



INFRASTRUCTURE
MINING & METALS
NUCLEAR, SECURITY & ENVIRONMENTAL
OIL, GAS & CHEMICALS

2019 Modern Slavery Act Statement

This statement is made on behalf of Bechtel Limited and Bechtel Management Company Limited (collectively referred to as "Bechtel") pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") and constitutes Bechtel's slavery and human trafficking statement for the financial year ending 31st December 2018.

Bechtel is committed to respecting human rights everywhere we operate, consistent with Bechtel's Vision, Values & Covenants. Within Bechtel and throughout our supply chain, we are committed to treating people with dignity and respect. We expect our business partners, contractors and suppliers to adhere to ethical business conduct consistent with our own.

ORGANISATION'S STRUCTURE

Bechtel is engaged in engineering, construction, and project management services. We work within a diverse value chain of business partners and suppliers and recognize that each entity in this supply chain has a duty to respect human rights. As customers, we take an active role in communicating our expectations to suppliers.

OUR POLICIES

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our Policy Against Human Trafficking and Slavery reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business, or in our supply chains where we have identified that our greatest risk lies.

Consistent with the principles set forth in our Bechtel Code of Conduct, Bechtel does not tolerate the use of slavery, servitude, forced or compulsory labor or human trafficking in the performance of Bechtel contracts by our employees, our contractors, business partners or suppliers.

Our global supply chain program supports Bechtel's goal of ensuring that our suppliers are also committed to acting ethically and ensuring modern slavery and human trafficking is not taking place anywhere in their supply chain or business, including in the recruitment of workers to Bechtel projects.

Our employees are responsible for complying with our policies that seek to prevent modern slavery and human trafficking. Bechtel employees found to be in violation of this policy are subject to discipline, up to and including termination.

MODERN SLAVERY AND HUMAN TRAFFICKING COMMUNITY OF PRACTICE



In 2018, Bechtel created a cross-functional group to share updates, ideas and good practices across the organization to address human trafficking and slavery issues, support the implementation of relevant legislation, policies and compliance obligations.

REPORTING VIOLATIONS

Bechtel has resources available to facilitate reporting and protect workers who lodge complaints or report violations. We have an Ethics HelpLine available as a confidential resource at ethics@bechtel.com or by phone at 1-800-BECHTEL (1-800-232-4835) from the USA and 0800206-1009 from the UK. Where allowed by law, the Ethics HelpLine allows anonymity. Bechtel does not tolerate threats or acts of retaliation against anyone for raising legitimate concerns. The company is committed to investigating and responding to such concerns in a prompt and responsible manner.

DUE DILIGENCE PROCESS

Bechtel has taken several steps to identify, assess, and mitigate the risk of slavery and human trafficking in our supply chain, including the following:

1. We set clear expectations for our suppliers that Bechtel does not tolerate the use of slavery, servitude, forced or compulsory labor or human trafficking, as set forth in Bechtel's Code of Conduct. We expect our suppliers to meet these expectations. Bechtel's supplier portal (supplier.bechtel.com) clearly communicates Bechtel's expectations.
2. Bechtel's standard terms and conditions with suppliers and subcontractors that we consider have a moderate to high risk modern slavery exposure, include our expectations that no human trafficking or slavery is used anywhere in the supplier/subcontractor's business or by any of the suppliers/subcontractors in its own supply chain. Our suppliers/subcontractors agree to comply with all applicable local and national laws and regulations. We have the right to terminate a contract with a supplier/subcontractor for breach of our terms and conditions.
3. In 2017, Bechtel added a section into the quality surveillance checklist of its supplier facilities to be vigilant and report any signs of underage workers, involuntary labor, worker abuse and note the presence of a grievance mechanism in connection to forced labor and human trafficking. In 2018, Bechtel obtained a third-party audit report of workplace conditions covering key suppliers. The workplace conditions assessment was implemented at select sites which were deemed highest risk across our supply chain and the results did not uncover any indications of modern slavery.
4. In 2018, Bechtel updated its standard terms and conditions of contract with staff agencies employed in the United Kingdom to include that Bechtel does not tolerate slavery or human trafficking in the performance of Bechtel contracts and imposes a commitment from the agency to adhere to these standards and flow down the requirement to third party agency contracts.

VERIFICATION OF SUPPLY CHAIN

Our procurement process includes vetting new suppliers and carrying out a risk analysis based on the nature and value of the product or service. Our vetting process since 2017 includes collecting information from the suppliers, reviewing the supplier's information and background and performing a risk-based analysis considering the supplier's location and scope of work. As part of the vetting process we use data analytics to assess modern slavery risks.



Before we engage certain subcontractors, we conduct due diligence that includes screening for any ethics and compliance red flags, including modern slavery and human trafficking.

In 2018, to inform our supplier engagement plan, we completed an assessment of 30,000 Bechtel suppliers (active or recently active) that considered risks related to modern slavery or human trafficking. Based on this assessment we were able to perform enhanced reviews of specific higher-risk suppliers to mitigate any concerns about forced labor.

TRAINING

In 2018 Bechtel developed an online training module focusing on the prevention of modern slavery and human trafficking in our supply chains and business. This targeted training has been made available to all Bechtel employees and will become mandatory for those employees who may have a greater risk of exposure to these areas of risk in their work.

A specific off-the-shelf training on identifying signs of human trafficking has been developed for additional targeted implementation expectations for Bechtel colleagues in groups such as Human Resources, Procurement and Ethics and Compliance who may have a greater exposure to these areas of risk in their work. This slide deck also serves as a training for voluntary use during safety awareness briefings, project kick-off briefings, orientations, team seminars and other similar circumstances.

EXTERNAL ENGAGEMENT

We engage with external stakeholders to inform our risk management, as well as share good practices:

- a. Founding member of the Building Responsibly Initiative (the first engineering and construction industry coalition dedicated to promoting worker welfare). In 2018, we contributed to the development of the *Worker Welfare Principles* that this Initiative published.
- b. Vice chair of the U.S. Council for International Business Corporate Responsibility Committee on Business and Human Rights.
- c. Collaborating with U.S. Agency for International Development Countering Trafficking in Persons Initiative (CTIP) by providing industry knowledge and tools to help raise the standards for the construction industry in Southeast Asia.

June 6, 2019

A handwritten signature in black ink, appearing to read "SK", written over a horizontal line.

Steven Kay

For and on behalf of Bechtel Limited

June 24, 2019

A handwritten signature in black ink, appearing to read "RF", written over a horizontal line.

Richard Freer

For and on behalf of Bechtel Management
Company Limited