

**BAKER  
HUGHES**  
a GE company



# THE SPIRIT & THE LETTER



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# INTRODUCTION

- At Baker Hughes, a GE company (BHGE), doing the right thing always comes first.
- As we invent smarter ways to bring energy to the world we need to make sure that everything we do is safe and takes care of our people, our customers, the communities that we operate in, and the environment.
- By consistently demonstrating this commitment we distinguish ourselves in the industry and strengthen the trust between us, our customers, our suppliers and the public – maintaining our reputation as a responsible business.
- We are all trusted partners to our customers and suppliers. Therefore, every one of us needs to conduct business with integrity and in a consistently professional manner.
- Each of us needs to ensure that we hold ourselves to the highest standards, are compliant at all times with necessary policies, procedures and regulations in every country, and abide by the spirit and letter of the law.
- This document has been created to provide you with further information about our policies and standards, as well as give you guidance on how to be fully compliant.
- Please read it carefully to know what is expected of you.



# The BHGE code of conduct

- 01** Be honest, fair and trustworthy in all of your BHGE activities and relationships.
- 02** Obey applicable laws and regulations governing our business worldwide.
- 03** Fulfill your obligation to be the voice of integrity and promptly report any concerns you have about compliance with law, BHGE policy or this Code.
- 04** Simple compliance is more effective compliance. Effective compliance is a competitive advantage. Work to run the Company in as competitive a way as possible — with speed, accountability and compliance.

# WHO SHOULD FOLLOW THESE POLICIES

*The Spirit & The Letter* must be followed by anyone who works for or represents BHGE.

## THIS INCLUDES:

- **BHGE directors, officers and employees.**
- **Subsidiaries and controlled affiliates.**  
Entities in which BHGE owns more than 50 percent of voting rights, or which BHGE has the right to control, are required to adopt and follow BHGE compliance policies.

**BHGE employees working with third parties such as consultants, agents, sales representatives, distributors and independent contractors must:**

- Require these parties to agree to comply with relevant aspects of BHGE's compliance policies.
- Provide these parties with education and information about policy requirements.
- Take action, up to and including terminating a contract, after learning that a third party failed to abide by BHGE's compliance policies.



### **ABOUT THIS GUIDE**

This guide provides an introductory summary to these policies — not the full policies themselves.

# WHAT EMPLOYEES MUST DO

## BE KNOWLEDGEABLE

**Gain an understanding** of *The Spirit & The Letter* policies. Complete training in a timely fashion.

**Learn the details** of any *Spirit & Letter* policy that is relevant to your individual job responsibilities.

**Learn about your detailed functional and regional policies and procedures** and understand how to apply them to your job.

## BE AWARE

**Stay attuned** to developments in the industry that might impact BHGE's compliance with laws and regulations or reputation in the marketplace.

**Understand BHGE may review, audit, monitor, intercept, access and disclose information** processed or stored on BHGE equipment and technology, or on personally-owned devices permitted BHGE network access.

## BE COMMITTED

**Promptly raise any concerns** about potential violations of law or BHGE policy.

**Cooperate fully and honestly** in BHGE investigations related to integrity concerns.

## THE COST OF NONCOMPLIANCE

Employees and leaders who do not fulfill their integrity responsibilities face disciplinary action up to and including the termination of their employment. The following examples of conduct will result in disciplinary action.

### EXAMPLES

**Violating law or BHGE policy** or requesting that others do the same.

**Retaliating against another employee** for reporting an integrity concern.

**Failing to promptly report** a known or suspected violation of BHGE's integrity policies.

**Failing to fully and honestly cooperate** in BHGE investigations of possible policy violations.

**Failing as a leader** to diligently ensure compliance with BHGE's integrity principles, policies and law.

# WHAT LEADERS MUST DO

BHGE holds its leaders accountable for creating a culture of compliance in which employees understand their responsibilities and feel comfortable raising concerns without fear of retaliation. Leaders' responsibilities span prevention, detection and response to compliance issues.

## PREVENT

**Personally set the example for integrity**, not just through words, but more importantly, through actions.

**Ensure employees understand** that business results are never more important than ethical conduct and compliance with BHGE policies.

**Create an open environment** in which every employee feels comfortable raising concerns.

**Communicate the importance of compliance** with sincerity and conviction at every appropriate opportunity.

**Commit adequate resources** to the compliance program.

**Champion an effective BHGE ombudsperson network.**

## DETECT

**Lead compliance processes** through regular compliance reviews.

**Conduct periodic compliance reviews** with the assistance of compliance leaders and internal audit.

**Implement control measures** such as “dashboards” and “scorecards” to detect heightened compliance risks and violations.

## RESPOND

**Document and escalate** any employee's expressed concern through the appropriate channels.

**Take prompt corrective action** to address identified compliance weaknesses.

**Take appropriate disciplinary action.**

**Integrate employees' integrity contributions** into evaluations and recognition and reward programs.

# BE THE VOICE OF INTEGRITY

Being the voice of integrity isn't always easy, but when we raise integrity concerns, we make our Company stronger and protect our colleagues from harm.

You do not need to be certain that a violation has occurred. At the same time, you have an obligation to promptly raise a concern when you see a situation in which our integrity principles or policies are not being followed.

Confidentiality is respected and you may even choose to remain anonymous. Your identity and information will only be shared on a "need-to-know" basis. Any retaliation — whether direct or indirect — against employees who raise a concern is grounds for discipline up to and including dismissal.

## HOW TO RAISE AN INTEGRITY CONCERN

BHGE offers several channels for raising concerns. You can choose to speak to someone about a potential integrity issue or put it in writing. Generally, your supervisor or manager will be in the best position to resolve an integrity concern, but **other resources include:**

- Your human resources leader.
- A compliance leader or auditor.
- Company legal counsel.
- Next level of management.
- A BHGE ombudsperson\* or integrity helpline.
- The BHGE Board of Directors.

- A General Electric Company (GE) ombudsperson.
- Nothing in this policy prevents you from reporting potential violations of law to relevant government authorities

## HOW WE HANDLE INTEGRITY CONCERNS

BHGE fairly examines every integrity concern, and managers are required to escalate employees' concerns to the compliance team. **During the investigation process, BHGE:**

1. Forms an objective investigation team.
2. Determines the facts through interviews and the review of relevant documents.
3. Recommends corrective action, if necessary.
4. Provides the person who raised the original concern (if that person is known) with feedback on the outcome.

### RAISE A CONCERN BHGE Ombudsperson

The ombudsperson process allows you to voice your integrity questions and concerns, anonymously if you prefer

BHGE Ombudsperson  
Baker Hughes, a GE company  
PO Box 41925  
Houston, TX, 77421-1925  
+1 281 921 2775  
[bhge.ombuds@bhge.com](mailto:bhge.ombuds@bhge.com)

### BHGE Board of Directors

You can report concerns about BHGE's accounting, internal accounting controls or auditing matters, as well as other concerns to the Board of Directors or the Audit Committee.

BHGE Board of Directors  
Bakers Hughes, a GE company  
17021 Aldine Westfield Road  
Houston, TX 77073  
[bhge.ombuds@bhge.com](mailto:bhge.ombuds@bhge.com)

### BHGE Hotlines

Employees may continue to utilize the BHI Business Ethics Line to raise concerns. This is a free, multilingual, 24-hour service answered by an independent third party.  
+1 800 288 8475 (US toll free)  
+1 713 626 0521

\*BHGE ombudspersons are different than the legacy BHI Ombuds program. BHGE Ombuds will be local resources available for compliance concern intake.



# REGULATORY EXCELLENCE

## RESPONSIBILITIES OF EMPLOYEES

- **Know and comply** with the laws and regulatory requirements that affect your job responsibilities.
- **Treat regulators professionally**, with courtesy, honesty and respect at all times.
- **Coordinate with experts** when working with or responding to requests from regulators.
- **Be the voice of integrity and promptly escalate any potential issues** that may lead to a regulatory compliance breach.

## RESPONSIBILITIES OF LEADERS

- **Incorporate regulatory requirements** into business strategy and processes.
- **Assign owners to regulatory risk areas** and ask them to partner with appropriate BHGE government affairs and regulatory experts.
- **Confirm you and your team have access to subject matter expertise** needed to manage regulatory risks.
- **Develop strong processes to anticipate risks**, including new and changing regulations.
- **Monitor regulatory compliance** on an ongoing basis and conduct periodic audits of key processes.



### WHAT YOU SHOULD KNOW

In every market in which BHGE operates, BHGE must comply with an ever-expanding array of laws and regulations that are often being enforced more aggressively than ever before. In some cases, laws made by one country seek to regulate activities that take place outside of that country. This environment demands that every employee and leader be committed to regulatory excellence.

# IMPROPER PAYMENTS

**RULE TO REMEMBER** » Do not permit or engage in bribery or corruption of any kind.

## OUR POLICY

**BHGE prohibits bribery** in all business dealings, in every country around the world, with both governments, employees of state-owned companies and the private sector.

**BHGE prohibits even small facilitation payments** to expedite routine administrative actions. In extraordinary circumstances and with the prior approval of the BHGE Chief Compliance Officer or General Counsel, or where an employee's safety or security is at stake, such a payment may be made. Our goal is to eliminate all facilitation payments.

**We maintain strong controls aimed at preventing and detecting bribery.** This includes a rigorous process for appointing and managing third parties acting on BHGE's behalf in business dealings.

**We maintain accurate books, records, and accounts** that correctly reflect the true nature of all transactions.

## YOUR ROLE

- **Never offer, promise, make, or authorize** a payment or the giving of anything of value to anyone in order to obtain an improper business advantage.
- **Remember that providing gifts, entertainment or anything else of value to government employees** is highly regulated and often prohibited. Do not provide such gifts, entertainment or anything else of value, unless you have received prior approval consistent with policy.
- **Follow BHGE guidelines** regarding gifts and entertainment, travel and other business courtesies.
- **Never contribute Company funds or other BHGE assets for political purposes** without obtaining prior approval from Government Affairs, a Company officer or BHGE legal counsel.
- **Follow BHGE due diligence procedures** and require that any third party representing BHGE be carefully selected and fully compliant with this policy.
- **Treat with extreme caution** a demand from a third party to receive its commission payment prior to winning a deal/contract.
- **Be very wary of any suggestion** to direct BHGE business through a specific representative or partner due to a "special relationship."
- **Be suspicious of any request** to make a payment to a person who is not related to the transaction being discussed — or a request that payments be made in another country.
- **Watch out for commissions** that seem too large in relation to the services provided.



## WHAT YOU SHOULD KNOW

**Bribery** means giving, offering or promising anything of value to gain an improper business advantage.

**Facilitation payments** are small customary amounts paid to government employees to expedite routine clerical or administrative actions such as issuing permits.

# SUPPLIER RELATIONSHIPS

**RULE TO REMEMBER** » Work only with suppliers that uphold BHGE's values and high integrity standards.

## OUR POLICY

**BHGE relationships with suppliers** must be based on lawful and fair practices.

**BHGE provides suppliers a fair opportunity** to earn a share of BHGE's purchasing volume, including small businesses, and businesses owned by the disadvantaged, minorities, women and disabled veterans.

**BHGE only does business with suppliers** that comply with all applicable legal requirements and BHGE guidelines relating to labor, employment and environment, health and safety and that treat workers and others fairly and with respect.

**BHGE, as a business enterprise, promotes** respect for human rights within our supply chain.

**BHGE safeguards information**, including confidential and proprietary information and personal data, of both BHGE and suppliers.

## YOUR ROLE

- **Follow the procedures** set out in [BHGE's Supplier Responsibility Guidelines](#).
- **Be mindful of BHGE's supplier diversity** program when choosing suppliers.
- **Protect BHGE's confidential and proprietary information** including, where appropriate, with a confidentiality agreement. Also safeguard any confidential information or personal data that a supplier provides to BHGE.
- **Avoid potential conflicts of interest** when you select a supplier and never accept improper gifts or other items of value.
- **If you observe a suspected human rights violation** in BHGE's supply chain, elevate the concern to your manager and/or compliance leader.
- **Always report issues and concerns regarding supplier relationships:** be the voice of integrity and talk to your manager, legal counsel or compliance specialist if you see unsafe conditions in supplier facilities, supplier employees who appear to be underage or subject to coercion, or an apparent disregard of environmental standards in supplier facilities.



## WHAT YOU SHOULD KNOW

BHGE's reputation for integrity can be significantly affected by those whom we select to act as our suppliers.

# INTERNATIONAL TRADE COMPLIANCE

**RULE TO REMEMBER** » Always know what you're exporting, its destination, the end user, and the end use. Be sure to provide Customs with complete and accurate import documentation.

## OUR POLICY

BHGE will comply with all export control, economic sanctions and customs laws that regulate cross-border transfers of goods and technology.

BHGE maintains policies regarding State Sponsors of Terrorism (SSTs) and other sanctioned countries that are often stricter than applicable laws.

## YOUR ROLE

### CUSTOMS

- Follow all business procedures relating to the import of goods.
- Only use BHGE-approved Customs agents.
- Ensure you fully comply with special program requirements before you claim reduced duty rates.
- Report accurate, complete and timely information on import declarations, and provide accurate and complete product descriptions when classifying goods.
- Obtain approval from the customs team before hand-carrying any commercial product across a border.

## EXPORT CONTROLS

- Follow all business procedures relating to the export of goods, software or technology.
- Use the export classification of goods, software or technology to determine if they require government authorization for export.
- Follow 'Know Your Customer/Know Your Supplier' procedures and the 'Company Watchlist Screening Guidelines' to ensure we do not do business with people or companies identified on government restricted party lists.
- Confirm all necessary licenses or authorizations are in place before any export transaction, and adhere to all export license or license exception requirements.
- Do not cooperate with any boycott of Israel or any other boycott or restrictive trade practice not authorized by the U.S. government. Seek legal counsel if a restrictive trade practice or boycott appears to conflict with the laws of another country.



## WHAT YOU SHOULD KNOW

**Export control laws** regulate cross-border transfers of goods, software and technology that can be used for military or weapons proliferation purposes. Some countries also control the release of technical data to foreign nationals within their borders.

**Customs laws** regulate the movement (import and export) of goods across national borders or customs territories, even in the absence of a commercial transaction or import duties.

**Sanctions** (including embargoes and boycotts) can restrict trade in some or most goods and services.

# ANTI-MONEY LAUNDERING

**RULE TO REMEMBER** » Always know your customer and be alert to possible illegal activity

## OUR POLICY

**BHGE is committed to complying** with applicable anti-money laundering, corruption and terrorist financing laws and regulations.

**BHGE conducts business only with customers** involved in legitimate business activities, with funds derived from legitimate sources.

**We adhere to risk-based 'Know Your Customer'** due diligence processes on prospective customers.

**BHGE has controls** to detect, investigate and report suspicious activity.

**We recognize anti-money laundering risks introduced by third party and business partner relationships** and mitigate those risks by, for example, performing watch-list screening.

## YOUR ROLE

- **Collect and understand documentation about prospective customers**, agents and business partners to ensure that they are involved in legitimate business activities and that their funds come from legitimate sources.
- **Follow your business 'Know Your Customer' procedures** and rules on collecting and verifying information from our customers and related parties.

- **Follow your business rules concerning acceptable forms of payment.** Learn the types of payments that have become associated with money laundering (for example payments on behalf of a customer from an unknown person).

**Be alert for and escalate any signs of potential money laundering or other illegal activities.**

## EXAMPLES

- **Attempts by a customer to provide false information to open an account.**
- Offers to pay in cash or overpayments followed by requests for refunds.
- Orders, purchases or payments that are unusual or inconsistent with a customer's trade or business.
- Unusually complex deal structures.
- Unusual fund transfers to or from countries unrelated to the transaction.
- Transactions that might have been structured to evade recording or reporting requirements.



## WHAT YOU SHOULD KNOW

**Money laundering** is the process of hiding the proceeds of crime or making the source appear legitimate.

The term **"Customer"** applies to any party contracted to obtain goods, services, credit or who opens an account.



# WORKING WITH GOVERNMENTS

**RULE TO REMEMBER** » Never take shortcuts when dealing with government – be transparent and always comply.

## OUR POLICY

**BHGE follows the highest ethical standards** in conducting business with governments.

**BHGE commits to comply** with all contract terms and conditions, laws and regulations applicable to BHGE when working with governments.

**We must be truthful and accurate** when dealing with governments.

**We maintain controls and procedures** that target our government business activities specifically to ensure compliance in this highly regulated environment.

## YOUR ROLE

- **Government business is different** – do not pursue government business without knowing the applicable rules and regulations.
- **Before submitting a proposal to a government**, review the requirements with all applicable stakeholders and only accept those terms with which BHGE can comply.

- **Do not accept internal government information** about its selection process nor information about a competitor's proposal unless the government contracting officer has specifically and lawfully authorized its release.
- **After award, perform all contract obligations strictly** in accordance with the terms of the agreement. For example, do not make any substitutions for the goods and services to be delivered or deviate from requirements, without the written approval of the authorized government official.
- **Do not offer, promise, make or authorize the giving of anything of value** to a government employee that is inconsistent with guidelines.
- **Never enter into discussions** with government employees or people close to them about prospective employment of non-employees while they can influence decisions affecting BHGE.
- **In the U.S., certain employees must pre-approve personal political contributions** for compliance with state and local 'pay to play' laws. These employees are officers, directors, sales employees and their managers of BHGE businesses that seek U.S. state or local government contracts. If you are unsure whether you must pre-clear personal political contributions, contact your legal counsel or compliance leader.



## BE AWARE

**Government Employee** and **Government Official** mean an employee, official, or an elected or appointed member of an executive, legislative, or administrative body of a federal, national, state/provincial, or local government from any country. This includes an employee of any public agency/department, state instrumentality, or State-owned or -controlled enterprise. Outside the U.S., employees of public international organizations, candidates for elective office, political party officials, family members of government employees, and members of a royal family may also be considered Government Officials.

**State-owned or -controlled enterprises** may include, state-owned oil companies, public utilities and airlines.

# COMPETITION LAW

**RULE TO REMEMBER** » Do not enter into any agreement with competitors that deprives customers of the benefits of competition.

## OUR POLICY

Every BHGE employee has a responsibility to comply with all applicable competition laws, regulations, decrees and orders in all activities involving competitors, customers, suppliers, trade associations or when collecting competitive information.

BHGE must never collude with other companies on price or terms to be offered to customers; terms with suppliers; agree with competitors to allocate markets or customers; or manipulate the bidding process.

## YOUR ROLE

- **Do not propose or enter into any agreement** or understanding with any competitor about any aspect of competition between BHGE and a competitor, including agreements on pricing, bidding, deal terms, wages or the allocation of markets or customers.
- **Do not propose or enter into any agreement with any other party** regarding whether or how to bid. Only submit bids if the purpose is to compete for and win a particular piece of business.
- **Avoid contacts of any kind with competitors** that could create the appearance of improper agreements or understandings. Actively disassociate yourself from any situations in which improper agreements or information sharing between competitors are raised, and promptly inform your legal counsel.

- **Understand and follow your business's specific guidelines about contacts with competitors**, obtaining and handling competitive information, and participating in trade and professional associations.
- **Avoid agreements or understandings that restrict the price** at which a party may resell a product or service.
- **Do not provide, receive or exchange any of the following types of information with a competitor** or its representative, whether in person, electronically or at an industry meeting:
  - Prices
  - Bids
  - Customers, suppliers, sales territories or product lines
  - Terms or conditions of sale
  - Production, sales capacity or volume
  - Costs, profits or margins
  - Market share
  - Sales, marketing or development strategies for products or services
  - Distribution methods



## TALK TO YOUR LEGAL COUNSEL

- Sale of multiple BHGE products in 'bundles'.
- Exclusive arrangements.
- Technology licenses that restrict the freedom of the licensee or licensor.
- Price discounts that depend on loyalty or volume or are offered only to certain customers.
- Pricing initiatives.
- Distribution or supply arrangements with competitors.
- Policies concerning access of customers and third parties to parts, software and other inputs for the servicing of BHGE equipment.
- Any proposed merger, acquisition or joint venture.

# FAIR EMPLOYMENT PRACTICES

**RULE TO REMEMBER** » Treat all employees fairly and with respect.

## OUR POLICY

**BHGE bases employment decisions on job qualifications and merit** which include education, experience, skills, ability, performance and growth values.

**Employment decisions should also be made without considering** a person's race, color, religion, national or ethnic origin, sex (including pregnancy), sexual orientation, gender identity or expression, age, disability, veteran status or other characteristic protected by law.

**We respect human rights** everywhere we work and do business with others.

**BHGE will comply with all laws** pertaining to freedom of association, privacy, collective bargaining, immigration, working time, wages and hours, as well as laws prohibiting forced, compulsory and child labor, trafficking in persons and employment discrimination.

**We take affirmative action** where required by law to increase opportunities in employment for women, minorities, people with disabilities and certain veterans.

**We respect employees' privacy rights** and will use, maintain and transfer personal data in accordance with BHGE's Employment Data Protection Standards, related procedures and local law.

## YOUR ROLE

- **You may not refuse to work or cooperate** with others because of characteristics covered by this policy such as race, religion, sex, age, or other characteristic protected by law.
- **Create a work environment free from harassment** on the basis of any protected characteristic, and free from bullying.
- **Never make an unwelcome sexual advance** to an employee or other person with whom you work.
- **Never disclose employment data** to a person who does not have a business need, the authority, or, where required, the subject's consent.
- **Consult with your manager and a BHGE legal or compliance specialist** if you encounter a conflict between this policy and local laws, customs or practices.



## WHAT YOU SHOULD KNOW

BHGE absolutely prohibits taking adverse action against an employee because he/she has raised a concern about a violation of policy or law.

# HEALTH, SAFETY & ENVIRONMENT

**RULE TO REMEMBER** » Follow HSE procedures and be alert to environmental and safety hazards in your workplace.

## OUR POLICY

**BHGE strictly complies with all Health, Safety & Environmental (HSE) laws,** regulations and policies that apply to our operations.

**We develop and follow safe work procedures** that help ensure workplace safety, prevent injuries and protect our people, customers, communities and the environment.

**We advance and deliver technologies** that increase efficiency and define new ways of extracting energy, while reducing the negative impacts of oil and gas operations on people and the environment.

**We assess the HSE risks of all new activities** by collaborating with our colleagues, suppliers and customers on the best practices in our industry.

**Our HSE principles apply to everything we do,** from making or servicing products and buying businesses, to driving vehicles and disposing of waste.

## YOUR ROLE

- **Understand and comply with all the HSE policies** that apply to you, including Company policies and any specific policies that apply to your site, position, or operation.
- **Implement BHGE management tools and processes** to find and fix HSE concerns at your site.
- **Follow BHGE policies** for managing, shipping, transporting, importing/exporting and disposing of hazardous materials and chemicals.
- **Question unsafe or improper operations,** and insist on a “stop work” if necessary to address them.



## BE THE VOICE OF INTEGRITY

Eliminating or guarding against hazards starts with identifying them. You must alert supervisors or HSE leaders if you are aware of hazards or standards that are being ignored or hidden.

### Red flags include:

- Failure to obtain or comply with regulatory permits.
- Deviations from written work practices – even if these deviations have become “routine.”
- Lapses in security or emergency preparedness.
- Inadequately maintained tools or equipment.
- Missing machine guards or faulty protective equipment.
- Unsafe driving.
- Failure to use lock-out, tag-out procedures or fall protection.
- Improperly shipped wastes or hazardous products.
- Unsafe customer sites.

# SECURING OPERATIONS GLOBALLY

**RULE TO REMEMBER** » BHGE has no greater responsibility than to protect its people and operations.

## OUR POLICY

We implement rigorous **Security and Crisis Management (SCM) plans** designed to ensure the security of our people and operations globally. Our SCM plans include a process for identifying, and protecting against, the risks posed by man-made or natural incidents that affect our people, facilities, information technology assets and systems, or products, services and supply chain.

**Communicate, as appropriate**, about prevention, emergency response and business continuation with the BHGE community, government officials, the media and the public.

## YOUR ROLE

- **Maintain situational awareness.** Help us protect you, your colleagues and visitors; know your surroundings.
- **Adhere to all entry/exit procedures.** Wear your badge and ensure others do too. Badges provide a visible display that an individual's access is authorized and ensure BHGE facilities are protected from all but AUTHORIZED personnel.

- **Challenge individuals who do not have a badge** and report visitors who are unescorted.
- **Comply with BHGE travel policies.** Make use of the Travel Advisory System when planning travel.
- **Make travel arrangements through your travel center.** Obtain pre-clearances to designated countries.
- **Create and maintain a safe working environment.** Identify and report indicators or incidents of workplace violence to your manager, HR, Security Leader or Ombudsperson.
- **Conduct rigorous background checks** on new hires and contractors as permitted by law.
- **Observe Global Immigration Rules** by ensuring your employees and invited guests comply with global immigration regulations when traveling.
- **Be an active participant** in Crisis Management, Business Continuity, and workplace violence prevention drills and security awareness sessions to ensure you have the knowledge to remain safe at work, home and on the road.



## BE THE VOICE OF INTEGRITY

Involve BHGE Security professionals if you encounter security concerns (for example, thefts, assaults, missing employees or data loss). Report these events, or any other unusual or suspicious activity, to your Security and Crisis Management Leader or at [security.ge.com](https://www.bhge.com/security).



# INTELLECTUAL PROPERTY

**RULE TO REMEMBER** » Every BHGE employee has a responsibility to safeguard BHGE's intellectual property — it is the key to our competitive advantage.

## OUR POLICY

**BHGE aggressively protects its intellectual property (IP)** and enforces its rights against others who take or use BHGE IP without proper authorization.

**BHGE respects valid IP rights** and avoids unauthorized use of IP that belongs to other people or organizations.

**BHGE must own the IP created by its employees** as part of their employment. We require employees to review and sign BHGE's Employee Confidentiality and Innovation Agreement (ECIA).

## YOUR ROLE

- **Classify, label, store and share all BHGE data, information and documents** in accordance with BHGE's Data Classification Policy, and ensure that access to information and documents is granted only to individuals with a legitimate need.
- **Only use or distribute BHGE's proprietary information for the benefit of BHGE**, and not for personal gain.

- **Do not take, access, provide access to, or use any of BHGE's proprietary information or other IP** without authorization after leaving BHGE.
- **Consult with your manager, legal or IP counsel if you have any questions** or concerns regarding how to identify, handle and protect BHGE's IP.
- **Do not bring, access, keep, share or use a third party's proprietary information**, especially proprietary information from a previous employer, without first consulting with and receiving prior approval from your IP counsel.
- **Do not provide BHGE's proprietary information to a third party without the proper internal approval** and the necessary confidentiality agreement with the third party.
- **Do not use any source code or other software from a third party in any BHGE product or as a tool without obtaining prior approval.** Approval to use open source software can be requested through the open source approval tool.



## WHAT YOU SHOULD KNOW

IP is among BHGE's most valuable assets.

Every employee creates, uses, accesses or has access to IP every day.

IP includes patents, trade secrets, trademarks, copyrights and designs and helps protect BHGE's inventions, manufacturing processes, brands, business plans, marketing documents and graphics, software, product shapes, proprietary information and many other things.

Proprietary information is information that is undisclosed, for example, not publicly known or generally available, and that is held in confidence.

# CYBER SECURITY & PRIVACY

**RULE TO REMEMBER** » Respect privacy rights and protect against cyber risks to BHGE information, networks and products.

## OUR POLICY

**BHGE respects individual privacy rights.** BHGE is committed to collecting, handling and protecting Personal Information responsibly, and in compliance with applicable privacy and information security laws and with GE's Commitment to the Protection of Personal Information (GE's Binding Corporate Rules), where applicable.

**BHGE may transfer Personal Information globally** consistent with applicable law.

**BHGE seeks to protect** its networks, systems, devices and information in our possession. It is our policy to use information only for legitimate purposes and to maintain appropriate access controls.

**BHGE's policy is to conduct security testing** on our products prior to release and to monitor for cyber security threats and vulnerabilities.

## YOUR ROLE

- **If you have responsibility for software, IT or product development,** follow BHGE guidelines for Secure Software Development. Ensure appropriate vulnerability testing prior to release, monitor for potential threats and vulnerabilities, and let customers know how to report any potential vulnerabilities they find to BHGE.
- **Communicate as appropriate with customers** about cyber security

issues. Follow BHGE's vulnerability disclosure guidelines.

- **Contact your information security leader** prior to participating in efforts to develop industry standards around cyber security, or engaging an outside firm or individual to perform vulnerability testing.
- **Limit access to BHGE information to authorized individuals** who need it for legitimate business purposes.
- **Prevent unauthorized access, accidental loss, disclosure or destruction of BHGE information:**
  - Secure physical copies and storage areas.
  - Use strong passwords; don't share your password with anyone.
  - Use only BHGE-approved systems and tools for storage, transmission and backup of BHGE information. Do not use personal email, unapproved devices or software to conduct BHGE business.
  - When posting information online, do not disclose Personal Information, IP, trade secrets, proprietary or other commercially sensitive information.
  - Know the signs of phishing and recognize efforts to improperly acquire BHGE information.
- **Consult with your privacy leader** before implementing new or significantly modified processes that use Personal Information, including new software or code.



## BE AWARE

**Personal Information** is any information relating to a directly or indirectly identifiable person (or in some cases, a company); examples include name, address, email, phone, national identifier and credit card number.

Also, Cyber Security & Privacy incidents can happen in a number of ways. Report any risks or incidents at [security.ge.com](https://www.ge.com/security), including:

- Possible loss or theft of data, including lost laptops and other computing equipment.
- Loss, misuse or improper access to data.
- Security issues involving a BHGE product or system.

# CONTROLLERSHIP

**RULE TO REMEMBER** » Be honest, complete and accurate in our accounting, communications and decision-making.

## OUR POLICY

**BHGE accounting and reporting will faithfully reflect the economic substance of the Company's business activities,** consistent with generally accepted accounting principles, standards, and regulations for accounting and financial reporting.

**We will prepare timely, accurate and complete financial information** for use in reports to management, investors, regulators and other stakeholders.

**We will ensure that management decisions are based on sound economic analysis** based on complete facts with appropriate consideration of short- and long-term risks.

**We will comply** with all BHGE policies and applicable laws and regulations relating to the preservation of documents and records.

## YOUR ROLE

- **Maintain effective processes and internal controls** that fairly reflect transactions or events, as well as prevent or detect inappropriate transactions.
- **Protect** BHGE's physical, financial and intellectual property assets.
- **Maintain complete, accurate and timely records** and accounts to appropriately reflect all business transactions.
- **Create documents that are factual, accurate and complete,** and follow Company policies in deciding when to retain and dispose of them.
- **Avoid transactions that diminish share-owner value** even if they enhance near-term financial performance.
- **Never engage in inappropriate transactions,** including those that misrepresent the reporting of other parties such as customers or suppliers.
- **Seek the advice of the Controllership team** if you become aware of a questionable transaction.



## BE THE VOICE OF INTEGRITY

Raise a concern if you become aware of actions, transactions, accounting or reporting that are inconsistent with our controllership values and the protection of BHGE's reputation.

### Red flags include:

- Financial results that seem inconsistent with underlying performance.
- Circumventing review and approval procedures.
- Incomplete or misleading communications about the substance or reporting of a transaction.

# CONFLICTS OF INTEREST

**RULE TO REMEMBER** » Always make business decisions based on what is best for BHGE, never what is best for you personally.

## OUR POLICY

**You have a duty to ensure that nothing interferes with your ability** to make all business decisions in the best interest of BHGE. This means that nothing you do should interfere, or appear to interfere, with your responsibility for objective and unbiased decision-making on behalf of the Company.

**No activity at work or home** should harm BHGE's reputation or good name.

**You have a duty to disclose** if your personal or financial activities may interfere or have the potential of interfering with your allegiance toward the Company.

**Misusing BHGE resources or influence is prohibited.** Even when nothing wrong is intended, the perception of a conflict of interest may have negative effects.

## YOUR ROLE

- **Obtain prior approval** from your manager, HR and legal counsel before hiring, promoting or directly supervising a family member or close friend.
- **Obtain prior approval before accepting officer or director positions** with an outside business or not-for-profit organization. This excludes religious or school (non- University) affiliations.
- **Disclose** financial interests you may have in a company where you could personally affect BHGE's business with that company.
- **Do not** accept gifts other than those of nominal value from suppliers, customers or competitors.
- **Do not** accept personal discounts or other benefits from suppliers or customers if they are not available to the general public or your BHGE peers.
- **While incidental use may be acceptable, do not** use BHGE resources, intellectual property, time or facilities for personal gain. Avoid any activity which creates the potential perception of a conflict between your personal interests and the interests of BHGE.



## WHAT YOU SHOULD KNOW

A conflict of interest is not necessarily a violation of BHGE policy; failing to promptly disclose a conflict is **always** a violation.

Disclosing potential conflicts of interest allows your management team to mitigate risks which may influence your business decisions.

# INSIDER TRADING & STOCK TIPPING

**RULE TO REMEMBER** » BHGE employees are prohibited from using or disclosing material non-public information about BHGE or other companies.

## OUR POLICY

**Do not use or share material non-public information** for financial or any other personal benefit.

## YOUR ROLE

- **Never buy or sell the securities (such as stocks, bonds or derivatives) of BHGE or any other company**, either directly or through family members or other persons or entities, **while you are aware of inside information** that could make the price of those securities go up or down.
- **Do not recommend or suggest that anyone else buy or sell the securities of any company — including BHGE — while you have material inside information** about that company.
- **Only share material inside information on a need-to-know basis.**
- **Avoid trading BHGE securities around the time of a significant announcement.**

- **Avoid sharing material inside information with anyone outside BHGE unless it is necessary** for BHGE's business activities and proper controls are in place (such as a non-disclosure agreement with a supplier).
- **Do not serve as an independent consultant or expert outside of BHGE** on business matters within the scope of your BHGE employment.
- **Refrain from discussing BHGE business with family and friends.**
- **Follow additional requirements for the buying and selling of securities** if required by the nature of your job or business (for example, employees who pre-clear personal trades).



## WHAT YOU SHOULD KNOW

**Inside Information** is information you may learn in your job about BHGE or other companies that has not been made public.

**Using material inside information** for your financial or other personal benefit, or sharing it with others, **violates BHGE's insider trading policy and may violate the law.**

**Inside information is material** if a reasonable investor would consider it important in deciding to buy, hold or sell securities, or if publication would likely affect a company's stock price. Examples include:

- Financial forecasts.
- Earnings/dividend announcements.
- Proposed acquisitions or divestitures.
- Strategic plans.
- Regulatory actions.
- Changes in top management.

**Stock tipping** means sharing inside information about BHGE or another company — for example, to a relative, colleague, or friend — to enable the person to buy or sell stock or other securities of the company on the basis of such information.



# KEY QUESTIONS OF INTEGRITY

*The Spirit & The Letter* is not a substitute for your good judgement, and it cannot cover every conceivable situation. You should be alert to signs that you or your colleagues are in an integrity gray area and ask yourself three simple questions if you have any doubts about what you should do.

**01**

**How would this decision look to others within BHGE and externally?**

**02**

**Am I willing to be held accountable for this decision?**

**03**

**Is this consistent with BHGE's Code of Conduct?**

**Remember:** Act if you see an issue. Ask if you're not sure.

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