

Human Resources Policies & Procedures



Section 1100 - Ethics

Policy: 1110
Subject: Helpline

Effective Date: December 2004
Revised Date: November 2017

I. PURPOSE & SCOPE

- A. To support employee efforts towards quality work performance and to offer a readily accessible means for obtaining assistance on a daily basis. Assistance covers relevant business dimensions within the organization: technical; administrative; legal (regulatory standards); and ethical (e.g., business conduct guidelines).
- B. This policy is applicable to all departments, all divisions and all employees of Core Laboratories.

II. REFERENCES

NA Helpline Inquiry and Reporting form
1105 Ethics
1115 Ethics Investigation

III. DEFINITIONS

- A. **Helpline** – A common reporting system, administered in house, giving anonymous telephone / email / fax access to employees seeking to report possible instances of wrongdoing.
- B. **Compliance Officer** – The high level manager, autonomous from operations, with responsibility for operating the Helpline and authority to act upon needs identified by the Helpline.

IV. RESPONSIBILITY

4.1 Compliance Officer (CO)

- 4.1.1 The CO has the authority to direct the resources necessary to operate the Helpline, including (but not limited to):
 - toll-free phone line with voice mail (U.S. and Canada only)
 - toll-free fax line (U.S. and Canada only)
 - unique Email address (ethics@corelab.com)
 - alternate phone line (with voice mail) and fax

- 4.1.2 The CO has the responsibility to direct resources within the Company to inform and educate employees about the Helpline.
 - 4.1.3 The CO has the responsibility for managing the Helpline.
- 4.2 Employees

Employees can use the Helpline to raise issues and ask questions on acceptable, compliant and ethical business conduct, as well as any technical, administrative or regulatory issues that cannot be addressed at their facility.
- 4.3 Management
 - 4.3.1 The location manager is responsible for ensuring that the Helpline poster is posted in clear view and that the Standard Helpline Inquiry and Reporting forms are available to all employees.
 - 4.3.2 Managers and supervisors are responsible for allowing their employees access to the Helpline.

V. PROCEDURE

A Helpline Poster shall be posted in every office giving specific details of how to use the Helpline, including phone/fax numbers, email and mailing addresses.

- 5.1 Access Using Paper Forms
 - 5.1.1 Employees have the option of using the Helpline Inquiry & Reporting Form, or writing a description of an issue including the information listed under Section 5.5.
 - 5.1.2 Forms will be placed in a location known and accessible to all employees at a facility. The location will be either sufficiently private or multi-functional so that employees concerned about anonymity can be comfortable accessing the forms. Simple instructions will be posted in the immediate vicinity.
 - 5.1.3 The mailing address and the fax number for the Compliance Officer is printed on the form. Completed forms may be faxed, mailed via interoffice mail or, at the sender's discretion, an outside mail services (UPS, FedEx, etc.).
- 5.2 Access Via E-Mail
 - 5.2.1 The Compliance Officer is accessible via a published/posted E-mail address (ethics@corelab.com).
- 5.3 Access Via Telephone
 - 5.3.1 The Helpline phone number is a toll-free number (877-CORELAB) that is the same number for all US and Canadian locations. For all locations outside the US and Canada an alternate phone number can be used.
 - 5.3.2 The Helpline is equipped with voice mail service to handle calls made outside normal business hours and when the CO is otherwise unavailable. The voice mail message will indicate alternate means for assistance or reporting.

- 5.4 Anonymity
 - 5.4.1 The anonymity and confidentiality of employees contacting the Helpline will be preserved, unless indicated otherwise in writing by the employee.
 - 5.4.2 If an e-mail is sent to the Helpline or CO, i.e., via the Internet, it is the responsibility of the sender to protect his/her identity if so desired.
 - 5.4.3 Employees not wishing to remain anonymous should provide a name and means of contact (phone number, address, and or e-mail).
- 5.5 Inquiry, Report or Request Content
 - 5.5.1 Employees may use the Helpline Inquiry and Reporting Form, or follow the guidelines below.
 - 5.5.2 Information that will aid the Helpline in responding to employee needs includes:
 - a. a description of situation or question;
 - b. an indication of time sensitivity of the issue; and
 - c. supplemental information, if appropriate (e.g., test results, customer specifications, copies of documents as evidence of the unacceptable practices or observed unethical behavior / acts).
 - 5.5.3 Reports of events should include:
 - a. a description of the observations made;
 - b. employees, customers or vendors involved;
 - c. evidence supporting alleged unethical behavior / act; and
 - d. date and time of the event.
- 5.6 Responses from the Helpline
 - 5.6.1 Once an inquiry, request, or report is received at the Helpline, the CO evaluates the content and nature of the communication to determine whether it necessitates: (1) the initiation of an ethics investigation; (2) a direct response to the employee from the CO; (3) a referral for further clarification to a designated staff member; or (4) another type of response. Other responses may include:
 - a. clarification of an existing policy or procedure;
 - b. amendment to an existing policy or procedure;
 - c. development of a new policy or procedure;
 - d. initiation of special training;
 - e. mediation between two or more parties internal and/or external to the Company;
 - f. customer contact.
 - 5.6.2 Helpline staff will give employees making contact clear indication of when responses can be expected and how. The CO will establish a system for tracking responses to and actions taken on employee inquiries or reports.
 - 5.6.3 Helpline activity of use to other employees may be publicized within the Company at the discretion of the CO, in accordance with company policies and procedures. Publicity may be achieved:
 - a. by written documentation;
 - b. verbally, through training; or via email