

Code of Business Conduct



Message from the Chairman, President and CEO



Jeff Miller
Chairman, President and CEO

Dear Colleagues,

For nearly a century, Halliburton has collaborated and engineered solutions to maximize asset value for our customers. This hard work has yielded consistent, long-term success. We continue to gain new customers and expand relationships with existing customers while developing advanced technologies and digital solutions. In all corners of the world and across our organization, we have repeatedly prevailed over our competition – and most importantly, we have achieved our success the REDWay – responsibly, ethically, and diligently.

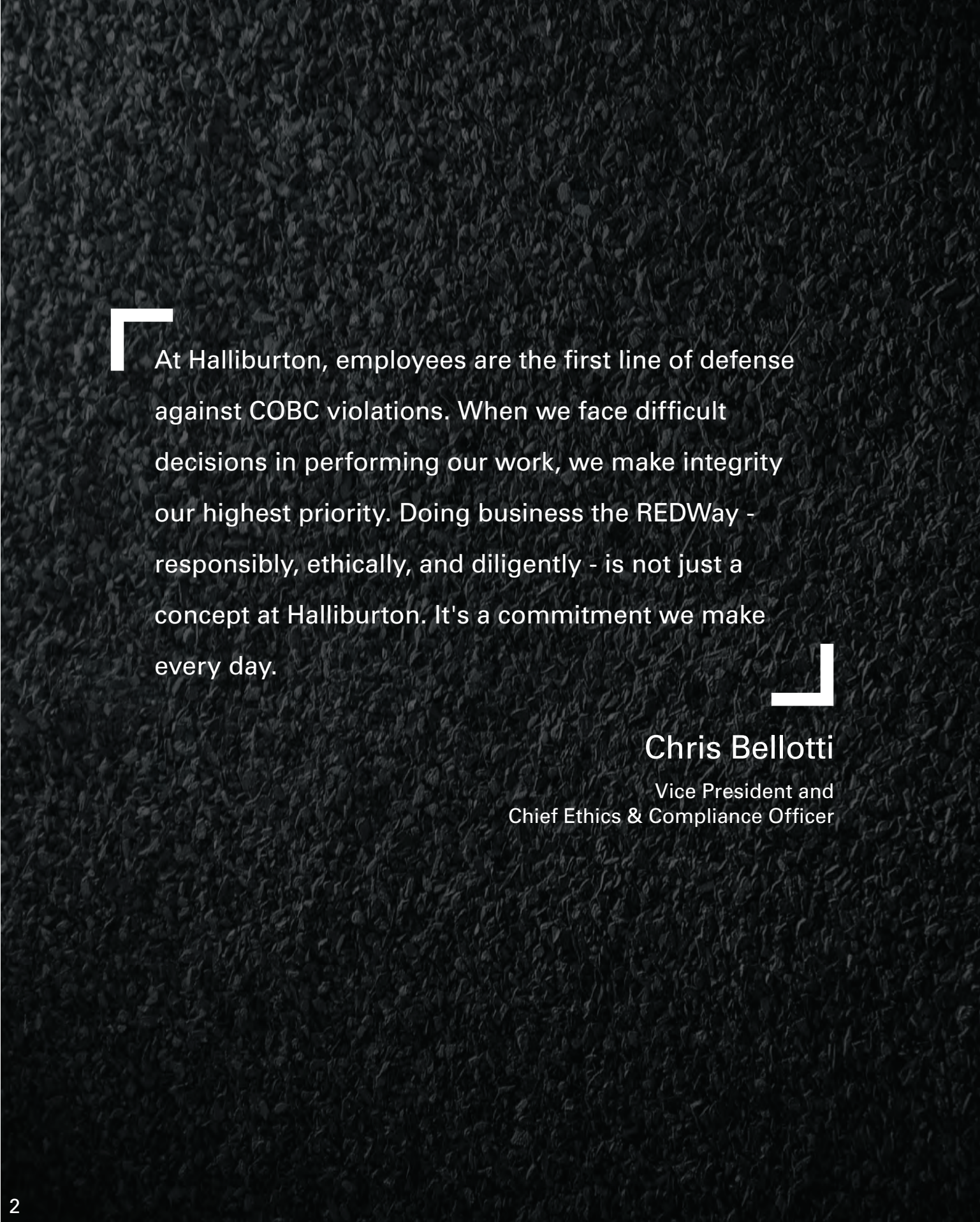
No matter your role in the organization, attributes like integrity, creativity, and respect are what make Halliburton successful. When we face difficult decisions during the course of our work, we make integrity our highest priority and demand the same from those around us. We do not sacrifice honesty, fairness, or respect in pursuit of profits.

The Halliburton Board of Directors, the senior management team, and I are committed to our Company's core values. We expect that same commitment from you, and we cannot waiver in our commitment to the values that have defined Halliburton since the founding of the Company – integrity, safety, collaboration, competition, creativity, reliability, and respect.

Our customers know that doing business the REDWay is not just a concept at Halliburton – it's something we do every day and is reflected in our Code of Business Conduct, which applies equally to all employees, directors, and officers of the Company, and to all third parties that conduct business on behalf of Halliburton. You are Halliburton's first line of defense against violations of the Code of Business Conduct. If you see or suspect that unethical behavior has occurred, come forward with your concerns. Contact the Global Ethics & Compliance Department. Call the Ethics Helpline. Above all, do not abandon your responsibility because of fear. We will not tolerate retaliation against anyone who raises issues in good faith. Remember, we are all accountable for upholding and abiding by the Code of Business Conduct.

We pride ourselves on being the execution company. When it comes to ethics and integrity, there can be no compromises, no excuses. Thank you for your help in delivering client-centered results the REDWay.

A handwritten signature in black ink that reads "Jeff A. Miller". The signature is stylized with a large, cursive "J" and "M".



At Halliburton, employees are the first line of defense against COBC violations. When we face difficult decisions in performing our work, we make integrity our highest priority. Doing business the REDWay - responsibly, ethically, and diligently - is not just a concept at Halliburton. It's a commitment we make every day.

Chris Bellotti

Vice President and
Chief Ethics & Compliance Officer



The Purpose of the Code of Business Conduct

At Halliburton, we are committed to conducting business with the highest levels of integrity, in full compliance with both the letter and spirit of the law. As part of this commitment, we must do the right thing and make the right choices as we undertake our daily activities. This includes helping to foster an environment where we treat each other respectfully, deliver world-class service to our clients, compete honestly and take pride in our Company.

It is not always easy to identify the right course of action. In situations where additional direction is required, the Code of Business Conduct (COBC) serves as a practical guide to help you make the right legal and ethical choices. Together with the policies and business practices referenced

here, the COBC is the foundation of Halliburton's core value of Integrity and our global ethics and compliance practices.

The COBC highlights the important legal, ethical and regulatory requirements that govern Halliburton's global operations. It also provides resources for additional information and guidance on how to report potential violations.

You must read, understand and abide by the COBC. We expect your wholehearted support of the values and principles it contains.

Our Commitment to Honest, Fair Dealing

The Halliburton Board of Directors has adopted the COBC to ensure honest and ethical conduct; compliance with applicable laws and regulations; and fairness with customers, suppliers, competitors and employees. We value good citizenship and do not take advantage of others through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair practices.

The COBC applies wherever we do business, equally to all Halliburton directors and employees, including officers, as well as employees of Halliburton's subsidiaries and affiliates. We also expect all suppliers, contract employees, agents, consultants and others acting on our behalf to abide by the principles in the COBC.

Compliance with the Law

It is our policy that all of our directors, employees, and anyone acting on our behalf comply with the COBC and all applicable laws in each place where we do business. We are a U.S. company and, in some situations, the COBC or the law of the U.S. may conflict with the applicable law of another country. In such cases, you should seek guidance from the Global Ethics & Compliance Practice group in the Law Department to resolve the conflict.

Anyone who violates the COBC or the law will be subject to disciplinary action, up to and including termination of employment.

Introduction

Using the COBC

The COBC provides a framework to help guide your behavior. It does not address every situation you may encounter, but is meant to supplement your own good judgment, common sense and knowledge of what's right. As such, any conduct that is unethical or illegal could subject you to appropriate discipline, even if it is not specifically mentioned in the COBC.

You should reference the COBC whenever you have a question or concern about compliance-related issues or what constitutes ethical and lawful conduct. Note that each section of the COBC also contains references to Halliburton policies and business practices that provide additional detail on specific topics.

If you ever have any questions about the COBC or about how to handle a specific situation, you should speak with your supervisor, Human Resources, your Local Ethics Officer (LEO), Global Ethics & Compliance, the Ethics Helpline – or read the Halliburton policy or business practice that relates to the subject of your question.

The Chief Ethics & Compliance Officer (CECO) and the entire Global Ethics & Compliance team are always available to answer your questions or discuss any potential COBC violations that you would like to bring to their attention. Please do not hesitate to contact them in person, by phone or through email at any time.

Our Responsibilities

Your Responsibilities as an Employee

- Understand and comply with Halliburton's COBC, policies and business practices.
- Comply with all applicable laws and regulations.
- Seek guidance whenever you have questions.
- Promptly report any suspected violations of the COBC to your supervisor, your LEO, Human Resources, Global Ethics & Compliance or the Ethics Helpline.
- Take responsibility for your own conduct and take pride in your actions.





Take Note!

Before determining a course of action where the right choice may not be clear, always ask yourself:

- Is it legal?
- Is it permitted by the COBC, policies and business practices?
- Is it the right thing to do?
- Would I be proud to have friends and family know about my choice?

If you are still unsure or have additional concerns, you should contact your supervisor, your LEO, Human Resources, or Global Ethics & Compliance before acting.

Your Responsibilities as a Supervisor

- Be a positive role model.
- Ensure that your employees understand and comply with Halliburton's COBC, policies and business practices.
- Ensure that your employees understand and comply with all applicable laws and regulations.
- Emphasize the importance of the COBC and reinforce Halliburton's commitment to conducting business the REDWay – responsibly, ethically and diligently.
- Encourage open communication with employees and provide guidance and feedback in response to their questions and concerns.
- Understand when to escalate issues, report violations and get assistance from available resources.
- Ensure that Halliburton's zero-tolerance position on retaliation against reporters is strictly enforced.



Reporting and Investigation

Asking Questions and Reporting Violations

We all have a duty to help the Company uncover and address illegal activities and promote appropriate action on ethical issues. If you become aware of behavior that violates, or appears to violate, the COBC, Halliburton policies or business practices, or applicable laws and regulations, you have a responsibility under the COBC to report the behavior promptly.

There are a number of ways to report issues or ask questions. No matter which avenue you select, your issue will be treated with the same high level of seriousness and importance. Contact information for Global Ethics & Compliance reporting, including the toll-free numbers for our Ethics Helpline, is located on the last page of this booklet.

Where the law allows, you may report violations anonymously through our Ethics Helpline or via email. Please understand, however, that it may be difficult or impossible for Halliburton to thoroughly investigate reports that are made anonymously. Therefore, we encourage you to consider sharing your identity to enable follow-up and improve our fact-gathering ability. If you do decide to remain anonymous, please provide as much information in your report as possible.

Reference

Company Policy 3-02120, "Administration of the Code of Business Conduct"



Take Note!

Even after reading the COBC and related policies, you may still have questions about how to proceed, or whether you should report certain behavior. Do not hesitate to request advice from the many valuable Global Ethics & Compliance resources at Halliburton that are available to help you.

These include:

- Global Ethics & Compliance
- Your Local Ethics Officer (LEO)
- Human Resources
- The Ethics Helpline

Our Commitment to Non-Retaliation

We do not tolerate any type of retaliation against an employee for making a report or participating in an investigation in good faith. Such actions may also be protected in accordance with the Sarbanes-Oxley Act of 2002 and the Dodd-Frank Wall Street Reform Act and Consumer Protection Act. Acting in “good faith” means reporting

conduct you suspect may violate the COBC. We encourage you to disclose all of the information you have, so that the report is as complete and accurate as possible. Anyone who retaliates will be subject to disciplinary action, up to and including termination of employment.

Investigations and Confidentiality

We will respond to all reports as promptly as possible. We will treat reported information in a confidential manner to the fullest extent practical while still enabling a thorough investigation.

The appropriate individuals within the Company will be assigned to promptly investigate all reports.

In certain circumstances, outside investigators and legal counsel may also be involved. As an employee, you are expected to cooperate fully with all internal and external investigations or audits. This includes responding to investigations truthfully and disclosing all relevant information that you have.

Consequences of Violating the COBC

At Halliburton, Integrity is a core value, and we take COBC violations very seriously. Failure to follow the COBC could result in disciplinary action, up to and including termination of employment, and legal action in some cases.



Take Note!

Retaliation is defined as any adverse action taken against employees because they exercised their protected rights. A few examples are:

- Creating an uncomfortable or hostile work environment
- Decreasing or marginalizing responsibilities or reporting relationships
- Transferring an employee
- Denying or excluding an employee from training and development opportunities

What can I expect after I make a report in good faith?

After making a report to any Global Ethics & Compliance resource, you can expect the following:

- Your report will be taken seriously.
- Your report will be investigated promptly and thoroughly.
- Your report and your identity will be treated confidentially to the extent practical or to the extent permissible by law.
- Your report will be escalated appropriately.
- If you have disclosed your identity, you will receive follow-up communications regarding the receipt and final closure of your report.
- You will not be subject to any retaliation as a result of your good-faith report.

I believe that I may have witnessed a violation of the COBC, but I am not sure. What should I do?

If you suspect a violation of the COBC, you must report it. The earlier the issue is reported, the sooner it can be addressed. Even if you do not have all the facts, you should discuss what you know of the suspected violation with your supervisor, your LEO, Human Resources, Global Ethics & Compliance – or call the Ethics Helpline. By doing so, you will have fulfilled your obligation under the COBC and will help ensure that we can carefully review the issue to determine if a violation has occurred.

Company policy prohibits retaliation against anyone who reports a concern in good faith. Acting in “good faith” means that you report conduct you suspect may violate the COBC. We encourage you to disclose all the information you have so that the report is as complete and accurate as possible.



Relationship with the Company

The Halliburton community is made up of more than 50,000 employees in approximately 80 countries, representing 140 nationalities. Ensuring that those employees work in the safest conditions possible, are treated with fairness and dignity, and operate in an environment of integrity is a priority. It's necessary for the well-being of the Company, and, more importantly, it's necessary for the well-being of every employee.

Creating and maintaining such an environment is not up to any single person, or group, within the Company. It requires the support and commitment of every member of our team. From the chemist in India, to the engineer in Angola, the secretary in Canada, and the Business Development manager in Brazil – we all play a role in creating such an environment.

This commitment is outlined in the “Relationship with the Company” section of Halliburton’s COBC, which discusses the Company’s policies and guidelines related to:

- Employment and the Workplace
- Health, Safety and Environment (HSE)
- Conflicts of Interest
- Use and Public Disclosure of Material Nonpublic Information
- Financial Integrity, Reporting and Disclosure
- Protection of Company Assets
- Privacy and Data Security

These policies serve as a guide. It is the responsibility of every employee to make a commitment to Halliburton, and to one another, to work with honesty, integrity, fairness and safety.

Employment and the Workplace

We Prohibit Harassment

Everyone deserves to work in an environment where they feel welcome and secure. That is why Halliburton fosters an environment that is free from harassment and disrespectful behavior.

Our Company will not tolerate any form of harassment or behavior that creates an intimidating, hostile or offensive work environment. A few examples of harassment include:

- Sexual, in the form of unwelcome physical contact or gestures
- Inappropriate comments and jokes
- Offensive or explicit images
- Racial or ethnic slurs
- Bullying or intimidation

If you feel that you have been harassed, or have witnessed harassing behavior, speak with the offending party or report the issue immediately. Please keep in mind that it is not harassment or retaliation for a manager or supervisor to enforce job performance.

We will not tolerate any type of retaliation against an employee for making a report or participating in an investigation in good faith.

We Encourage an Inclusive Workplace

We value a workforce comprised of individuals with diverse skills, perspectives and backgrounds. We make all employment and promotion decisions based upon an individual's merits, qualifications and performance. No decisions are based on discriminatory factors such as race, color, religion, gender, sexual preference/orientation, citizenship, marital status, veteran status, genetic information, national origin, gender identity, age, disability, or any other status protected by law or regulation.

Halliburton abides by all laws and regulations that govern employment practices wherever we conduct business. We are committed to enforcing our policies, business practices and procedures that assure fair employment, including equal treatment in hiring, promotion, compensation, training, disciplinary action and termination of employment.

If you reasonably suspect any form of inappropriate discriminatory behavior in the workplace, you should report it immediately.

One of my supervisors has asked me several times to meet for drinks after work. I have repeatedly told him I am not available in the evenings, but he keeps asking. Last week, he mentioned that if I joined him for drinks, it might go a long way in getting me the raise I have been promised. It doesn't seem right that I have to go out for drinks with him to get the raise that I deserve. Am I overreacting?

No, you are not overreacting. Your supervisor should not make you feel uncomfortable or imply that your refusal to comply with his request can impact your potential for a raise. You should report this behavior to one of your compliance resources immediately.

Remember that the Company strictly prohibits retaliation for claims made in good faith.

Workplace Misconduct

We support an environment that promotes the health and well-being of our employees.

We do not tolerate the sale or use of illegal drugs or abuse of alcohol in the workplace. We expect that prescribed medications will be used in a way that does not adversely impact job performance or the health and safety of fellow employees.

Halliburton strongly prohibits all acts of violence and threatening behavior in the workplace. We prohibit the possession of firearms; any explosives not designed, used and properly controlled by authorized Company personnel; and other weapons on Company property or while conducting Halliburton business, unless this prohibition violates local law.

If you encounter a situation involving workplace misconduct, including violence or threats, you should immediately contact your supervisor, Human Resources, Corporate Security, Global Ethics & Compliance or the Ethics Helpline.

A co-worker I have known for many years was recently passed over for a promotion. While he has always been known for having a temper, he has never been violent or threatening. Lately, however, his talk about "getting back" at our supervisor is concerning me. What should I do?

Any threatening behavior or language at work is prohibited. You should report the incident immediately, even if you are unsure of the person's true intent. The physical safety of our employees is of the utmost concern, and Halliburton will take every step possible to protect employees' well-being.

References

Company Policy 3-10040, "Halliburton Global Drug, Alcohol and Substance Abuse Prevention"	Company Policy 3-13050, "Equal Employment Opportunity"
Company Policy 3-10041, "U.S. Substance Abuse Prevention"	Company Policy 3-13060, "Harassment"
Company Policy 3-10200, "Weapons"	Company Policy 3-15470, "Prohibited Working Relationships"
Company Business Practice 4-11239, "Guidelines for Disciplinary Measures"	Company Policy 3-15550, "Preventing Workplace Violence"
Company Business Practice 4-11310, "Medical Leaves of Absence"	Company Business Practice 4-17031, "Reportable Security Incidents"
Company Business Practice 4-11313, "Medical Examinations – U.S."	Company Policy 3-90113, "Human Rights"

Health, Safety and Environment (HSE)

Commitment to a Healthy, Safe and Environmentally Sound Workplace

Halliburton has an unwavering commitment to HSE. This means that HSE is everybody’s responsibility and each of us must comply fully with applicable laws while understanding and following the Company’s HSE policies, business practices and standards. You must be aware of, and fulfill, any HSE reporting requirements related to your role in the Company.

The Stop Work Authority (SWA) Program gives all employees the authority and responsibility to intervene or stop a task without fear of reprisal if they observe an unsafe hazardous action or condition at the work site or have concerns regarding the control of an HSE risk.

If you are unsure which HSE rules and procedures apply to your position, review the

related HSE policies and standards and speak with your supervisor immediately.

If you become aware of workplace conditions or practices that could jeopardize the health and safety of people or harm the environment, or if you have any questions or concerns about how our operations impact human health or the environment, contact your supervisor, your LEO, Human Resources, your local HSE resource, Global Ethics & Compliance or the Ethics Helpline immediately.

It is up to every employee to reinforce our HSE culture by weaving safety, caution and responsibility into everything we do.

Sustainability

In addition to complying with all applicable HSE laws and regulations, Halliburton is committed to sustainability in our operations. This includes taking proactive steps to help protect human health and the environment, as well as complying with our other listed Guiding Principles for Sustainability.

We strive to provide products and services that have minimum environmental impact. We also seek to become ever more efficient in our consumption of energy and natural resources by focusing on recycling and responsible disposal.

References

Company Policy 3-10042, “Global Health, Safety, and Environmental Standards and Guidelines”
Global HSE Standards

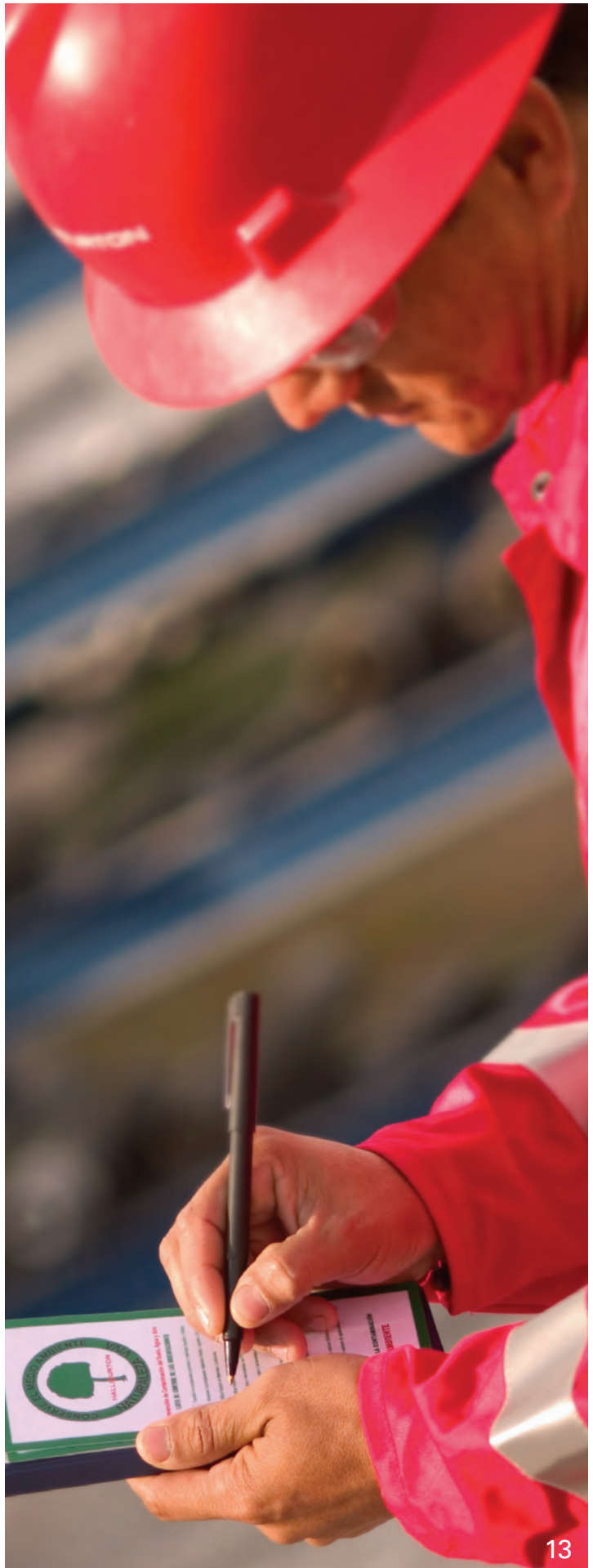
Stop Work Authority
Guiding Principles for Sustainability

I was injured while working in the field, but my supervisor is pressuring me not to report it and is asking me to perform light-duty work instead. What should I do?

You should report your injury in accordance with our Global HSE Standards. Halliburton seeks to maintain a safe and healthy work environment for all employees and strives to meet stringent safety requirements. A supervisor must never pressure an employee to cover up a workplace injury as a means of achieving safety goals. Similarly, light-duty work must be recommended by a treating physician and is not an alternative to a properly filed injury report. Please also keep in mind that you are not required to go to your personal physician and pay a deductible if your injury is work-related.

If you are being pressured to not report an injury, reach out to:

- Global Ethics & Compliance
- Your LEO
- Human Resources
- The Ethics Helpline



Conflicts of Interest

We are responsible for acting in the best interest of the Company at all times. As Halliburton employees, we must not participate in activities that compromise our objectivity or activities that create, or even appear to create, conflict between our own interests and the interests of the Company.

It is important that you disclose actual and potential conflicts of interest to your supervisor, Human Resources or Global Ethics & Compliance in writing so that the conflict can be resolved or avoided. Supervisors and Human Resources are responsible for contacting Global Ethics & Compliance to obtain a conflict of interest assessment if an employee discloses a potential conflict. Certain key employees may be required to complete an annual Statement of Compliance & Conflict of Interest Disclosure.

Conflicts of interest include those stemming from financial interests, corporate opportunities, family and personal relationships, and outside employment and board memberships.

Financial Interests

Conflicts of interest can occur when you, your family or someone with whom you have a close personal relationship has a financial interest in an organization that does business with, seeks to do business with, competes, or seeks to compete with, Halliburton.

If you have a question whether a financial interest in an organization that does business with, or competes with, Halliburton, causes a conflict you should contact your supervisor, Human Resources or Global Ethics & Compliance for guidance. Supervisors and Human Resources are responsible for contacting Global Ethics & Compliance to obtain a conflict of interest assessment if an employee discloses a potential conflict.

Corporate Opportunities

We all have a duty to protect the Company's interests and to advance them whenever possible. Always refrain from using the Company's property, information or your position within Halliburton for personal gain.

- You must never take personal advantage of a business opportunity if it is possible that Halliburton may also have an interest in the opportunity, unless the Company has already been made aware of, and declined, the opportunity in writing.
- You should not take personal advantage of a business opportunity that is discovered using Halliburton property or information, or through your position with the Company.
- Intellectual property developed by an employee during working hours belongs to, and is an asset of, the Company, not the employee.

Family and Personal Relationships

Halliburton selects all employees, vendors, suppliers and business partners on the basis of their qualifications and not on the basis of any family connections or personal friendships. You should refrain from participating in, or attempting to influence, any decisions relating to Company business dealings with individuals with whom you have a close personal relationship.

Additionally, you may not hire, supervise, report to, or have influence over individuals with whom you have a close personal relationship.

If someone with whom you have a close personal relationship works for one of Halliburton's competitors or an organization with which Halliburton is considering doing business, you must disclose this information to your supervisor, Human Resources, or Global Ethics & Compliance. Supervisors and Human Resources are responsible for contacting Global Ethics & Compliance to obtain a conflict of interest assessment if they become aware of a potential conflict.

Outside Employment and Board Memberships

Outside employment with a Halliburton competitor, supplier or customer almost always creates an impermissible conflict of interest. Employees must not compete with Halliburton and must not act as consultants, employees or board members for any Halliburton competitors or partners without Halliburton's express written authorization.

Outside work can also create a conflict of interest when it interferes with your employment responsibilities or impairs your job performance at Halliburton. When considering work outside of Halliburton, discuss it with your supervisor, Human Resources or Global Ethics & Compliance to ensure that it does not create an actual or perceived conflict of interest. Supervisors and Human Resources are responsible for contacting Global Ethics & Compliance to obtain a conflict of interest assessment if an employee discloses a potential conflict.

References

Company Policy 3-02560, "Conflicts of Interest"
Company Policy 3-05000, "Outside Business Directorships"
Company Policy 3-15470, "Prohibited Working Relationships"
Company Policy 3-15760, "Related Persons Transactions"
Statement of Compliance and Conflict of Interest Disclosure



Take Note!

People with whom you have a "close personal relationship" may include:

- Spouse, partner or person you are dating
- Immediate family members (parents, son/daughter, brother/sister, grandparent/grandchild)
- Mothers- and fathers-in-law, sons- and daughters-in-law, brothers- and sisters-in-law
- Cousins, uncles, aunts, nieces, nephews
- Any person living in the same home with you

Can I work part-time for my brother-in-law's construction business after work and during my days off?

Most likely. However, outside work can present a conflict of interest if it involves competing with any of Halliburton's products or services, working for a Halliburton vendor, or if it will adversely affect your ability to perform your Halliburton duties in any way. Before engaging in any outside work, discuss the nature of the work with Global Ethics & Compliance to determine whether it presents a conflict of interest.

Use and Public Disclosure of Material Nonpublic Information

It is both illegal and a violation of the COBC for Company employees to trade securities of any company (including Halliburton) based upon their knowledge of material nonpublic information (“inside information”) about that company. If you are aware of inside information concerning Halliburton, you must generally wait until the end of business on the second business day after the information has been properly disclosed to the public before buying or selling Halliburton securities. More restrictive rules on trading Halliburton securities apply to certain key employees, officers and directors.

Inside information includes anything that could affect a person’s decision to trade securities that has not become generally known to the investing public. Examples include:

- Significant new products and offerings
- Potential mergers, acquisitions, dispositions and joint ventures
- Status of significant contracts, including cancellations, renewals and entry into contracts
- Major changes in management
- Government investigations
- Communications with regulators
- Unannounced financial results
- Pending lawsuits and legal settlements

If you are aware of inside information concerning Halliburton or another company, you must not disclose it to anyone other than individuals whose positions require them to know the information, until it has been publicly disclosed.

You must not disclose inside information concerning the Company to others, including family members (“tipping”), as they might trade based on, or otherwise profit from, that information. Likewise, if you have knowledge of inside information about a non-Halliburton company, you must also refrain from recommending that another person trade securities of that company.

If you have any questions about insider trading laws or your obligations under the COBC, consult Global Ethics & Compliance or the Public Law Practice group in the Law Department before trading securities.

Reference

Company Policy 3-02550, “Use of Material Nonpublic Information, Securities Trading Windows, and Hedging and Pledging of Company Securities”

Financial Integrity, Reporting and Disclosure

Internal Financial Controls

As a publicly traded company, Halliburton is required by law to ensure that:

- All transactions, assets and liabilities have been properly recorded on a timely basis;
- All transactions have been authorized by management and made in accordance with applicable laws and regulations; and
- Company assets are adequately safeguarded.

We must also ensure that all transactions, assets and liabilities are recorded in accordance with U.S. Generally Accepted Accounting Principles (GAAP) and, if applicable, other local or statutory principles.

In connection with these requirements, you must always obtain sufficient documentation to support all information entered into the Company's books, records and accounts. You should not structure or record any transaction, asset, liability or reimbursement request, or engage in any other conduct in an attempt to circumvent Halliburton's system of internal controls and related processes.

Peter makes numerous business trips for the Company throughout the year and struggles to keep his receipts in order. Often, he is unable to obtain receipts for some of his business meals or the receipts are lost. Peter is confident the Company owes him reimbursement for these business expenses, so he creates receipts to document his expense reports.

Falsifying records, including expense reports, is a serious COBC violation. The Company understands that anyone might lose a receipt from time to time and there is a process in place to handle that circumstance. Peter should provide his supervisor with the relevant details of the expense, such as the amount, location, date, and the names and companies of others to whom the expense relates. His supervisor will review the information and, if the circumstances are reasonable, approve the expense in writing, which should be submitted with the expense report.

Also, Peter needs to understand that it is his personal responsibility to manage his expense records and that his supervisor will not approve undocumented expenses repeatedly.

Disclosure and Financial Reporting

As a publicly traded company, Halliburton must comply with numerous securities laws and regulations. All of our public statements, including our press releases, reports, financial communications and public filings, must be free of inaccurate or misleading information. Any failure to provide the New York Stock Exchange (NYSE), the U.S. Securities and Exchange Commission (SEC) or any other governmental authority with accurate and timely financial statements, filings or communications could result in civil and criminal penalties for both the Company and the employees involved.

All of us share in the responsibility of ensuring that our public communications and disclosures are fair, accurate, complete and timely. However, senior officers, finance personnel, and accounting professionals play a particularly important role in this effort; they must always act in good faith and with due care, while adhering to the requirements of the COBC and applicable securities laws and regulations.

Each director, officer and employee who is involved in the Company's disclosure process must:

- Ensure careful drafting, review and analysis of all prospective disclosures for accuracy and completeness;
- Never knowingly misrepresent, or cause others to misrepresent, details about the Company, including its financial records, to government regulators, auditors, shareholders or anyone else;
- Understand and adhere to the disclosure requirements applicable to the Company; and
- Understand and adhere to the Company's internal controls over financial reporting and disclosure controls and procedures.

I have had a great year and have already made my sales number. One of my clients just called and inquired about adding a large addendum to his existing service order. Our new fiscal year starts in two weeks. Can I get the paperwork under way, but request that he leave the date blank so that I can date it for the first of next month?

No. Inserting a date on a service order that mischaracterizes the transaction violates our responsibility to create and maintain accurate books and records. Service orders are important Company financial documents. Knowingly creating false or inaccurate financial documents will result in disciplinary action, up to and including termination.

Records Management

In the course of our daily operations, we generate large quantities of important Business Records (including emails, proposals, invoices, expense reports and contracts) that may be in an electronic or printed format and may be stored on our premises or offsite.

We make many critical business decisions based on information created by employees across the organization, so inaccurate or incomplete Information could have far-ranging negative consequences. Whenever creating, maintaining, approving or analyzing Business Records, we are each responsible for ensuring their accuracy and completeness.

We must maintain Business Records carefully and only dispose of them in accordance with our records management policies. Never tamper with records, destroy them without authorization or make changes to them in an attempt to conceal potential wrongdoing.

During litigation, threatened legal action and government investigations, we may be required to prevent the destruction or alteration of Information so that it may be produced for review. If such a “legal hold” is implemented, you will be notified by the Law Department. At that time, you will receive specific instructions to preserve and not delete or otherwise alter Information.



Take Note!

We all share responsibility for creating and maintaining accurate Business Records. *Business Record* means Information that is created, received and/or maintained by the Company as evidence of a legal obligation or business transaction that has operational, legal, or regulatory value.

Information includes any and all records or data in any format and/or media that is created or received by the Company.

References

Company Policy 3-02240, “Financial Reporting”

Company Policy 3-02290, “Internal Assurance Services”

Company Policy 3-10130, “Records Management”

Company Business Practice 4-11014, “Halliburton Internal Control Committee”

Company Business Practice 4-11059, “Travel and Entertainment Expense Reporting”

Company Business Practice 4-17013, “External Financial Reporting”

Company Business Practice 4-17015, “Financial Reporting and the Preparation of Consolidated Financial Statements”

Company Business Practice 4-17044, “Records and Information Management (RIM) – Lifecycle Management and Compliance”

Company Business Practice 4-17045, “Legal Holds on Records, Information, and Physical Materials”

Protection of Company Assets

Fraud, Waste or Misuse

We are all obligated to protect the Company's assets and to ensure their careful and legitimate use. Our assets include resources such as office supplies, equipment, communications systems and vehicles, as well as proprietary information, intellectual property, financial resources and information.

Theft, wasteful use of resources, and fraudulent activities are detrimental to our Company objectives and are prohibited. Examples of fraudulent activities include, but are not limited to:

- Embezzlement
- Dishonesty
- Kickbacks
- Forgery or alteration of negotiable instruments, such as checks and drafts
- Misappropriation of assets
- Theft of cash, securities, supplies, or any Company asset
- Unauthorized handling of Company transactions
- Falsification of Company records or financial statements for personal or other reasons

As a general rule, you should use the Company's physical assets, such as phones, computers or facilities, for business purposes only. On those occasions where you must use the Company's assets for personal use, use common sense and remember to always consider the best interests of the Company.

If you suspect that fraud, waste or misuse has occurred, you should report it to Global Ethics & Compliance, Internal Assurance Services, Corporate Security, the Chief Financial Officer, your manager, Human Resources or the Ethics Helpline.

Reference

Company Business Practice 4-17044, "Records and Information Management (RIM) – Lifecycle Management and Compliance"

Pradipa is preparing a proposal for a Company acquisition. The Microsoft Word document contains confidential and highly sensitive information about prospective acquisition targets. Pradipa needs to collaborate on this document via email with Vicky in another Halliburton department. Pradipa has worked with Vicky several times on other projects and knows her well. Should Pradipa trust Vicky to maintain the confidentiality of the information in the acquisition proposal?

As the "owner" of the document, Pradipa is responsible for accurately classifying the document as "Confidential" and taking steps to reduce the risk of intentional or accidental disclosure of this confidential document to unauthorized parties. Specifically, Pradipa should place a "Do Not Forward" restriction on the email that she uses to transmit the document to Vicky, greatly reducing the risk that the information will be shared electronically with unauthorized persons.

Proprietary Information and Intellectual Property

During the course of your work at Halliburton, you may come into contact with certain information (such as product plans and strategic documents) that is confidential and valuable to the Company. It is critical to treat all information carefully. Do not disclose confidential information about Halliburton or about our customers or business partners without approval and only on a "need to know" basis.

You must also protect the Company's intellectual property, which includes our patents, trademarks, trade secrets and copyrights. Safeguarding the Company's intellectual property is an important responsibility. Any unauthorized disclosure or misuse, either during or after your employment with Halliburton, could be harmful to Halliburton or to our customers, or helpful to competitors.

The unauthorized disclosure or use of proprietary information and/or the Company's intellectual property will lead to disciplinary action, up to and including termination of employment.

Halliburton may seek all legal remedies available to it to protect the unauthorized use of its proprietary information and intellectual property.

It is equally important to use the lawfully obtained intellectual property of others appropriately and in accordance with laws, applicable agreements and regulations. In addition, our customers, suppliers and joint venture partners entrust us with their confidential and proprietary information, and it is critical that we handle it with the greatest care to merit their continued confidence. You must not download code, documents, "freeware," or other material from the Internet and incorporate it into any Halliburton material without first checking with IT Security or the Intellectual Property Practice group in the Law Department.

To minimize the likelihood of an unintentional disclosure of sensitive information, make sure you take reasonable precautions during the course of your daily activities. For example, use strong passwords and do not write them down. Secure your computer and workstation, and never leave your laptop or mobile phone unattended, particularly when traveling.

If you have questions or concerns about the appropriate use of proprietary information or intellectual property, please discuss them with your supervisor, your LEO, Human Resources, Global Ethics & Compliance, or the Intellectual Property Practice group in the Law Department.

References

Company Policy 3-04050, "Payments for Personal Benefit – Incidental Personal Use of Company Assets"

Company Policy 3-04310, "Information Technology Security"

Company Business Practice 3-90060, "Anti-Fraud"

Company Business Practice 4-11154, "Use of Internet and Corporate Intranet Services"

Company Business Practice 4-31108, "Receipt and Use of Third-Party Products and Information"

Company Business Practice 4-44002, "Well Data Information Requests"

Company Business Practice 4-44160, "Personal Use of Company Vehicles"



Hashim plans to be away on vacation for a few days and needs to ensure that any items requiring his approval are handled appropriately in his absence. Should Hashim share his Halliburton login password with one of his subordinates and one of his peers, so they can log on with Hashim's credentials to SAP or other systems in his absence to approve any necessary items?

No. Hashim is responsible for maintaining the confidentiality of his password in compliance with the Company's Information Technology Security policy. If he shares his password with another person, there is increased risk that the password might be leaked to another, unauthorized person. Also, Halliburton requires that most system transactions (in SAP, for example) be accurately associated with the specific individual taking action. Therefore, Hashim should not share his password with anyone and must make arrangements to delegate his authority in some other manner so that someone else can act on his behalf during his vacation.

Sayed is an engineer in one of our technology centers. He has been working on a project to build a new inflow control device and is very excited about its potential. He has shared his design with his teammates. They think it could make a real difference in the field and have encouraged him to seek a patent. Sayed needs a prototype built quickly for testing, and has a friend, Bob, who works at a local machine shop. Sayed immediately sends his design to Bob to price out the prototype. Is this appropriate?

No. Sayed's actions present several problems. First, any patents for inventions or products created by employees during their employment at Halliburton are Company property, as are the inventions or products themselves. It is not appropriate for employees to seek patents on Halliburton's intellectual property. Additionally, Sayed has a responsibility to maintain the confidentiality of Halliburton's intellectual property, including the new design he has developed. Sending the design to an outside third party without proper vetting and approval violates Sayed's duty to maintain confidentiality and could result in his design falling into the wrong hands.

Privacy and Data Security

During the course of your employment at Halliburton, you may have access to confidential, personal or proprietary information that requires safeguarding. You must follow applicable privacy and data security laws and our own privacy and security policies when handling sensitive personal or proprietary information.

You should never share personal information without authorization, or use it for anything other than Halliburton-related business purposes.

Failure to maintain the confidentiality and security of personal data will lead to disciplinary action, up to and including termination of employment.

Protecting Personal Information

Halliburton is committed to maintaining the privacy and security of personal information. Halliburton will collect, transmit, disclose or use personal information only in compliance with local law and only for legitimate business purposes. The Company will only collect the amount of personal information that is needed and will not keep the personal information longer than necessary. Safeguarding personal information about individuals includes maintaining the confidentiality of names, ages, nationalities, bank account information and other personal data as defined in applicable laws.

Employees who have access to, or work with, personal information are responsible for handling information appropriately and taking all reasonable steps to preserve its confidentiality. We have adopted security procedures to protect personal data from unauthorized access and use.

Protecting the Confidential Information of Third Parties

The information that we collect and store about customers, vendors and other third parties is also confidential and sensitive in nature. This data must only be utilized for business purposes. We have adopted security procedures to protect stored proprietary data from unauthorized access and use.

References

Company Policy 3-15260, "Personal Data Protection"

Company Business Practice 4-31108, "Receipt and Use of Third-Party Products and Information"

Company Business Practice 4-44002, "Well Data Information Requests"

What is Personal Information?

Some common examples of confidential personal information include:

- Bank account numbers
- National Insurance numbers
- Social Security numbers
- Employment files
- Medical records
- Financial or expense records
- Trade union memberships

If your position at Halliburton gives you access to employees' personal information, always remember that it is confidential and must be protected at all times.

Stephanie, a Halliburton employee, was in a quarterly performance review with an operator discussing recent shale gas development work. During the quarterly review, safety and operational performance results were presented. New technology applications, advances, suggestions and value drivers were also to be presented. Gene, the vice president of drilling for an international oil company, stated openly, "We use these quarterly reviews to learn what else is going on in the field and surrounding areas, so please provide me with the results from your well construction performance using your new technology; everyone knows you're using it with operator XYZ." Stephanie has these results and examples that do illustrate Halliburton's performance on a thumb drive. Is it appropriate for her to share this information with the customer?

During sales and customer meetings, it is often important that we convey examples and statistics that accurately depict our successful performance to demonstrate why we are the best company for a particular project. However, we have an obligation to protect the confidential and proprietary information that we gather about other customers and partners. It is inappropriate to share such information with others, as our customers and partners expect that we will handle their confidential information with the utmost discretion and privacy. Before sharing the information on her thumb drive, Stephanie should ensure that all confidential data is removed so that no information that we are bound to protect is shared with other customers.



Take Note!

We are all responsible for safeguarding the confidential and proprietary information of our customers, employees, partners and vendors, as well as any personal information about individuals.

- You should only access confidential information if you have a legitimate business reason for doing so.
- You may provide confidential information to another Halliburton employee only if that employee has a need to know it in order to fulfill job responsibilities.
- If you are unsure about whether to disclose confidential information, contact your supervisor, Human Resources, Global Ethics & Compliance or the Intellectual Property practice group in the Law Department.

Relationship with Others

At Halliburton, we take pride in our reputation – not only our reputation for delivering the best solutions to our clients, but also our commitment to dealing fairly and lawfully with those clients and everyone with whom we work.

It is a reputation we are committed to keeping, which is why we place such a high value on ethical conduct.

This commitment is outlined in the “Relationship with Others” section of the COBC, which discusses the Company’s policies and guidelines related to:

- Anti-Bribery and Anti-Corruption
- Gifts, Entertainment and Other Hospitality
- Fair Competition
- International Trade
- Communications with the Public, Investors and the Media
- Civic and Charitable Activities
- Political Activities and Lobbying
- Conducting Business with the U.S. Government
- U.S. Federal Sentencing Guidelines

These policies serve as a guide. It is the responsibility of every employee to make a commitment to represent Halliburton in a fair and honest manner.

Given Halliburton's size and global reach, employees have the opportunity to work with a wide range of clients, vendors and even government officials around the world. We prohibit any interactions that could risk the Company's reputation, and we ask that employees, as representatives of the Company, commit to maintaining the highest levels of ethics and integrity.

Anti-Bribery and Anti-Corruption

Prohibition of Bribery

Bribes are illegal in virtually every country and are prohibited by the COBC. Because Halliburton conducts business around the world, we are subject to numerous laws that prohibit receiving, offering, providing or authorizing the payment of bribes of any kind to anyone. These include the U.S. Foreign Corrupt Practices Act (FCPA) and the U.K. Bribery Act 2010 (U.K. Bribery Act), which apply to our operations around the world.

Failure to comply with any anti-bribery laws will result in disciplinary action, up to and including termination of employment.


At Halliburton, we do not bribe or use any other means to improperly influence the decisions of others, including customers, potential customers or government officials. No Halliburton employee may authorize, provide or offer anything of value directly, indirectly or through a third party, to any individual for the purpose of obtaining or retaining business, gaining influence, or seeking any other advantage for the Company.

Employees are also prohibited from accepting bribes or requesting anything of value from suppliers or other third parties.

No employee will ever be disciplined for refusing to pay a bribe, regardless of its impact on sales, profitability, project completion or other aspects of our business. The ultimate cost and long-term detrimental effects of bribery and corruption far outweigh any short-term benefits.

In addition to disciplinary action, violations of anti-bribery laws, including both the FCPA and the U.K. Bribery Act, may result in criminal and civil penalties for both the Company and individual employees. These penalties can include significant fines and jail terms for those involved.

Halliburton is committed to conducting business the REDWay – responsibly, ethically and diligently. Acts of bribery will not be tolerated.



Take Note!

A “government official” means an individual who is an employee of a government, including any officer or employee of a government unit or national oil company.

Government officials also include candidates for political office, political party officials, members of royal families and even employees of government-owned businesses (such as national oil companies).

Also included are officials and employees of public international organizations, such as the World Bank.

In addition, gifts or bribes to a family member of a government official can be considered to be bribes to non-U.S. Government Officials.



Take Note!

Bribes can take many forms other than cash payments. Any of the following could constitute bribes under certain circumstances:

- Trips or entertainment, if they are lavish, frequent or regular
- Kickbacks (payment of part of the money received from a contract to the individual who awarded the contract work)
- Gifts, if they are lavish, frequent or regular
- Charitable donations
- Offers of employment
- Loans

There is no minimum financial value on what can constitute a bribe. In general, gifts, entertainment and other hospitality may not be offered or provided to government officials without the prior approval of Global Ethics & Compliance. If you have any questions, consult with your supervisor or Global Ethics & Compliance before offering anything of value to a government official.

Facilitating Payments

Facilitating payments are small payments given to government officials to expedite or secure the performance of a routine governmental action. Making, offering, or promising a facilitating payment directly or through a third party is prohibited.

References

Company Policy 3-02570, "Anti-Corruption"

Company Policy 3-15400, "Prohibition of Facilitating Payments"

International Business Relationships

Halliburton frequently enters into business relationships with individuals and companies outside the U.S. The risk to the Company from each type of International Business Relationship is different and, therefore, the appropriate amount of due diligence and the necessary prior management approvals required are different for each type of relationship. Global Ethics & Compliance makes the final determination on the true nature of the proposed relationship and which policies apply.

Anti-bribery laws prohibit companies from making corrupt payments. When a payment is made by a third party on behalf of a company, it is treated as if the company made the payment itself. Companies can be held responsible not only when they knew that such activity was occurring, but also under circumstances when they should have known that such payments would be made.

No payment of anything of value may be made by a third party acting for or on the Company's behalf for the purpose of obtaining or retaining business or for gaining any business advantage.

If a government official recommends or suggests an agent, vendor, subcontractor or joint venture partner, due diligence must be performed before that individual or entity can be retained. Do not seek such recommendations from any government officials.

Employees who work with International Business Relationships are responsible for ensuring that our business partners act legally and ethically on behalf of Halliburton at all times. If you suspect that a third party is violating anti-bribery laws or engaging in any other illegal conduct, contact your LEO, Global Ethics & Compliance or the Ethics Helpline immediately.

Money Laundering

Money laundering is the process by which illegally obtained funds are transferred through the financial system in an attempt to conceal their criminal origin. We are committed to complying with all applicable anti-money-laundering laws, rules and regulations.

We must only conduct business with reputable third parties who engage in legitimate business activities. You must avoid any transactions that are structured in a way that could be viewed as concealing illegal conduct or illegally obtained funds. If you suspect that a third party may be concealing illegal conduct, contact your LEO, Global Ethics & Compliance or the Ethics Helpline immediately.

What is an International Business Relationship?

IBRs are commercial relationships where a third party engages in any of the following activities outside of the U.S. or before a Non-U.S. Government Official or National Oil Company (NOC) anywhere in the world: 1) assists in the pursuit of commercial opportunities through customer-facing, sales-related business development activities; 2) collaborates with the Company to jointly pursue or market for commercial opportunities; 3) buys products, equipment, materials, or software from the Company for resale or, in the case of software, for relicense to an end user; or 4) represents the Company before Non-U.S. Government Officials or NOCs for its benefit or to support the Company's day-to-day operations.

References

Company Policy 3-02570, "Anti-Corruption"

Company Policy 3-02580, "Local Content - Africa"

Company Policy 3-15400, "Prohibition of Facilitating Payments"

Company Policy 3-15700, "International Non-Commercial Agents (INCAs)"

Company Policy 3-15800, "Collaborative Pursuit Relationships"

Company Policy 3-31111, "International Business Relationships"

Company Policy 3-31112, "International Commercial Agents"

Company Policy 3-31113, "International Distributors, Consignment Stock Agents, and Software Resellers"

Gifts, Entertainment and Other Hospitality

While reasonable gifts, entertainment and other hospitality can be appropriate during the normal course of business, they must never compromise the integrity of our business relationships. The giving or receiving of any gifts, entertainment, hospitality or other benefit that creates a feeling of obligation on the part of the recipient is prohibited under the COBC and is illegal under the laws of most countries, including the U.S.

In general, gifts, entertainment and other hospitality should not:

- Be offered or provided to non-U.S. Government Officials without prior approval by Global Ethics & Compliance
- Be solicited
- Be offered or accepted during any bidding process
- Be in the form of securities, cash, cash equivalents (including gift certificates, vouchers, stocks and savings bonds), precious metals or items that can be readily converted to cash
- Be offered to or accepted by the same recipient with unreasonable frequency
- Be inconsistent with accepted and customary business practices
- Be offered to influence or reward a particular business decision or action
- Violate applicable law or policies
- Be of a nature that would embarrass the Company if publicly disclosed

What is Business Hospitality?

The term Business Hospitality means anything of value provided to Non-U.S. Government Officials, including National Oil Company (NOC) employees, and their families for a legitimate business purpose, such as gifts, travel, local transportation, lodging, external training, entertainment, business meals, and sponsorships.

May I accept a gift certificate from one of our suppliers?

No. Halliburton's gift policy prohibits employees from accepting any gifts of cash or cash equivalents regardless of value. Additionally, Halliburton prohibits employees from accepting any gifts, entertainment, dining or other benefit that might create a feeling of obligation or that might otherwise compromise the employee's professional judgment. Nominal gifts or entertainment during the normal course of business are generally acceptable.

Giving Gifts, Entertainment or Other Hospitality to Non-U.S. Government Officials

Business Hospitality, such as gifts, travel, local transportation, lodging, external training, entertainment, business meals, and sponsorships, that are offered, promised, or provided must be directly related to a legitimate business purpose and not be excessive in value or amount. Business Hospitality may be appropriate, pursuant to local custom and applicable law, for purposes of fulfilling specific contractual requirements; building business relationships; or promoting, demonstrating, or explaining Company products or services. Making, offering, or promising Business Hospitality with the intent to improperly influence a decision is prohibited.

Most Business Hospitality, regardless of dollar value, requires approval from Global Ethics & Compliance.

Gifts of cash, gift cards, or other monetary gifts of any kind are expressly prohibited.

Receiving Gifts, Entertainment or Other Hospitality from Clients and Vendors

Halliburton discourages employees from accepting gifts, entertainment or other hospitality from clients and vendors, as doing so may unintentionally influence your business decisions. However, we recognize that, in certain circumstances, exchanging gifts, entertainment or other hospitality with clients and vendors is an acceptable business practice. As such, you may give or receive appropriate business gifts, entertainment or other hospitality, provided that all such gifts or entertainment are nominal in value. Remember, for government officials, including officers and employees of national oil companies, prior approval by Global Ethics & Compliance is required.

Employees must never solicit gifts, entertainment or other hospitality from clients and vendors, particularly in return for business or other favorable treatment. Any gift that creates a feeling of obligation in the recipient is not of nominal value and should not be accepted.

Gifts of cash, gift cards or other monetary gifts of any kind regardless of dollar value are expressly prohibited.

You should not receive any gifts or entertainment from vendors if you are a member of the team evaluating open tenders for which the vendor is competing.

Maggie, a Halliburton employee in a Middle Eastern country, is responding to a tender for a significant and high-profile project for the government of that country. One of the tender's requirements is that Halliburton must make a sizable contribution to the country's Education Ministry, which will use the funds to improve education facilities and opportunities for young girls. What should Maggie do? Is it permissible to make such a contribution in order to help secure a large project?

Halliburton believes in supporting educational institutions and charities outside of the U.S. and has implemented policies that formalize the process for making education-related contributions. The facts surrounding this scenario present a number of red flags, however, so Maggie must proceed with caution. Primarily because the contribution request involves a government ministry, it must be carefully scrutinized to prevent a possible violation of anti-bribery or anti-corruption laws.

Before making or authorizing any charitable contribution, particularly one that is required in a project tender, Maggie should consult with Global Ethics & Compliance.

Several employees of Petroland Oil Company (a national oil company) approached a local Halliburton Business Development team to jointly form golf teams to participate in a local golf tournament. They suggested that Halliburton sponsor two teams, each consisting of two players from Petroland Oil Company and two players from Halliburton. Can the Halliburton employees play in the tournament?

Maybe. However, before agreeing to play in the golf tournament, the employees must contact Global Ethics & Compliance to seek approval. This is a sensitive situation because, as national oil company employees, the Petroland employees may be considered government officials under some anti-bribery laws. Paying for them to participate in a golf tournament could be considered bribery under certain circumstances; therefore, the situation needs to be carefully evaluated before proceeding.

Remember that Business Hospitality involving non-U.S. Government Officials requires Global Ethics & Compliance approval.

References

Company Policy 3-02570, "Anti-Corruption"

Company Policy 3-15540, "Gifts and Entertainment Provided by Suppliers and Supplier Sponsorship of Company Events"

Company Business Practice 4-10986, "Company Contributions to Meet Social Commitments"

Company Business Practice 4-11056, "Business Hospitality for Non-U.S. Government Officials and their Families"

Company Business Practice 4-11059, "Travel and Entertainment Expense Reporting"

Company Business Practice 4-11156, "Procurement Processes Manual"



Fair Competition

Competition Laws and Anti-Competitive Activities

We are committed to competing fairly and winning business ethically and legally by delivering superior products and services. Our marketing, advertising and sales efforts must be honest and forthright, and we will refrain from making unfair or disparaging comments about our competitors and their offerings.

Halliburton's business pursuits are regulated by various global competition laws (also called “anti-trust laws” in the U.S.) that promote fair competition by prohibiting practices or activities that unfairly restrict trade. These laws can be complex, and violations can lead to significant civil penalties as well as fines and jail sentences. We must never engage in the anti-competitive behavior that competition laws prohibit, including formal or informal agreements to:

- Fix or coordinate prices
- Facilitate collusive bidding or bid rigging
- Boycott certain customers or suppliers
- Share information with competitors about prices, profits or profit margins
- Divide or allocate markets, territories or customers
- Exchange or share any unpublished information concerning prices or any other competitive information with a competitor
- Strike reciprocal deals with partners or suppliers.

It is important to avoid creating even the perception that we are colluding with our competitors. As such, limit your interactions with competitors to the extent possible and avoid discussions about any of the topics listed above. If a competitor engages you in a conversation that concerns you, end the discussion immediately and contact Global Ethics & Compliance immediately.

Can I have a drink with a competitor at a trade show and discuss the possibility of Halliburton partnering with his company to bid jointly on a contract tender? Working together would increase the likelihood of us winning the deal.

Be extremely cautious in any conversations with competitors. You may be violating competition laws if you share information on competitively sensitive topics, including prices, costs, fees, profit margins, or credit and billing practices.

While competitors can work together as partners in certain instances, competition laws prohibit agreements between competitors to fix prices or to allocate customers, territories, products or services. Such agreements are illegal. You should avoid all conversations with competitors about business-related topics. Consult Global Ethics & Compliance before you make any plans to talk with a competitor.

Gathering Competitive Information

Understanding the competitive landscape is vitally important for our continued success. Within certain guidelines, it is appropriate for us to gather information about our competitors' products, services and market activity. We may review publicly available information to learn about competitors, but we must refrain from collecting intelligence using illegal, deceptive or improper means.

When gathering information, we must always respect competitors' intellectual property and never use inappropriate means to obtain their confidential information. This includes, but is not limited to:

- Emails intended for others
- Proposals
- Price sheets
- Engineering drawings and specifications
- Business plans
- Process documents
- Communications

Never seek confidential information from a competitor's employees or customers, or use confidential or proprietary information that you obtained on a previous job. If you come across material that you reasonably believe to be confidential, stop reading it immediately and contact Global Ethics & Compliance.

If you have any questions about whether certain competitive activities comply with the COBC, you should immediately consult with Global Ethics & Compliance.



International Trade

As a company operating globally, we frequently move products, supplies, equipment and software between countries. We must comply with the laws of those countries with respect to the import and export of those items. This includes when our products and services are transshipped through a country.

Export and Compliance

We will comply with the laws of each country from which we export our goods, software and technical data. No business will be transacted and no item will be exported that is not in compliance with the following:

- The United States Export Administration Act (EAA)
- The Arms Export Control Act (AECA)
- Regulations to implement international economic sanctions programs involving particular countries, including regulations promulgated by the Office of Foreign Assets Control of the United States Department of the Treasury
- The Export Administration Regulations (EAR)
- The International Traffic in Arms Regulations (ITAR)
- The export laws and regulations of any other country that apply to a particular shipment
- The terms and conditions of any export license issued to Halliburton or any of its subsidiaries

There are no exceptions to this policy. We have a system of internal controls, many of which are automated in SAP that protect Halliburton against violations of import and export laws. All employees must comply with these internal control systems.



Take Note!

While we typically think of exports as being items that are shipped from one country to another, the term is much broader, and includes goods, services, technology, software and data, and other items – even information that is flown, uploaded, downloaded, emailed or faxed.

Export rules become more complicated when it comes to intangible exports. While goods must be physically shipped to another country to be considered exports, technology and software can be “exported” by giving a foreign national access to them, or by posting the information on a website that may be viewed in other countries.

Customs and Import Compliance

We will comply with the local import and customs laws of any country into which we import goods, software or technical data, and will use our best efforts to provide correct information about (a) the origin of the goods, software or technical data; (b) their classification under the harmonized tariff or similar system; and (c) their value for customs purposes.

Boycotts

As a U.S. company, we are subject to U.S. law, which prohibits cooperation with boycotts imposed by the laws of other countries, but in which the U.S. is not participating. U.S. law also prohibits providing information for a boycott-related purpose concerning the identity and nationality of our employees, directors, shareholders, subcontractors and suppliers – or information about whether or not the Company has business dealings in certain countries subject to a boycott.

We are required by law to report requests we receive to support prohibited boycotts, even though we do not comply with those requests. Sometimes requests to support a prohibited boycott are hard to detect. All employees and agents who are likely to come in contact with such requests must be fully aware of these restrictions and make all required reports in a timely manner. Any employee who receives such a request or has a question about whether or not a particular item is a prohibited or reportable boycott request should contact Global Ethics & Compliance.

Reference

Company Policy 3-10992, "International Trade Compliance and Shipping Arrangements"



Communications with the Public, Investors and the Media

Communications with Investors

We are committed to complying with applicable regulations regarding the selective disclosure of material nonpublic information. The Company has authorized only a small group of individuals to communicate information about Halliburton to the investment community. Any requests for information from investors, analysts or similar persons should immediately be directed to Investor Relations.

Communications with the Public and the Media

Our communications with the public must be honest and straightforward. To ensure that our communications are always accurate and consistent, a limited number of individuals within Halliburton are responsible for communicating on our behalf. Only those individuals with authority to speak publicly on the Company's behalf may do so. If you do not have this authority and are approached by members of the public or the media, please refer them to your supervisor or to Global Communications & Marketing immediately.

Personal Use of Social Media

Always exercise careful judgment when posting comments on social media, particularly those about our commercial business, customers or business partners. Remember that your communications over social media can have significant public implications for Halliburton. Make it clear that you are expressing your own opinions and are not communicating on behalf of the Company. Your comments should not include profane, demeaning or embarrassing content.

If you use the Company's systems for limited personal use, avoid visiting inappropriate websites. Keep in mind that Halliburton has the right to monitor communications that take place over our information systems to the extent permitted by law. If you have any questions about whether a particular use of the Company's systems is appropriate, ask your supervisor.

If you plan to use social media for business-related purposes, you must first obtain authorization from your supervisor.

Am I allowed to access the Internet for personal use while I am at work?

Your computer is a tool provided by Halliburton for you to do work on the Company's behalf. Likewise, the electronic network by which you send and receive emails and access the Internet is a corporate asset meant to be used in conducting the Company's business.

Though occasional and reasonable personal use of email and the Internet is permitted, you must exercise good judgment in not abusing the privilege. You should use the Internet responsibly at all times regardless of whether your activities are personal or business use. You must avoid excessive personal use of the Internet while at work. Additionally, accessing inappropriate content on the Internet using the Company's computers is prohibited.

References

Company Policy 3-10020, "Media Relations and Press Releases"

Company Policy 3-90110, "Halliburton Electronic Messaging System (HEMS)"

Company Business Practice 4-11154, "Use of Internet and Corporate Intranet Services"

Company Business Practice 4-11255, "Social Media and Personal Online Publishing"

Company Business Practice 4-16466, "Smartphone and Other Handheld Wireless Devices: Requests, Approvals, and Use"

Civic and Charitable Activities

We are proud to support corporate participation in civic and charitable activities, and encourage charitable participation of all individuals who work on our Company’s behalf. However, you should never use your position at Halliburton to suggest or imply Halliburton's sponsorship or endorsement of an outside event or charity.

It is important to ensure that your personal, charitable activities do not interfere with your work responsibilities at Halliburton. Contact your supervisor, Global Communications & Marketing or Global Ethics & Compliance if you wish to use Halliburton's time or resources to support charitable or nonprofit causes.

References

<i>Company Policy 3-15570, “Approval Criteria for Charitable Contributions”</i>	<i>Company Business Practice 4-10980, “Obtaining Approval for a Charitable Contribution and Accounting for the Donation”</i>
<i>Company Policy 3-76700, “Plan for Aid to Education and Selected Charities”</i>	<i>Company Business Practice 4-10981, “Employee Fundraising Activities on Company Property”</i>

Political Activities and Lobbying

Corporate Political Activities

Halliburton may engage in public policy issues relevant to the Company's interests. Halliburton's corporate political activities, including any contributions of Halliburton funds or use of Company facilities and resources, must comply with applicable laws. There are also times when Halliburton may provide administrative support for the operation of political action committees or provide support in informing the public on an issue of importance to the Company and its shareholders. In these cases, contributions will always be in compliance with federal, state and local laws.

Personal Political Activities

Participation in the political processes is a large part of our commitment to corporate citizenship. While you are encouraged to participate personally in the political process, you should do so on your own time and with your own resources.

We encourage employee participation in this process, so long as it is consistent with the laws and regulations that govern political activities.

Activities encouraging participation in Halliburton's political action committee should be approved by the General Counsel.

Soliciting support of a political cause or candidate in the workplace is prohibited. You should not use your position at Halliburton to suggest or imply Halliburton's sponsorship or endorsement of a candidate or endorsement of a political position, without first obtaining approval from the Government Affairs department.

Lobbying

We abide by all lobbying laws and may engage employees or professional lobbyists to work with government officials on our behalf. Halliburton prohibits participation in any lobbying activities

on the Company’s behalf without specific authorization from the General Counsel. Any authorized lobbying must be recorded and reported in accordance with federal regulations.

Reference: *Halliburton Government Affairs*

Conducting Business with the U.S. Government

Halliburton does not generally work as a contractor providing goods and/or services to the U.S. government, agencies thereof or for parties using federal funds. U.S. federal law has strict rules and regulations that apply to companies attempting to qualify for, bid for, or perform U.S. Government-funded work. These regulations and requirements differ from our normal business operations and impose certain obligations on the Company. Violations of these rules and regulations can impose heavy penalties and sanctions on Halliburton. Accordingly, no bid should be made by any Halliburton entity for

any U.S. Government-funded work unless and until the bid request has been reviewed and approved by the Law Department.

Halliburton complies with applicable U.S. federal statutes and regulations governing the employment of former U.S. military, Department of Defense, or other federal employees. Supervisors contemplating hiring a former U.S. governmental employee, or engaging the employee as a consultant, should consult with the Law Department for guidance before hiring the individual.

U.S. Federal Sentencing Guidelines

Halliburton's COBC represents an effective compliance program as required under the Federal Sentencing Guidelines, which are a product of the United States Sentencing Commission, created by the Sentencing Reform Act of 1984. The COBC is designed to detect an offense before discovery outside of Halliburton, or before the discovery is reasonably likely, and to provide reasonable assurances that no individual with operational responsibility for the Company's compliance program will participate in, condone or willfully ignore criminal conduct in the Company.

Halliburton has taken reasonable steps to remedy the harm that may result from any criminal conduct, including, as appropriate, paying restitution, self-reporting the conduct to government authorities and cooperating with those authorities in any ensuing investigation.

If it is determined that criminal conduct has occurred, Halliburton will assess its compliance program and make appropriate modifications to prevent such conduct from recurring, including consultation with outside professional advisors as to what modifications should be made and how to comply with such modifications.

Our CECO has a direct reporting relationship to the Halliburton Board of Directors, as well as to the Executive Vice President and General Counsel. At the direction of the Board, the CECO has express authority to communicate personally with the Audit, Compensation, and Nominating and Corporate Governance committees promptly on any matter involving criminal conduct, or potential criminal conduct, and no less than annually on the implementation and effectiveness of Halliburton's compliance program.

Conclusion

We are all responsible for making sound decisions that comply with both the letter and spirit of the laws that govern our actions. We must work together to create a healthy and respectful working environment and continue to build a company the REDWay – responsibly, ethically and diligently. As you go about your daily activities, please remember to:

- Abide by the principles in the COBC
- Use common sense in your work and decisions
- Refer to available Company resources for guidance when you have questions
- Hold colleagues and partners to high ethical standards
- Do not sacrifice your personal integrity for profits or personal gain
- Report suspected illegal actions and COBC violations promptly

We will update the COBC periodically to reflect relevant changes in the law and/or changes to our policies. We always welcome suggestions for improving the legal and ethical culture at Halliburton or for making the COBC more useful to you. Please contact Global Ethics & Compliance with comments or ideas anytime.

The COBC does not provide any rights, contractual or otherwise, to any third parties or to any personnel of the Company or its subsidiaries.

The COBC was last amended and those amendments adopted by the Halliburton Board on May 18, 2020.

Reference

Company Policy 3-02120, "Administration of the Code of Business Conduct"

Compliance and Ethics Resources at Halliburton

Reporting Violations

You can direct questions about possible violations of the law or the COBC to your supervisor, your LEO, Human Resources, Global Ethics & Compliance or the Halliburton Ethics Helpline. The Ethics Helpline is available 24 hours a day, 7 days a week, and is operated by an independent company. Translators are available. You may remain anonymous when making a report.

Halliburton prohibits retaliation against individuals who report misconduct in good faith.

- In the U.S. and Canada, call: 1-888-414-8112
- In Argentina, call: 0800-444-2801
- In Brazil, call: 0800-891-4378
- In Colombia, call: 01-800-912-0532
- In Indonesia, call: 001-803-1-009-1244
- In Malaysia, call: 1-800-81-3431
- In Norway, call: 800-14156
- In Saudi Arabia, call: 800-850-0623
- In the U.K., call: 0800-169-3116
- All other countries, call 1-770-613-6714 (Note: This is a U.S. telephone number.)

You can also send an email to FHOUCODE@halliburton.com or a letter to: Code of Business Conduct, Box 2625, Houston, Texas 77252-2625.

Additional Resources (Located on HalWorld)

- Global Ethics & Compliance groups
 - Code of Business Conduct
 - Regional Compliance Counsels
 - Due Diligence
 - International Trade Compliance
 - Records and Information Management
- Intellectual Property Practice group
- Public Law Practice group
- Global HSE Hotline – Call 1-281-575-4413 (Note: This is a U.S. telephone number) or email GlobalHSE@halliburton.com
- Corporate Security – Call 1-713-839-4700 (Note: This is a U.S. telephone number) or email FHOUHCS – Corporate Security
- Human Resources
- Your LEO

Waivers

Any waiver of the requirements of the Code of Business Conduct for Directors or Executive Officers of the Company may be made only by the Audit Committee of the Halliburton Board of Directors. The Company will promptly disclose such waivers to its shareholders as may be required by law.



