

HR Policies and Compliance

Society of Corporate Compliance and Ethics
Le Hammer, Senior Labor & Employment Counsel

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Introduction

- Labor and employment at Baker Hughes
- Why we fall under the Compliance function within the legal department



Equal Employment Opportunity & Anti-Harassment

- Identifies the areas where we pledge non-discrimination and harassment
- Provides definitions for harassment and sexual harassment
- Describes the duties of both employees and supervisors and managers
- Outlines the Complaint process, investigation process and closure of the complaint.
- Anti-retaliation provision

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Avenues for Reporting Non-Compliance with Policies

- Report to Immediate Supervisor
- HR Department
- L&E Legal Department
- Business Help Line
- Code of Conduct

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Business Help Line

- Independent, global, third party, multi-lingual service dedicated to handling general Code of Conduct questions or concerns, 7 days a week, 24 hours a day.
- Investigation process
 - When a matter reaches our department (either from HR or the Help Line) it is logged into our database for tracking and reporting.
 - Upon receipt of the complaint, we “triage” to determine if the complaint requires processing that differs from our normal procedure
 - If no, then we partner with our HR colleagues around the world for investigation of the complaints.
 - If yes, then L&E Counsel determines best approach.

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Code of Conduct

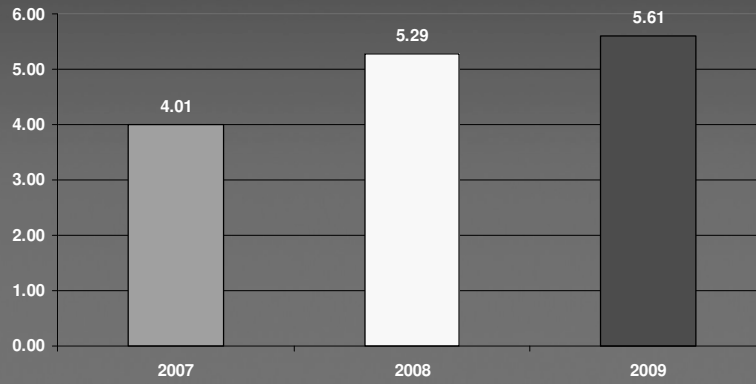
- Annual questionnaire
- Process the same as the Business Help Line

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Business Help Line Statistics

L&E HelpLine Matters
% Filed Per 1,000 Employees (Worldwide)

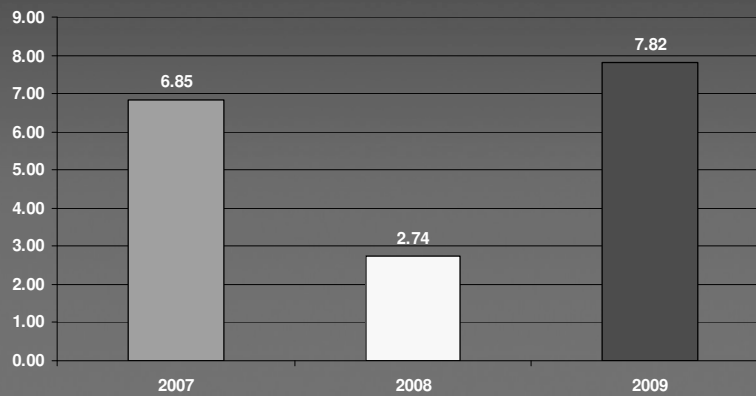


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Code of Conduct Statistics

Code of Conduct Matters
% Filed Per 1,000 Employees (Worldwide)



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Dramatic Increases in Reporting

- Economic downturn
- Layoffs
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Global Discipline Policy

- Disciplinary Procedure
 - Employee Notification
 - Review or Investigation
 - Factual Determination
 - Outcome of Review or Investigation
 - Violation of Business Code of Conduct (serious offenses)

Global Discipline Policy

- Disciplinary Options
 - Coaching/Verbal Warning
 - Training
 - Administrative Sanctions
 - Written Warning/Reprimand
 - Final Written Warning/Reprimand
 - Suspension
 - Demotion/Change in Job Responsibilities
 - Termination

Questions?

Thank you!

Le Hammer

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Board of Legal Specialization