



Anti-Retaliation Policy

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This policy applies globally to all Bechtel employees, and to members of the board of directors, agents, consultants, contract labor, and others when they are representing or acting for, or on behalf of, Bechtel.

Bechtel is committed to maintaining a work environment that is free of harassment, intimidation, discrimination and retaliation for engaging in protected activity such as reporting violations or participating in an investigation pertaining to alleged violations of laws, the Code, policies, or procedures. Crucial to these objectives is promoting an atmosphere where employees and others feel safe to engage in frank, honest communication – raising questions or concerns at any time without fear of retaliation.

Bechtel strictly prohibits any form of retaliatory action against employees who raise issues or ask questions, make reports, participate in an investigation, refuse to participate in suspected improper or wrongful activity, or exercise workplace rights protected by law (in each case “Protected Activity”). Situations or behaviors that could lead to an employee engaging in a Protected Activity include, but are not limited to the following:

- Discrimination or harassment;
- Fraud;
- Unethical or unprofessional business conduct;
- Non-compliance with Bechtel policies/procedures, including the Code of Conduct;
- Real or potential threats to Bechtel workers or the public’s health and/or safety;
- Violations of local, state or federal laws and regulations;
- Other illegal or improper practices or policies.

Protection from retaliation

Any Bechtel employee who engages in Protected Activity will be shielded from retaliation. Retaliation occurs when an employer takes an Adverse Action against an employee because she/he engaged in a Protected Activity. Adverse Action includes, but is not limited to:

- Demotion;
- Suspension;
- Termination;
- Failing to hire or consider for hire or promotion;
- Failing to give equal consideration in making employment decisions or to make impartial employment recommendations;
- Adversely impacting working conditions or otherwise denying any employment benefit to an employee;
- Creating a hostile or intimidating work environment.

Bechtel prohibits retaliation even if the concerns raised are not confirmed following an investigation. However, an employee may be subject to Adverse Action if the employee knowingly made a false allegation, provided false or misleading information in the course of an investigation, or otherwise acted in bad faith.

This anti-retaliation policy does not exempt employees from the consequences of their own misconduct or inadequate performance, and self-reporting such issues is not Protected Activity. The policy also does not prevent Bechtel from managing employee performance and addressing conduct issues after an employee has engaged in Protected Activity, so long as Protected Activity is not the reason for the performance management.

Obligation to Raise Concerns

Bechtel depends on its employees to raise questions or concerns so that the company can take appropriate action. All employees are required to report any suspicion of improper or wrongful activity. Several different channels for reporting are available, which are explained in detail in the Bechtel Code of Conduct.

Reports of suspected improper or wrongful activity will be treated confidentially, and employees have the choice to report concerns anonymously. If submitting a concern anonymously, it is important to provide sufficiently detailed information regarding the subject matter of the concern and identify potential witnesses to enable Bechtel to effectively address the concern.

Employees who believe they have either witnessed retaliation or been personally retaliated against or that any other violation of this policy has occurred, or who have questions concerning this policy, must immediately notify the Human Resources Department, an ethics and compliance officer or the Bechtel Ethics HelpLine. Employees may also, where appropriate, contact appropriate governmental authorities. Bechtel takes all claims of retaliation very seriously and reports will be reviewed promptly and investigated where appropriate.

Consequences for Policy Violation

Any Bechtel employee who retaliates against an employee engaged in a Protected Activity or who otherwise violates this policy is subject to disciplinary action, up to and including termination of employment.