

Political Activities

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Bechtel engages with policy makers from time to time to protect the interests of the company and its employees, as well as advance policies that strengthen the free enterprise system, create jobs, promote economic growth and opportunity, support environmental stewardship and sustainable development, and advance business needs.

We work to inform legislators on balanced, practical approaches to legislative issues that impact our business, people and customers.

All Bechtel engagements with policy makers and regulators are governed by our <u>Vision, Values and Covenants</u>, <u>Code of Conduct</u>, and applicable laws and regulations.

Bechtel does not contract, i.e. hire, active (currently serving) politicians for services. Due diligence process for potential third-party hires such as subcontractors, partners, agents or representatives includes a specific review of employment and ownership to identify any direct or indirect connections to active politicians.

Bechtel follows applicable laws and regulations when hiring former public officials. Former public officials are required to comply with the laws and regulations of the agency where they formerly worked.

Specific rules govern the hiring of former public officials in Bechtel's government business. Prior to initiating contact or having discussions, whether formal or informal, with a government employee regarding possible employment, the appropriate Human Resources Department (HR), in conjunction with the Legal Department and Ethics and Compliance, makes an initial determination of whether employment discussion can begin. Before any offer for employment can be made, the prospective employee must submit a written statement setting forth any government restrictions applicable to their activities for Bechtel. HR, Ethics & Compliance and Legal ensure that any such limitations would not prohibit or unduly restrict the prospective employee from carrying out the intended duties and authorities of the position. HR maintains adequate records of any former officials employed or retained by the company to respond to related government audit requests and support representations required in proposals.

Bechtel does not donate to political campaigns outside the United States.

Bechtel does not make corporate political contributions to federal office candidates in the U.S., as such contributions are prohibited by law. Bechtel policy requires approval by the Manager of Government Affairs for any federal, state and local political activity. Bechtel has an employee-run Political Action Committee (PAC). PAC contributions can be <u>found</u> here. More information on our political activities in the U.S. can be found here.

Bechtel discloses lobbying activities per U.S. law and requires all its contractors, representatives, agents, and consultants to do the same.

U.S. House of Representatives Lobbying Disclosures

U.S. Senate Lobbying Disclosure

Bechtel requires all contractors, representatives, agents, consultants, and lobbyists to abide by the applicable laws and regulations, our <u>Vision, Values and Covenants</u>, and the <u>Code of Conduct</u>. All agreements with lobbyists include contractual requirements to follow applicable law. A failure to do so is grounds for termination. Lobbyists also sign a statement committing to follow Bechtel Standards of Conduct.

