



# Commitments to Service & Risk Assessment

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Bechtel's "Commitments to Perform Services and Risk Assessment" policy specifies the detailed internal process and levels of approval required before any business can be undertaken by the company. It identifies a wide variety of risks that must be evaluated and disclosed as part of the approval process. There is a specific category of ethics and compliance risks that must be thoroughly analyzed before a Bechtel business entity can obtain corporate approval to take on work.

[Excerpt]

## **Business Ethics and Compliance Issues**

Discuss any Business Ethics and compliance issues such as FCPA, OFAC, the Patriot Act, terrorist financing violations as well as any money laundering or other suspicious payments, import/export license requirements, etc. The existence of a Business Ethics or compliance issue may constitute an unusual risk.

Does the make-up of the customer organization raise any issues that would compromise Bechtel's ethical standards (this should not be limited to the customer's CEO or President)?

State what due diligence has been undertaken on the customer, the corporate group of companies of which the customer forms part and the key personnel of those entities. Contact the Legal Department for the latest due diligence process requirements.

Will this project be located in a High Risk Country as defined by Bechtel Security; or first time in-country presence in the past 10 years? If recommended by the Legal Department, projects located in such countries must have a project-specific ethics and compliance program procedure, including a compliance training plan for all project employees.