access energy. Our people, representing over 160 nationalities, are providing leading digital solutions and deploying innovative technologies to enable performance and sustainability for the global energy industry. With expertise in more than 120 countries, we collaborate to create technology that unlocks access to energy for the benefit of all.

Find out more at [slb.com](https://slb.com).



Schlumberger is organized under four Divisions operating in five distinct Basins that are aligned with critical hubs of activity. These Divisions combine and integrate Schlumberger's technologies, enhancing our ability to support the emerging long-term growth opportunities in each of these market segments. The four Divisions are:

- Digital & Integration
- Reservoir Performance
- Well Construction
- Production Systems

<sup>†</sup> For reconciliations of (i) adjusted EBITDA to income before taxes on a GAAP basis and (ii) free cash flow to cash flow from operations, see our fourth-quarter and full-year 2021 results earnings press release at <https://investorcenter.slb.com/node/23866/html> (p. 23).

## Our Supply Chain

“We are committed to respecting human rights across our Planning and Supply Chain organization, including by partnering with our suppliers to prevent modern slavery in our supply chain, protect labor rights and promote a safe, secure and inclusive working environment.”

Gwenola Boyault, Vice President Planning and Supply Chain

As a global technology company with diverse product and service offerings, we have suppliers and service providers throughout the world. Schlumberger’s Planning and Supply Chain organization provides our field and manufacturing locations with strategic sourcing, supplier management, logistics, and inventory management. In today’s competitive global economy, we know that strong relationships with our suppliers are more important than ever to strengthen our ability to meet our own and our customers’ needs.

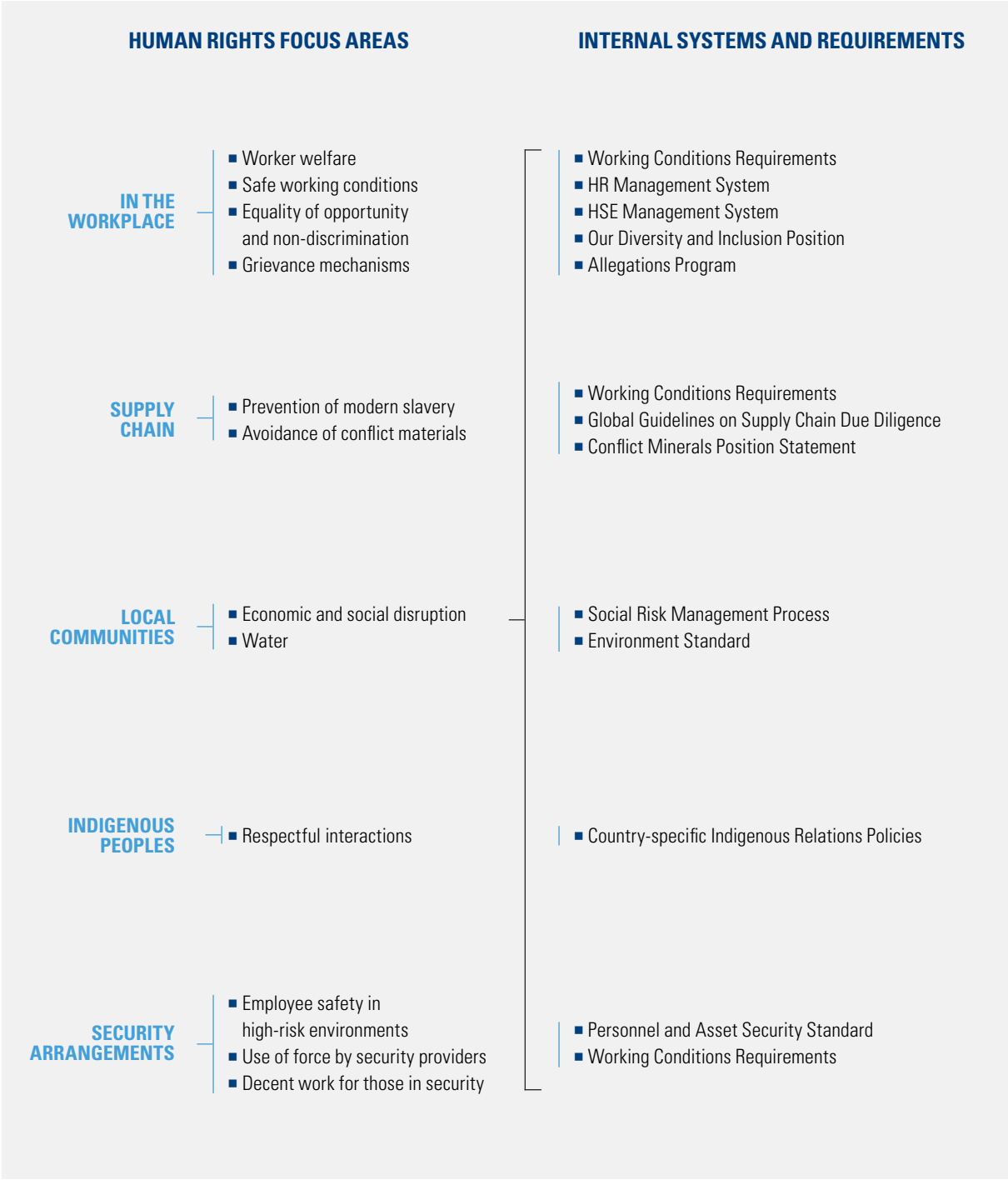
Our Procurement and Sourcing Policy states that we will work with our suppliers in a socially responsible and ethical manner. In return, we expect our suppliers to work in a professional, ethical, socially responsible and cost-effective manner consistent with our policies, procedures, and business objectives. We believe strategic sourcing and the adoption of supplier management processes foster relationships that encourage supply chain best practices and add value for our suppliers, our customers and ourselves.

In evaluating potential suppliers, we consider delivery price, supplier reliability, operational costs and after-sales support. We procure goods and services only from financially stable, technically qualified, and reliable sources. We require that our suppliers—as well as contractors and labor agents—comply with the laws of the countries in which they operate, or with industry guidelines where they exist and are more stringent than local law.

Read more at <https://www.slb.com/who-we-are/for-suppliers/sustainable-supply-chain>

# Respecting Human Rights

Schlumberger manages human rights as an integrated program with overarching policies, systems and processes that are designed to be consistently applied across the company. We have identified five key human rights focus areas relevant to our global operations, business relationships and supply chain, as reflected in the below chart. The chart also highlights the internal systems and requirements that our operations and employees must adhere to or comply with.



## Working with Others

We continue to explore ways we can promote meaningful stakeholder engagement with individuals, workers and communities that are or could be affected by our operations, business relationships, and supply chain. For example, we meet regularly with investors, join industry initiatives and partnerships, participate in academic forums, and, in consultation with our customers, participate in local community meetings. Among our recent human rights-focused partnerships:

- Schlumberger is a participant member of the [United Nations Global Compact](#), supporting and integrating its Ten Principles on human rights, labor, the environment, and anticorruption into our global operations.
- Recognizing the importance of industry collaboration, in 2017, Schlumberger became the first associate member of [IPIECA](#), the global oil and gas industry association for advancing environmental and social performance. In 2019, we became the chair of IPIECA's Human Rights Working Group, working to promote industry collaboration and develop tools and [guidance to address human rights risks](#).
- Since 2017, we have been a member of the Oil and Gas Trafficking Advocacy Group, a group of operators and service companies who are committed to raising awareness about human trafficking and educating companies in North America about the role they can play in ending it.

# Section 2: Policies and Governance with Respect to Modern Slavery

## Policies

Schlumberger maintains a series of applicable governance documents that support our human rights commitments, including our prohibition of any use or contracting, directly or indirectly, of child labor, forced labor, human trafficking, or any other form of modern slavery.

1. [The Blue Print in Action—Our Code of Conduct](#) sets forth Schlumberger's commitment to respecting the principles in The International Bill of Human Rights, and to conducting business in a manner that preserves and respects human dignity. Our Code of Conduct applies to all Schlumberger directors, officers, employees, security providers and contractors. All suppliers, contractors and agents (including labor agents) must be approved and managed in accordance with our Code of Conduct and internal requirements.
2. Our [Human Rights Position Statement](#) provides additional details about Schlumberger's approach to human rights. It incorporates internationally recognized human rights standards including the UNGPs and relevant ILO Conventions.



3. Our [Working Conditions Requirements](#) provide a common baseline for the expected treatment of all employees, contractors, temporary workers, trainee workers and migrant workers. It sets out nine principles to raise standards and assist our operations and suppliers in reviewing their performance with respect to human rights in the workplace. We have adopted the [Building Responsibly Worker Welfare principles](#), widely used across the energy sector, as the basis for our Working Conditions Requirements.
4. Schlumberger recognizes that there are serious human rights abuses associated with the extraction, transportation, and trade of minerals in some countries, including the Democratic Republic of the Congo and its adjoining countries. We support responsible sourcing of materials from suppliers that share our values and we commit to avoid contributing to the conflict through our sourcing and supplier management activities, as outlined in our [Conflict Minerals Policy](#).

Any supplier entering into a contract with Schlumberger must agree to promote and abide by our Code of Conduct, Human Rights Position Statement and Working Conditions Requirements. Any such supplier also is required to inform us of any act or omission, actual or potential, that does not comply with the foregoing.

Failure to comply with our Code of Conduct, Human Rights Position Statement and Working Conditions Requirements is deemed a material breach, entitling us to immediately terminate our agreement with the supplier. Where Schlumberger identifies a nonconformance event with a link to human rights issues, we look to provide for or cooperate in the remedy of the event in a fair and transparent manner. We expect our suppliers to implement, throughout their supply chains, human rights obligations similar to those in our agreements with them.

## **Governance**

Responsibility for the management of human rights extends across our company. We also have clear governance processes to implement our human rights program and deliver on our human rights commitments. Our Executive Leadership Team discusses human rights issues as part of our sustainability agenda and continues to provide oversight of our human rights program. A Human Rights Working Group was formed in 2018, with representatives across the business, to advise on human rights-related risks and to review the operational effectiveness of our human rights program.

# Section 3: Risk Assessment and Due Diligence

Consistent with the UNGPs, our approach to modern slavery covers each area articulated in the [IPIECA Human Rights Due Diligence Guidance](#) (2021) model reflected below:



## Assessing Risk in Our Supply Chain

Understanding where our key supply chain risks lie is the starting point for taking action. In 2019, we commissioned an independent risk analytics firm to complete a high-level risk assessment across our global operations, to identify the primary human rights risks in our supply chain and help us prioritize action items in response to these risks. This assessment covered all of our active direct suppliers—meaning those suppliers who provide goods and services directly to Schlumberger—across various purchasing categories and countries in which our suppliers do business. Key findings are included in [Appendix 1](#).

## Evaluating and Managing Suppliers

We continue to evolve how we evaluate and manage human rights risks through our sourcing and supplier management processes. We use a variety of resources and tools to prevent exploitative work practices and modern slavery in our supply chain. We have:

- Appointed a dedicated sustainability role in our Planning and Supply Chain organization to strengthen management and oversight of our sustainable supply chain program.
- Communicated supplier expectations on our [website](#), including specific human rights-focused guidance.
- Integrated initial human rights due diligence steps into our onboarding process for all potential suppliers.
- Implemented a standard business conduct clause in our supplier contracts, which require our suppliers to act in accordance with our Code of Conduct, Human Rights Position Statement and Working Conditions Requirements.
- Developed a supplier risk mapping platform to map our suppliers for human rights country risks and supplier category risks and help prioritize suppliers for enhanced due diligence.
- Introduced processes for selected suppliers to complete the industry-standard SAQ, which is designed to raise awareness of human rights risks and identify suppliers' management processes and controls.
- Integrated human rights questions into our Compliance Audit Tool as part of our supplier audit program, to improve the detection and reporting of onsite issues among higher-risk suppliers.
- Continued our dialogue with suppliers through supplier forums and performance reviews, as well as making the IPIECA and the Building Responsibly modern slavery training (described on page 11 below) available online to our suppliers.

# ipieca

In 2021, Schlumberger contributed to the development of the IPIECA and Building Responsibly modern slavery training materials. This training is designed to increase awareness among employees, contractors, and suppliers on human rights issues, and to promote effective corporate responsibility with respect to human rights and labor standards relevant in the oil and gas industry. The training covers key labor issues including forced labor, responsible recruitment, child labor, working hours and overtime, wages, freedom of association, non-discrimination, worker accommodation, and worker grievance mechanisms.

In 2022, we will roll out global guidelines for human rights due diligence in our supply chain, formalizing accountabilities and requirements for modern slavery risk management in 30 geographies around the world.

In general, our supplier contracts mandate that our suppliers:

- Abide by our Code of Conduct and Human Rights Position Statement;
- Implement policies, procedures, or processes that meet the Working Conditions Requirements;
- Flow down equivalent principles and communicate similar requirements to their suppliers; and
- Have developed audit protocols to maintain compliance with the above.



**Figure 1: Elements of the sourcing and contractor management process where we are embedding human rights.**

# Section 4: Training and Awareness Raising

Our Code of Conduct sets out how we are expected to behave, including our responsibility to respect human rights. Members of our workforce, including full-time and part-time employees and contract workers, are required to complete ethics and compliance training on at least an annual basis, or more frequently as appropriate. This training includes annually reviewing our Code of Conduct, and providing a certification acknowledging receipt of and agreement with our Code of Conduct.



In 2021, we continued to expand our human rights training program, which is designed to provide all employees and contractors with a general understanding of human rights issues and make human rights a topic all employees and contractors can speak about and act upon.

## Over the last year, Schlumberger has:

1. Begun development of an Introduction to Human Rights video training, which will become mandatory for all employees and contractors and will be rolled out in 2022.
2. Updated the company's Respect and Professionalism in the Workplace training, which is mandatory for all employees and contractors, as we continue our drive to a more inclusive environment.
3. Delivered tailored training on ethical recruitment and the "Employer Pays Principle"<sup>3</sup> to more than 100 employees.
4. Integrated human rights moments into our HSE Communications Toolbox to facilitate discussion of human rights at the beginning of a meeting or a work shift.
5. Launched a campaign on United Nations Human Rights Day to raise awareness and engagement levels among employees.
6. Deployed the IPIECA and Building Responsibly modern slavery training materials in the Schlumberger eLearning Platform and developed training pathways for employees and contractors with touchpoints to human rights.

<sup>3</sup> Under our Nine Fundamental Principles of the Working Conditions Requirements, this is the principle that no worker should pay for a job. The costs of recruitment should be borne by the employer, and not by the worker.



# Section 5: Our Effectiveness in Combating Modern Slavery

Currently, we track our effectiveness in combatting modern slavery through: biannual reviews of our human rights program by our Human Rights Working Group; feedback provided by customers associated with human rights audits; ongoing dialogue with our suppliers through supplier forums and performance reviews; reviews of findings through our supplier audit processes; and investigation and analysis of complaints related to our Working Conditions Requirements.

## **Taking immediate and effective measures**

An independent human rights assessment at a Schlumberger facility in Africa found that sub-contractors' ages could not be verified on site because the community enterprise responsible for providing the workers at the facility had not provided auditable documents or records to the facility. In response, we implemented the following actions:

- Integrated labor rights awareness materials in the New Employee Safety Training for all personnel working at the facility.
- Introduced age verification checks for new sub-contractors as part of the access control procedures for work in facilities in higher risk countries.
- Increased awareness of Schlumberger's reporting options for onsite sub-contractor populations.

## **Key Performance Indicators**

Below are the Key Performance Indicators we will measure in 2022 to help assess our effectiveness in combatting modern slavery and inform our decision-making:

- The percentage of suppliers that are identified as high, medium, or low risk.
- The percentage of facilities that are identified as high, medium, or low risk.
- The number of SAQs issued and answered by our suppliers.
- The number of facility and supplier audits completed.
- The percentage of employees and contractors trained in human rights.

**In 2022, our human rights initiatives will focus on:**

- 1.** Rolling out a new Introduction to Human Rights video and mandatory training for all employees and contractors.
- 2.** Rolling out our global guidelines for human rights due diligence in our supply chain across 30 geographies.
- 3.** Developing an assurance program to assess our effectiveness in identifying and managing human rights risks at Schlumberger facilities around the globe.
- 4.** Enhancing mechanisms for access to remedy by assessing our Allegations Program against the UNGP Effectiveness Criteria.
- 5.** Assessing our Key Performance Indicators in relation to our effectiveness in combatting modern slavery.

**Consultation**

This statement has been prepared in consultation with our key teams that collaborate to execute our human rights program. This includes the cross-functional human rights working group, consisting of representatives from our legal, planning and supply chain, human resources, HSE and sustainability functions.

This statement is made on June 2nd, 2022.

## Cautionary Statement Regarding Forward-Looking Statements

This modern slavery statement, as well as other statements we make, contain “forward-looking statements” within the meaning of the U.S. federal securities laws — that is, any statements that are not historical facts. Such statements often contain words such as “aim,” “goal,” “expect,” “may,” “believe,” “predict,” “plan,” “potential,” “projected,” “projections,” “forecast,” “estimate,” “intend,” “commit,” “pledge,” “target,” “anticipate,” “think,” “should,” “would,” “could,” “will,” “see,” “likely,” and other similar words. Forward-looking statements address matters that are, to varying degrees, uncertain, such as statements about our goals, plans and projections with respect to human rights, corporate responsibility and other social and sustainability matters; and performance and operational targets and other goals. These statements are subject to risks and uncertainties, including, but not limited to, our inability to achieve our human rights performance targets and other forecasts and expectations; our inability to meet workforce expectations and perform at desired environmental, social, governance and stewardship standards; challenges in our supply chain; and other risks and uncertainties detailed in our most recent Forms 10-K, 10-Q, and 8-K filed with or furnished to the U.S. Securities and Exchange Commission. If one or more of these or other risks or uncertainties materialize (or the consequences of any such development changes), or should our underlying assumptions prove incorrect, actual outcomes may vary materially from those reflected in our forward-looking statements. Forward-looking statements are aspirational and not guarantees or promises that goals or targets will be met. In addition, historical, current, and forward-looking environmental, social and sustainability-related statements may be based on standards for measuring progress that are still developing, internal controls and processes that continue to evolve, and assumptions that are subject to change in the future. The forward-looking statements in this modern slavery statement speak only as of June 2, 2022, and Schlumberger disclaims any intention or obligation to update publicly or revise such statements, whether as a result of new information, future events or otherwise.

The Schlumberger logo is displayed in a bold, blue, sans-serif font. It is centered on a light gray, semi-circular background that arches over the text.

For more information, please visit [www.slb.com/sustainability](http://www.slb.com/sustainability)

## Appendix 1

In 2019, Schlumberger commissioned an independent risk analytics firm, Verisk Maplecroft, to conduct a high-level risk assessment across our global operations, to identify the primary human rights risks in our supply chain in an effort to prevent the indirect use of modern slavery.

This assessment covered all of our active direct suppliers—meaning those suppliers who provide goods and services directly to Schlumberger—across various purchasing categories and countries in which our suppliers do business. We refer to these suppliers as “Tier 1” suppliers. The assessment also provided deep dive analysis into specific supplier categories and markets where we are developing or planning to develop enhanced supplier due diligence processes.

We used two key indicators—country risk and category risk—to analyze key supplier categories and markets for use of enhanced supplier due diligence processes.

- Country risk refers to the relative risk exposure of our suppliers based on each supplier’s invoicing or service delivery location. Country risks are based on the strength of national legal frameworks related to human rights, country-level implementation and enforcement capabilities, and the prevalence and severity of human rights violations and modern slavery within the country.
- Category risk refers to the relative risk exposure of our suppliers based on the materiality of human rights and modern slavery risks for each industry, operation-type, or other “category” to which they are assigned.

Below are some of the key findings related to modern slavery from this high-level supplier risk assessment.

- Overall supplier risk exposure distribution: The company’s supply chain has a relatively low risk exposure from a labor rights perspective. This is because it has a skilled supplier base which mostly operates in countries with high levels of respect for human rights.
- Highest risk supplier categories: Based on our supplier risk assessment and expert opinion, we have identified the following as the Tier 1 supplier categories with the highest exposure to modern slavery risks:
  - Cabins, camps and cargo
  - Crew transportation
  - Facilities—engineering and construction
  - Maintenance and repair operations
  - Trucking

These findings are being used to inform a variety of risk mitigation measures, including enhanced due diligence for suppliers exposed to the highest risk, local supplier engagement activities in certain countries, and training for internal procurement teams. Furthermore, we will continue to review and strengthen how we prevent, identify and manage human rights risks in our supply chain.

# Schlumberger

For more information, please visit  
[www.slb.com/sustainability](http://www.slb.com/sustainability)