

Olivier Le Peuch
Chief Executive Officer
SLB
3600 Briarpark Drive
Houston, Texas, 77042
United States



January 29, 2025

Dear Mr. Le Peuch,

We are writing to follow up on our previous correspondence with Schlumberger/SLB dated November 1, 2022, April 27, 2023, and September 26, 2023, regarding potential inconsistencies between SLB's obligations, as articulated in the United Nations Guiding Principles on Business and Human Rights (UNGPs), and the company's ongoing business operations and relationships in Russia that may contribute to, or be linked with, human rights harms.¹ To date, we have not received a response to our letters.

As you are aware, SLB is one of the few U.S.-based oil services companies that continues to operate in Russia following the country's full-scale invasion of Ukraine in February 2022. While your competitors, such as Baker Hughes and Halliburton, exited the Russian market in 2022, SLB has reportedly signed new contracts, advertised for over 1,000 jobs, and imported equipment into Russia despite the geopolitical context and international sanctions.²

On January 10, 2025, the U.S. Treasury Department imposed a new set of sanctions on Russia's oil sector, including measures affecting U.S. service providers like SLB. According to the new sanctions, U.S. companies are prohibited from providing services related to the extraction and production of crude oil and other petroleum products in Russia, effective by February 27, 2025. As U.S. Representative Lloyd Doggett recently pointed out, "Any reasonable interpretation of Treasury's new guidance that 'cuts off access to U.S. services related to the extraction of crude oil' would mean getting U.S. oilfield services companies out of Russia."³

In response to these sanctions, SLB has stated that it is reviewing the new measures and believes that its voluntary actions, such as halting shipments of products and technology into Russia from all SLB facilities worldwide, align with the new restrictions. CEO Olivier Le Peuch mentioned in an earnings call that SLB is committed to compliance with the regulations and is taking appropriate steps. SLB claims compliance with all sanctions.⁴ However, there remains significant concern about the ongoing scale of your operations in Russia, and whether they are indeed fully aligned with U.S. sanctions and international expectations.

¹ B4Ukraine, "Business Outreach – SLB," <https://b4ukraine.org/pdf/SLB.pdf> (accessed January 29, 2025).

² Jamie Smyth, "Oilfield services group SLB resists rising pressure to exit Russia," *Financial Times*, January 17, 2025, <https://www.ft.com/content/476aebd8-d438-45a4-ac88-2217ff93c9ff> (accessed January 29, 2025).

³ Arathy Somasekhar and Timothy Gardner, "SLB says its Russia business aligns with new US sanctions as revenue drops," Reuters, January 17, 2025, <https://www.reuters.com/business/energy/slb-says-its-russia-business-aligns-with-new-us-sanctions-revenue-drops-2025-01-17/> (accessed January 29, 2025).

⁴ SLB, "FAQs for SLB in Russia," January 21, 2025, <https://www.slb.com/resource-library/updates/2024/faqs-for-slb-in-russia> (accessed January 29, 2025).

As confirmed by legal experts, the new sanctions make it clear that the provision of oilfield services in Russia is now "prohibited and sanctionable under U.S. law." Jeremy Paner, a partner at Hughes Hubbard & Reed, further emphasized that "the U.S. sanctions risk exposure arising from SLB Russia's operations could not be higher at this point."⁵ Therefore, the company faces not only legal risks but also growing pressure from within the US and the international community.

Craig Kennedy, a Russia analyst at Harvard's Davis Center, has highlighted that if SLB were to exit Russia, it would significantly impact the Kremlin's oil sector by increasing costs and limiting production capabilities.⁶ If SLB ceases its operations in Russia, it would restrict access to critical technologies and resources essential for oil production, drive up exploration and extraction costs, and ultimately curtail revenues that fund Russia's military budget. Consequently, this would support Ukraine in its fight for sovereignty against Russia's aggressive war.

We are writing again to inquire on the following:

1. **Does SLB plan to comply fully with the new U.S. sanctions, which prohibit the provision of oilfield services related to the extraction of crude oil in Russia?**
2. **Does SLB have a detailed plan for winding down its operations in Russia by the February 27, 2025 deadline? If yes, is the company willing to share any details of the plan?**
3. **Can SLB confirm that it will suspend its contracts, halt job advertisements, and cease importing equipment into Russia, in light of the recent sanctions and their implications?**
4. **How will SLB ensure its ongoing compliance with U.S. and international sanctions, and address any legal risks associated with its operations in Russia?**
5. **What steps is SLB taking to ensure that its operations do not contribute to or be linked with human rights violations, particularly given the critical role that oil revenues play in financing Russia's military activities?**

We hope that SLB will take immediate action to align its operations with international humanitarian and human rights law as well as the established business and human rights framework, and join the global efforts to curb Russia's ability to fund its military aggression against Ukraine.

Given the urgent nature of these developments, we respectfully request that SLB provide a response to these questions and clarify the company's position regarding compliance with the new U.S. sanctions and its ongoing operations in Russia. In consideration of the above points, as well as the questions raised in our previous letters, we are open to a dialogue with SLB's relevant senior management to discuss the company's ongoing activities and relationships in Russia, along with the associated risks to the people of Ukraine. Please contact B4Ukraine at contact@b4ukraine.org to schedule a call by 5:00pm CET, February 12, 2025.

Please note that this letter, along with any response—or lack thereof—will be published on B4Ukraine's web pages after the indicated date. If SLB is prepared to meet with representatives of the B4Ukraine Coalition, such a meeting would be held under Chatham House rules.

Sincerely,

The B4Ukraine Coalition

⁵ Jamie Smyth, "Financial Times: Pressure mounts on US oil services group SLB to exit Russia operations," January 14, 2025, https://doggett.house.gov/media/in-the-news/financial-times-pressure-mounts-us-oil-services-group-slb-exit-russia-operations?utm_source=chatgpt.com (accessed January 29, 2025).

⁶ Ibid.

Olivier Le Peuch
Chief Executive Officer
SLB
3600 Briarpark Drive
Houston, Texas, 77042
United States

September 26, 2023

Dear Mr. Le Peuch,

We write to follow up on our previous correspondence with Schlumberger/SLB dated November 1, 2022, the corresponding follow-up dated November 16, 2022, and a letter with additional enquiries sent on April 27, 2023, regarding potential inconsistencies between SLB's obligations, as articulated in the UNGPs, and the company's ongoing business operations and relationships in Russia that may contribute to, or be linked with, human rights harms. We have not received a response to our letters.

In the year following the illegal invasion of Ukraine, Russia imported over 5,500 items valued at more than \$200 million from the top five U.S. firms, including SLB, Baker Hughes, and Halliburton. This helped sustain a crucial aspect of the Russian economy, even as Western nations implemented sanctions aimed at weakening Russia's war effort. While Baker Hughes and Halliburton gradually scaled down their Russian operations, SLB not only maintained its business in Russia but even experienced slight growth after other companies had withdrawn. Until recently, SLB continued to sell technology in the country.¹

On July 14, 2023, SLB announced that "it is halting shipments of products and technology into Russia from all SLB facilities worldwide in response to the continued expansion of international sanctions. This follows SLB's previous ban on shipments from the United States, United Kingdom, the European Union and Canada into Russia."²

We are writing to enquire on the scope of SLB's commitment as indicated in its July statement. Does this commitment mean that SLB Russia and SLB's other brands and subsidiaries in Russia are prohibited from purchasing products and technology from third countries, such as China? What restrictions does this commitment place on SLB's ability to use and sell products and technology, once imported, within Russia and to, or for the benefit of, Russian companies?

We are reaching out to SLB again, to formally notify the company of the potential legal accountability it may face in the future, due to its continued actions in Russia. Companies remaining in Russia are open to significant legal risks, including potential civil and criminal liability under comprehensive sanctions regimes and recent international jurisprudence holding corporations and their officers

¹ Ed Davey, "Top US firms supplied equipment to keep Russian oil flowing after Ukraine invasion," AP, July 18, 2023, <https://apnews.com/article/russia-ukraine-oil-slb-baker-hughes-halliburton-6f596774f713dd44d5bd6b7e5011d48a> (accessed September 25, 2023).

² SLB, "Update on SLB's Russia Operations," July 14, 2023, <https://www.slb.com/resource-library/updates/2023/update-on-slbs-russia-operations> (accessed September 25, 2023).

responsible for human rights abuses abroad.³ By remaining in Russia, companies may not only be exposed to these risks but may also become directly complicit in war crimes.⁴

In consideration of the above points as well as questions raised in our previous letters, we request an urgent dialogue with SLB's relevant senior management and staff to discuss the company's ongoing activities and relationships in Russia and associated risks to the people of Ukraine.

Please keep in mind that this letter and any response or lack thereof will be published on B4Ukraine web pages after the indicated date below. If SLB is prepared to meet with the B4Ukraine Coalition representatives, any such meeting would be held under Chatham House rules.

Please contact B4Ukraine at contact@b4ukraine.org to schedule a call by 5:00pm CET, October 3rd, 2023.

Sincerely,

The B4Ukraine Coalition

³ International companies remaining in Russia are now at a greater risk of violating sanctions regimes as implementation of the legislation will likely involve transacting with sanctioned individuals or entities. Furthermore, new domestic civil and criminal cases against companies involved in violations of international law demonstrate the risk of significant liability for facilitating state-sponsored human rights abuses abroad (e.g., Lafarge case, Lundin case, Castel Group indictment, Nevsun holding, and Dassault Aviation, Thales, and MBDA France criminal complaint.) [Victoria Riello](#) and [Larissa Furtwengler](#), "Corporate Criminal Liability for International Crimes: France and Sweden Are Poised To Take Historic Steps Forward," *Just Security*, September 6, 2021, <https://www.justsecurity.org/78097/corporate-criminal-liability-for-human-rights-violations-france-and-sweden-are-poised-to-take-historic-steps-forward/> (accessed November 14, 2022); The Sentry, "Breaking: France Opens War Crimes Inquiry Focused on Iconic Food and Beverage Conglomerate," July 1, 2022, <https://thesentry.org/2022/07/01/7216/breaking-france-opens-war-crimes-inquiry-focused-iconic-food-beverage-conglomerate/> (accessed November 14, 2022); *Rfi*, "French technology firm charged over Libya cyber-spying," July 2, 2022, <https://www.rfi.fr/en/business-and-tech/20210701-french-tech-firm-charged-over-libya-cyber-spying> (accessed November 14, 2022); Preston Lim, "Canadian Supreme Court Allows Corporate Liability for International Law Violations," *Lawfare*, March 12, 2022, <https://www.lawfareblog.com/canadian-supreme-court-allows-corporate-liability-international-law-violations> (accessed November 14, 2022); Sherpa, "Aiding and abetting war crimes in Yemen: Criminal complaint submitted against French arms companies," June 2, 2022, <https://www.asso-sherpa.org/aiding-and-abetting-war-crimes-in-yemen-criminal-complaint-submitted-against-french-arms-companies> (accessed January 2, 2023).

⁴ Nataliya Popovych and Bennett Freeman, "Russia's Putin is forcing foreign-owned companies to participate in his conscription campaign. It's time to get out," *Fortune*, October 13, 2022, <https://fortune.com/2022/10/13/russia-putin-foreign-owned-companies-conscription-campaign-sanctions-ukraine-war-international-europe-popovych-freeman/> (accessed November 14, 2022).

Olivier Le Peuch
Chief Executive Officer
SLB
3600 Briarpark Drive
Houston, Texas, 77042
United States

April 27, 2023

Dear Mr. Le Peuch,

We write to follow up on our previous correspondence with Schlumberger dated November 1, 2022, and the corresponding follow-up dated November 16, 2022, regarding potential inconsistencies between Schlumberger's obligations, as articulated in the UNGPs, and the company's ongoing business operations and relationships in Russia that may contribute to, or be linked with, human rights harms. We have not received a response to our letter.

According to the latest available information, SLB continues to profit from its Russian operations. In our first letter, we noted that SLB pays approximately \$4.5 billion in taxes to the Russian government and the company's considerable workforce of 11,500 employees in the country. We also warned that the continued business with Schlumberger's Russian customers, which include sanctioned entities, such as Gazprom, Gazpromneft, Rosneft, TNK-BP, and Lukoil, may lead to potential sanctions violations while providing significant revenue to the Russian state, contributing to Russia's war efforts in Ukraine.

A recent report by Global Witness confirmed that not only is SLB hiring for hundreds of positions in Russia (almost identical to the rate of hiring to pre-invasion levels), has no intention to leave the market, but is also expanding in the country, acquiring new contracts its competitors that have left the market can no longer access.¹ As per the company's annual filing with the Securities and Exchange Commission, SLB's revenue from Russia accounted for around 6% of its total revenue - higher than the figure reported in the company's first-quarter report for 2022, which had estimated Russia's contribution to be 5% of its global revenues at that time. This implies that SLB's revenue from Russia increased after the country's invasion of Ukraine, indicating the heightened value of the Russian market to the company during this period.²

According to the report, SLB is 'entrenched' in Russia, boasting strategic agreements with universities and regional administrations, a training centre in Siberia, and facilitating increased drilling in Russia through the use of its highly specialised equipment.³

¹ Global Witness, "SLB Isn't Going Anywhere," April 10, 2023, <https://www.globalwitness.org/en/campaigns/stop-russian-oil/slb-isnt-going-anywhere/> (accessed April 11, 2023). Liz Hampton, "SLB wins Russia business as oilfield rivals exit after Ukraine invasion," *Reuters*, January 19, 2023, <https://www.reuters.com/markets/commodities/slb-wins-russia-business-oilfield-rivals-exit-after-ukraine-invasion-2023-01-19/> (accessed April 11, 2023).

² Global Witness (n 1).

³ Ibid.

SLB said in a statement that “while it was not divesting its holdings in Russia, the company has committed to discontinue new investments and technology deployments in the country. Still, it said, it continues to provide “certain products, spare and replacement parts, and other consumable goods” as part of its oil field services business there.”⁴

Customs data appears to show that SLB has continued to import vital equipment to Russia since February 2022, apparently in contravention of U.S. government sanctions which have: “Denied exports to, reexports to, and transfer within Russia and Belarus of items needed for oil refining. Also imposed additional license requirements to further limit the Russian oil sector by restricting the export, reexport and transfer of additional items needed for oil refining.”⁵

We are writing now to confirm whether SLB has continued to export these goods to Russia both from the US, the UK, Canada, as well as via third country importers.

We were also concerned to see that SLB has been placed on the Ukrainian National Agency for Prevention of Corruption (NAPC) list of international sponsors of the war.⁶ The NAPC notes the following reasons why they consider SLB to be a sponsor of war:

Despite Schlumberger’s announcement of a suspension of new investments in Russia in March 2022, the company is still fulfilling contracts and supplying technologies to companies engaged in developing Russian oil and gas fields. Some of Schlumberger's clients in Russia include Gazprom, Rosneft, and Lukoil, all of which are among the world's largest oil and gas companies and are under international sanctions. Schlumberger has provided equipment for developing continental and shelf deposits for its Russian customers over the years. Despite the suspension of new investments, the Russian market accounted for 6% of Schlumberger's total turnover, equivalent to \$1.21 billion, in the first half of 2022. During the full-scale invasion, Schlumberger's Russian revenues grew relative to the company’s global revenues, with a larger share of revenues compared to pre-war figures when Russia's share was only 5%. Schlumberger's Russian offices remain open, and the company is helping the Russian authorities with mobilization efforts for the ongoing war with Ukraine, including facilitating conscription notices.⁷

Some sources indicate that Schlumberger's recent collaboration with authorities to provide military call-ups and their decision to restrict Russian staff from working abroad has resulted in a backlash. These actions are perceived by some as a form of implicit support for the war in Ukraine by Schlumberger.⁸

Likewise, Olivier Le Peuch, the Chief Executive officer of SLB, Eric Maurice Liron, Chief officer of Schlumberger Logelco Inc., and Mark G. Papa, the non-executive chairman of SLB, are now personally

⁴ Amanda Drane, “As oilfield service companies left Russia after Ukraine invasion, Houston's SLB stayed - and profited,” Houston Chronicle, April 8, 2023, <https://www.houstonchronicle.com/business/energy/article/slb-russia-oil-sanctions-pullout-schlumberger-17852566.php> (accessed April 27, 2023).

⁵ U.S. State Department, “The Impact of Sanctions and Export Controls on the Russian Federation”, <https://www.state.gov/the-impact-of-sanctions-and-export-controls-on-the-russian-federation/> (accessed April 11 2023).

⁶ NAPC, “SLB – International Sponsor of War,” <https://sanctions.nazk.gov.ua/en/boycott/24/> (accessed April 11, 2023).

⁷ Ibid.

⁸ Liz Hampton, “EXCLUSIVE Schlumberger faces employee backlash in Russia over draft cooperation,” Reuters, October 14, 2022, <https://www.reuters.com/business/energy/exclusive-schlumberger-faces-employee-backlash-russia-over-cooperation-draft-2022-10-14/> (accessed April 11, 2023).

listed as individual sponsors of war.⁹

We note the SLB recently published its 2022 Sustainability report in which it emphasised respect for human rights:

“SLB conducts business in a manner that preserves and respects human dignity, as stated in our Code of Conduct, which applies to all employees of the company, contractors, suppliers, agents and business partners. Respecting human rights is a key expectation of SLB and we are committed to supporting the United Nations Guiding Principles on Business and Human Rights and embedding the UN Global Compact and its principles into our day-to-day business activities.”¹⁰

However, SLB’s continued operations in Russia seem to be in direct contradiction to the policies and emphasis placed on human rights in this report and are potentially leading to significant legal, financial, and reputational risks for the company.

We are reaching out to SLB again, to formally notify the company of the potential legal accountability it may face in the future, due to its continued actions in Russia. Companies remaining in Russia are open to significant legal risks, including potential civil and criminal liability under comprehensive sanctions regimes and recent international jurisprudence holding corporations and their officers responsible for human rights abuses abroad.¹¹ By remaining in Russia, companies may not only be exposed to these risks but may also become directly complicit in war crimes.¹²

⁹ NACP, “International Sponsors of War – Individuals” <https://sanctions.nazk.gov.ua/en/boycott/> (accessed April 11, 2023).

¹⁰ SLB, “2022 Sustainability Report,” <https://www.slb.com/-/media/files/sustainability/2022/sustainability-report-2022.ashx> (accessed April 27, 2023).

¹¹ International companies remaining in Russia are now at a greater risk of violating sanctions regimes as implementation of the legislation will likely involve transacting with sanctioned individuals or entities. Furthermore, new domestic civil and criminal cases against companies involved in violations of international law demonstrate the risk of significant liability for facilitating state-sponsored human rights abuses abroad (e.g., Lafarge case, Lundin case, Castel Group indictment, Nevsun holding, and Dassault Aviation, Thales, and MBDA France criminal complaint.) [Victoria Riello](#) and [Larissa Furtwengler](#), “Corporate Criminal Liability for International Crimes: France and Sweden Are Poised To Take Historic Steps Forward,” *Just Security*, September 6, 2021, <https://www.justsecurity.org/78097/corporate-criminal-liability-for-human-rights-violations-france-and-sweden-are-poised-to-take-historic-steps-forward/> (accessed November 14, 2022); The Sentry, “Breaking: France Opens War Crimes Inquiry Focused on Iconic Food and Beverage Conglomerate,” July 1, 2022, <https://thesentry.org/2022/07/01/7216/breaking-france-opens-war-crimes-inquiry-focused-iconic-food-beverage-conglomerate/> (accessed November 14, 2022); *Rfi*, “French technology firm charged over Libya cyber-spying,” July 2, 2022, <https://www.rfi.fr/en/business-and-tech/20210701-french-tech-firm-charged-over-libya-cyber-spying> (accessed November 14, 2022); Preston Lim, “Canadian Supreme Court Allows Corporate Liability for International Law Violations,” *Lawfare*, March 12, 2022, <https://www.lawfareblog.com/canadian-supreme-court-allows-corporate-liability-international-law-violations> (accessed November 14, 2022); Sherpa, “Aiding and abetting war crimes in Yemen: Criminal complaint submitted against French arms companies,” June 2, 2022, <https://www.asso-sherpa.org/aiding-and-abetting-war-crimes-in-yemen-criminal-complaint-submitted-against-french-arms-companies> (accessed January 2, 2023).

¹² Nataliya Popovych and Bennett Freeman, “Russia’s Putin is forcing foreign-owned companies to participate in his conscription campaign. It’s time to get out,” *Fortune*, October 13, 2022, <https://fortune.com/2022/10/13/russia-putin-foreign-owned-companies-conscription-campaign-sanctions-ukraine-war-international-europe-popovych-freeman/> (accessed November 14, 2022).

In consideration of the above points and B4Ukraine's [Declaration](#), we request an urgent dialogue with SLB's relevant senior management and staff to discuss the company's ongoing activities and relationships in Russia, associated risks to the people of Ukraine and the company, and potential steps to prevent/mitigate these risks. Please contact B4Ukraine at contact@b4ukraine.org to schedule a call by 5:00pm CET, May 11th, 2023.

Sincerely,

The B4Ukraine Coalition

Olivier Le Peuch
Chief Executive Officer
Schlumberger Ltd.
3600 Briarpark Drive
Houston, Texas, 77042
United States

01/11/2022

RE: Schlumberger business operations in Russia

Dear Mr. Le Peuch,

We write to you as a coalition of Ukrainian and international civil society organizations working to curtail the financial resources enabling the Russian invasion of Ukraine. In the spirit of respect for the fundamental rights of all people, the rules-based international order, and a prosperous global economy, we expect companies to demonstrate public support for the people, democracy, and territorial integrity of Ukraine, opposition to Russia's war of aggression, and alignment with the UN Guiding Principles on Business and Human Rights (UNGPs).

We request an urgent dialogue regarding potential inconsistencies between Schlumberger Limited's (Schlumberger) commitments on Russian aggression and human rights more broadly and the company's ongoing business operations and relationships in Russia that may contribute to, or be linked with, human rights harms.

Schlumberger's governance framework, which includes a Code of Conduct, Human Rights Position Statement, supply chain Human Rights Due Diligence, and a Modern Slavery Statement, formalises the company's commitment to "respecting the principles in the International Bill of Human Rights and conducting business in a manner that preserves and respects human dignity".¹ We also note that this framework applies to all of Schlumberger's operations, business relationships, and supply chain.

It has been eight months since Russia invaded Ukraine and the devastating impacts continue to shock the global conscience and shake the global economy. Russia is violating international humanitarian law (IHL), including by committing war crimes, crimes against humanity, and attacks on civilians and civilian infrastructure (e.g., mass executions, sexual violence, torture, and forcible transfer of civilians). More than 15,000 Ukrainians have been killed and injured and millions more have been forced to flee their homes, creating one of the largest humanitarian disasters and refugee crises of modern times.

On September 21, President Vladimir Putin further escalated the war by announcing a "partial mobilisation" of the Russian population. The accompanying legislation ([Article 9 of Federal Law No. 31-FZ](#)) mandates all organisations, including the 1,610 international companies that are currently

¹ Schlumberger, "The SLB Code of Conduct," <https://www.slb.com/-/media/files/about-us/the-blue-print-in-action-code-of-conduct.ashx> (accessed October 30, 2022).

operating on a full or limited scale in Russia, to conduct military registration of the staff if at least one of its employees is eligible for military service.² They must also assist with delivering the military summons to their employees, ensure the delivery of equipment to assembly points or military units, and provide information, buildings, communications, land plots, transport, and other material means of support to the war effort.

This legislation entails new and significant legal risks for companies remaining in Russia, including potential civil and criminal liability under comprehensive sanctions regimes and recent international jurisprudence holding corporations and their officers responsible for human rights abuses abroad.³ Companies may be exposed to financially material risks through operational restrictions, such as limitations of future government contracts.⁴

In response to this unprovoked and unjustified war⁵ many companies have left Russia. According to the respected Kyiv School of Economics Institute's #LeaveRussia [company tracker](#), Schlumberger announced in March that it would “immediately suspend new investment and technology deployment to our Russia operation”.⁶ However, Schlumberger also stated that it would continue to meet its existing contractual obligations, which means that the company will continue its extensive operations in the country, likely including the delivery of goods or services to sanctioned Russian entities.⁷

² Federal Law No. 31-FZ of February 26, 1997 "On mobilization training and mobilization in the Russian Federation" (as amended), <https://base.garant.ru/136945/> (accessed October 30, 2022).

³ International companies remaining in Russia are now at a greater risk of violating sanctions regimes as implementation of the legislation will likely involve transacting with sanctioned individuals or entities. Furthermore, new domestic civil and criminal cases against companies involved in violations of international law demonstrate the risk of significant liability for facilitating state-sponsored human rights abuses abroad (e.g., Lafarge case, Lundin case, Castel Group indictment, Nevsun holding, and Dassault Aviation, Thales, and MBDA France criminal complaint.) Victoria Riello and Larissa Furtwengler, “Corporate Criminal Liability for International Crimes: France and Sweden Are Poised To Take Historic Steps Forward,” *Just Security*, September 6, 2021, <https://www.iustsecurity.org/78097/corporate-criminal-liability-for-human-rights-violations-france-and-sweden-are-poised-to-take-historic-steps-forward/> (accessed October 30, 2022); The Sentry, “Breaking: France Opens War Crimes Inquiry Focused on Iconic Food and Beverage Conglomerate,” July 1, 2022, <https://thesentry.org/2022/07/01/7216/breaking-france-opens-war-crimes-inquiry-focused-iconic-food-beverage-conglomerate/> (accessed October 30, 2022); “French technology firm charged over Libya cyber-spying,” Rfi, July 2, 2022, <https://www.rfi.fr/en/business-and-tech/20210701-french-tech-firm-charged-over-libya-cyber-spying>; Preston Lim, “Canadian Supreme Court Allows Corporate Liability for International Law Violations,” *Lawfare*, March 12, 2022, <https://www.lawfareblog.com/canadian-supreme-court-allows-corporate-liability-international-law-violations> (accessed September 26, 2022); Sherpa, “Aiding and abetting war crimes in Yemen: Criminal complaint submitted against French arms companies,” June 2, 2022, <https://www.asso-sherpa.org/aiding-and-abetting-war-crimes-in-yemen-criminal-complaint-submitted-against-french-arms-companies> (accessed October 30, 2022).

⁴ Venable LLP, “Do You Contract with State Governments? If So, Beware of Emerging State Sanctions’ Obligations Related to Russia and Belarus,” *JD Supra*, June 3, 2022, <https://www.jdsupra.com/legalnews/do-you-contract-with-state-governments-6537229/> (accessed October 30, 2022).

⁵ The UN General Assembly condemned Russia’s “aggression against Ukraine” and demanded that Moscow “unconditionally withdraw all of its military forces from the territory of Ukraine within its internationally recognized borders.”

⁶ Schlumberger, “Update on Russia Operations,” March 18, 2022, <https://www.slb.com/about/newsroom/press-release/2022/pr-2022-0318-update-on-russia> (accessed October 30, 2022).

⁷ Amanda Battersby, “Leading international contractors turn their back on Russia,” *Upstream*, March 20, 2022,

As of 2022, the Russian market represented 5 percent of Schlumberger's total revenue, Schlumberger contributed more than \$4.5 billion in taxes to the Russian government, and the company employed 11,500 workers in the country.⁸ Schlumberger's Russian customers include sanctioned entities, such as Gazprom, Gazpromneft, Rosneft, TNK-BP, and Lukoil. In 2021, Schlumberger's subsidiary Cameron International Corp. was subject to a \$1.4 million penalty for violating sanctions against Gazprom-Neft Shelf. After Schlumberger's commitment to suspend technology deployment, Russian oil services company TNG-Group, stated it was using Schlumberger equipment in a Gazprom-licensed and controlled field.⁹ These activities potentially expose the company to sanctions violations while providing significant revenue to the Russian state.

Finally, in light of the size of the company's workforce and infrastructure, the "partial mobilisation" order may entail severe risks to Schlumberger as it facilitates the conscription of Russian staff and may be required to provide additional resources (e.g., building, transport, products/services) to support the invasion of Ukraine. As of October 14, 2022, Schlumberger has already experienced significant employee backlash as its workers have received military draft notices through the company and Schlumberger has not allowed employees to work remotely in order to escape the draft.¹⁰

These activities alone risk enabling and financing Russia's violations of IHL and human rights law during the ongoing invasion and occupation of Ukraine and violating Schlumberger's human rights commitments. Furthermore, remaining in the Russian market risks incurring heightened legal, regulatory, operational, and financial risks associated with companies being required to provide direct support to the internationally sanctioned Russian military.

We seek to understand how Schlumberger has conducted and continues to conduct heightened human rights due diligence, per its stated policy and the UNGPs concerning due diligence in conflict-affected areas, and how the findings of such a process have resulted in Schlumberger's continued business activities and relationships. As noted by the UNGPs:

...the more severe the abuse, the more quickly the enterprise will need to see change before it takes a decision on whether it should end the relationship. In any case, for as long as the abuse continues and the enterprise remains in the relationship, it should be able to demonstrate its own ongoing efforts to mitigate the impact and be prepared to accept any consequences – reputational, financial or legal – of the continuing connection.

With the above points in mind and in consideration of B4Ukraine's [Declaration](#), we request an urgent dialogue with relevant Schlumberger senior management and staff to discuss the company's ongoing activities and relationships in Russia, associated risks to the people of Ukraine and the company, and potential steps to prevent/mitigate these risks. Please contact Eleanor Nichol at

<https://www.upstreamonline.com/finance/leading-international-contractors-turn-their-back-on-russia/2-1-1188073> (accessed October 30, 2022).

⁸ Schlumberger, "Schlumberger in Russia and Central Asia,"

https://www.slb.ru/about/schlumberger_russia_and_central_asia/ (accessed October 30, 2022).

⁹ M. Mikheev, "TNG-Group is conducting research with a high-tech complex of Schlumberger equipment," *Neftegaz.ru*, October 30, 2022,

<https://neftegaz.ru/news/vtrende/748423-tng-grupp-vedyet-issledovaniya-vysokotekhnologichnym-komplekso-m-oborudovaniya-shlyumberzhe/> (accessed October 30, 2022).

¹⁰ Liz Hampton, "EXCLUSIVE Schlumberger faces employee backlash in Russia over draft cooperation," *Reuters*, October 14, 2022,

<https://www.reuters.com/business/energy/exclusive-schlumberger-faces-employee-backlash-russia-over-cooperation-draft-2022-10-14/> (accessed October 30, 2022).

enichol@businessforukraine.info to schedule a call. We kindly ask for your response by 5:00pm CET, 14th November 2022.

Please do not hesitate to get in touch if you require any further information.

Sincerely,

Eleanor Nichol
Executive Director
The B4Ukraine coalition