



Ethics HelpLine

Ethics Helpline

Bechtel is committed to the highest standards of ethical business conduct and depends on its employees and others to report violations or potential violations of the Bechtel Ethics [Code of Conduct](#) so that the company can take appropriate action and remedy the situation. We also encourage you to use [the Helpline](#) to simply ask a question or seek guidance on how to apply the Code of Conduct.

If you do have a question or concern, you may [submit it here](#). Employees may also talk to their supervisor, their Ethics & Compliance Officer, or any member of management.

It is not necessary to provide your name; however, if you do, your report will be kept confidential to the extent permitted by law and Bechtel's need to fully investigate the matter. Only those with a need to know will be involved in, or know of, the investigation.

All reports of suspected misconduct are taken seriously, independently considered, and investigated appropriately. Our Chief Ethics and Compliance Investigator, with 35 years of investigative experience, reviews every investigation report for quality and thoroughness. When an Ethics and Compliance investigation is substantiated, appropriate action is taken.

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 – is crucial to maintaining a work environment that is free of harassment, intimidation, discrimination and retaliation. Learn about our anti-retaliation policy [here](#).

Ethics Helpline and Trust

Nancy Higgins, Bechtel's Chief Ethics and Compliance Officer, shares thoughts about building trust in the Ethics Helpline as a critical element of an effective ethics and compliance program.

On increasing trust in an employee helpline

Our [Vision, Values & Covenants](#) provide the core set of values that guide Bechtel employees as we perform our work every day. One of those values is Ethics which means we are uncompromising in our integrity, honesty, and fairness.

One of the four performance measures that each employee is assessed against annually is Behavior. The detailed criteria for assessment is aligned to the Bechtel Behavioral Framework that defines seven key behaviors essential for driving individual, team, and company success: accountable; collaborate; communicate; customer focus; deliver; problem solve; and role model with reference to the Vision, Values and Covenants. The Framework builds on the foundation of our Vision, Values & Covenants, illustrating what those behaviors look like across all levels of the organization.

We communicate to our colleagues that the Ethics Helpline is one of the many ways to contact Ethics and Compliance for advice and guidance or if they are concerned that the Bechtel high standards of ethical business conduct have not been met. Colleagues can also contact their local ethics and compliance officer, if they prefer to communicate face-to-face. All Bechtel colleagues can access our 24/7/365 Helpline by telephone, by email, by letter, or through the link on the Internet.

We encourage – and expect – all Bechtel colleagues to speak up if they become aware of any unlawful or unethical conduct.

We make sure our colleagues know that they don't have to be certain that a violation has occurred before contacting the Helpline — it is enough that they think a violation may have happened. Colleagues contacting the Helpline can remain anonymous if they prefer. While it is helpful if an investigator can contact the source with follow-up questions, we do not want to create an impediment to our colleagues voicing their concerns.

We highlight the independence and professional qualifications of the Ethics & Compliance investigations group. The team is supervised by the Chief of Investigations with 35 years of experience associated with U.S. government and corporate investigations. The performance of each investigations team member is reviewed annually. All investigation

reports are reviewed by the Chief of Investigations and any complaints about the handling of investigations can be made to the Chief Ethics & Compliance Officer.

Perhaps the best way to build trust is to share information with our employees about the [HelpLine activity](#). Every year, we share high-level data about the nature and outcomes of the allegations and inquiries received by Ethics and Compliance in the previous year. We also publish articles about real Ethics cases on myBechtel, our internal SharePoint site, and through other media. Regular [From the Ethics Case File column](#) in the Bechtel Globe, our internal magazine, discusses actual cases -- what was alleged by a HelpLine reporter or how the information came to us, how the allegation was investigated, and what the consequences were when the misconduct was substantiated – so our colleagues understand how the process works in our everyday work.

We also share elements of our ethics and compliance program [here](#).

On common employee concerns

Bechtel, like many companies, conducts an ethics and compliance survey in which employees are asked if they observed misconduct over the past year, whether they reported what they saw, and if they didn't report it, why not? Some employees say that they did not feel they had enough information or didn't know whether the conduct or incident they observed was a violation of Bechtel's [Code of Conduct](#).

A common reason for employees at most companies not to report an ethics violation is fear of retaliation or other negative consequences for speaking up. Our employee survey results show that most Bechtel employees believe they can report unethical conduct or practices without fear of retaliation, and that they feel comfortable reaching out to someone at the company to seek advice about ethical dilemmas or concerns.

At Bechtel, our goal is to provide our people a suitable culture and the right mechanisms so that they can raise any ethical concerns without fear of retaliation—and know that their concerns will be taken seriously and handled appropriately. Our [From the Ethics Case File column](#) addresses these concerns by providing real-life examples of how cases are handled.

No Bechtel employee should be asked to conduct business in a manner that is unethical, and the company will support any employee who refuses to violate the Code of Conduct and speaks up to report the situation to Ethics & Compliance.

On building employee trust in company and its leaders

Company leaders must frequently talk about their commitment to integrity and company expectations for ethical behavior. They need to do this in a way that is authentic and sincere – by sharing stories about their personal experiences and talking about how easy it is to damage the company's reputation.

Every year, all Bechtel colleagues participate in mandatory ethics awareness training workshops. These are interactive sessions conducted by the supervisor for each work group. Teams discuss hypothetical scenarios based on real cases and practice recognizing, addressing and resolving ethics or compliance issues. These sessions provide an opportunity for employees to see how the supervisor thinks about ethics issues and helps them feel more comfortable coming forward if and when the need arises.

Each workshop begins with a message from our CEO about the importance of speaking up, his personal commitment to taking action when wrongdoing occurs, and his assurance that retaliation for raising concerns will not be tolerated.

On measuring employee trust in hotline procedures

Results from our most recent Ethics Survey show that Bechtel employees have a high level of awareness of the company's expectations for ethical business conduct. Almost all Bechtel colleagues who responded to the survey told us they understand Bechtel's Code of Conduct; 98% said they understand what constitutes ethical conduct in their jobs and know how to recognize misconduct when they see it.

Awareness of ethics and compliance resources was also high, with 96-97% of colleagues telling us they know how to contact the Ethics HelpLine and know how to obtain Ethics & Compliance guidance. I was particularly pleased to see that 96% told us they know how to contact their organization's ethics and compliance officer -- a 3% increase since the previous survey.

These results show that our colleagues' knowledge of the Ethics & Compliance program and their trust in the Ethics HelpLine has increased substantially since we began conducting Ethics & Compliance Surveys in 2009.

In addition to our ethics and compliance survey, we look at the [HelpLine data](#) to see how many employees are coming forward with ethics concerns, what kind of concerns are being raised, and whether employees are comfortable identifying themselves or choose to remain anonymous. Over time, we are looking to see an increase in the number of people calling the HelpLine for advice vs. those calling to report violations. Further, we look for a gradual increase of the percentage of people who feel comfortable identifying themselves when contacting the HelpLine vs. the number of employees remaining anonymous.