

## BECHTEL COMPLIANCE TRAINING PROGRAM

Compliance curriculum is designed to assure that all Bechtel employees in a given job family have the same basic competency in the substantive areas relevant to their jobs regardless of the business unit or location to which they are currently assigned. Courses are assigned based on the compliance risk level of a particular job family. More specialized instruction may also be required by an employee's base or assigned organization, based on the risk level of their specific job assignment.

BU Course	Course Description	Required Audience <sup>1</sup>	Required Refresh	Languages <sup>2</sup>
ETH0002-X1	Bechtel Business Ethics: Code of Conduct	All Employees	3 Years	A, C-S, C-Tr, E, Fr, P, Sp, T
RIM101	Managing Bechtel Records and Information	All Employees	3 Years	E, Fr, Sp
RIM102	Managing Bechtel Email	All Employees	3 Years	E, Fr, Sp
ETH0007-X1 (Basic Course)	Global Bribery and Corruption Awareness <sup>3</sup>	All Employees	2 Years	A, C-S, C-Tr, E, Fr, P, Sp
ETH0010-X1 (Basic Course)	Anti-Boycott: How to Handle Boycott Requests <sup>4</sup>	All Employees except Project Controls, ES&H, Quality, IS&T, Ofc Svcs, Admin, & Secretarial <sup>5</sup>	3 Years	E, Fr
PM161 (Intermediate)	Review of US Anti-Boycott Laws	Finance, Project Mgmt, BD, Start-up, Contracts, BBS Procurement, L&RM, IA, & HR	One time only, then take ETH0010-X1 as refresher	English only
ETH0009-X1 (Basic Course)	Export Controls, Commercial Products	All employees except Project Mgmt, Contracts, Engineering, Procurement, L&RM, IA, HR & BEO <sup>6</sup>	2 Years	C-S, E, Fr, P, Sp
SC140 (Intermediate)	Export Control (Online or Instructor-led)	Project Mgmt, Contracts, Engineering, Procurement, L&RM, IA, HR & BEO	2 Years	English only
ETH0006-X1	Economic Trade Sanctions and OFAC	Procurement, Finance, L&RM, IA, HR, BBS & BEO	2 Years	E, Fr, Sp

<sup>1</sup> Executive board members are subject to the same requirements as all employees. Non-executive board members receive periodic training for the Bechtel Code of Conduct, conflict of interest, anti-corruption, and anti-bribery.

<sup>2</sup> Language Codes: Arabic (A), English (E), French (Fr), Portuguese (P), Spanish (Sp), Simplified Chinese (C-S), Traditional Chinese (C-Tr), and Thai (T).

<sup>3</sup> Acceptable Substitute: Instructor Led PM159 or Instructor Led ETH0001-X1

<sup>4</sup> Acceptable Substitute: Instructor Led PM161

<sup>5</sup> Employees in Montreal and Chile who require instruction in French or Spanish may take the basic course.

<sup>6</sup> Acceptable Substitute: Instructor Led SC140