



Due Diligence for Joint Associations

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Associations (collaborative business arrangements between a Bechtel organization and a third party) are used to enhance Bechtel's competitiveness, provide access to special technical or additional financial resources, permit sharing of costs and risks, meet requirements for local participation, and/or allow Bechtel to engage in certain market segments more effectively than it could alone.

Bechtel will only enter into associations with others having ethical standards compatible with its own. All activities must conform to recognized standards of business conduct, the Business Principles for Countering Bribery in the Engineering and Construction Industry and comply with the laws, rules, regulations, and decrees of the United States, the home country of the relevant Bechtel entity and those countries in which the services are performed. Payments for improper influence, either directly or indirectly, are prohibited in all cases. Violations of the terms of the Foreign Corrupt Practices Act by an association partner can result in the imposition of severe criminal and civil penalties not only upon Bechtel, but also upon any officer, director, agent or employee who engages in or authorizes proscribed activities.

Approval Requests

Approval requests must address the following, as applicable, with sufficient information to permit an informed decision:

- Information about the proposed associate(s) (including a brief history, financial report, assessment of technical/professional capabilities, reputation, key personnel, past affiliations, prior Bechtel experience and any other facts relevant to making a full and informed decision).
- Any character, reputation, ethics or compliance issue (e.g., FCPA, OFAC, the Patriot Act, terrorist financing violations as well as any money laundering or other suspicious payments, requirement for use of an agent, import/export license requirements).
- Associate's commitment to Bechtel's standards regarding ethics, compliance with laws, health, safety, the environment and sustainable development.
- Key management and governance principles.

Key Criteria for Associations

- Associations may be with a person, persons, company, or government (including government agencies and government-sponsored or government-owned companies) of stature and integrity.
- Association partners must share and have a demonstrably common understanding of Bechtel's ethical standards and commitment to legal requirements (e.g., FCPA, import/export license requirements).
- Association partners must share Bechtel's commitment to safety, health, the environment and sustainable development.
- Principals in non-Bechtel interests should be persons of demonstrable integrity and competence, and with requisite financial and other capabilities.