



Bechtel's Expectations for Suppliers' and Subcontractors' Conduct

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Bechtel's Expectations for Suppliers' and Subcontractors' Conduct

By submitting a proposal, bid or quotation to Bechtel, the Supplier acknowledges, accepts and agrees that these Supplier and Subcontractor expectations ("Expectations") are binding obligations. Suppliers shall comply with these expectations and shall ensure that their subcontractors and lower-tier suppliers do the same. Compliance with these expectations is condition of eligibility for award and a continuing obligation throughout performance.

The Bechtel group of companies ("Bechtel") works only with qualified suppliers and subcontractors who commit to safely and responsibly deliver quality goods and services—on time and within budget. Although quality, cost, and timeliness are important, we will not solicit and award purchase orders and subcontracts to suppliers and subcontractors that do not meet our standards for safety, ethics, conduct, and protection of human rights. Bechtel is committed to the highest safety, ethical, and human rights standards in the industry, and we expect the same dedication from our supplier and subcontractor organizations.

In addition to complying with the terms of our purchase order or subcontract and Applicable Law (defined below), suppliers and subcontractors must comply with and must cause their subsuppliers and subcontractors at all tiers of performance to comply with the terms set forth herein. To the extent of a conflict between the terms of our purchase order or subcontract, Applicable Law, and the terms set forth herein, the most stringent shall apply. To the extent that the purchase order or subcontract does not contain specific requirements the terms hereof shall apply. Suppliers and subcontractors must immediately notify Bechtel in writing of any actual or potential violations by it, or any of their subsuppliers or subcontractors of the terms of our purchase order or subcontract, Applicable Law, or the terms set forth herein.

Compliance with Laws and Regulations

Suppliers and subcontractors must be familiar with and follow and cause their subsuppliers and subcontractors of every tier to comply with all Applicable Laws at all times in the performance of the work. Suppliers and subcontractors must also ensure that their suppliers and subcontractors at every tier give an identical representation in their subcontracts and purchase orders for any portion of the work. "Applicable Law" means all applicable national, federal, state, and local laws, ordinances, statutes, rules regulations, orders or decrees in effect at the time the work is performed.

Anti-Corruption Compliance

Bechtel is committed to full compliance with all domestic and international anti-bribery laws, regulations, and conventions that prohibit corrupt actions, including, but not limited to bribery, in obtaining or retaining business or obtaining any other improper business advantage. In addition, Bechtel policy prohibits making facilitating payments of any kind, that is, payments to secure or expedite the performance of routine government actions. Facilitation payments are strictly prohibited.

Suppliers and subcontractors shall comply and shall cause their subsuppliers and subcontractors at every tier to comply with all Applicable Laws of the United States of America and of all other applicable jurisdictions that prohibit corrupt actions in obtaining or retaining business or obtaining any other improper business advantage, including without limitation, all provisions of the United States Foreign Corrupt Practices Act, the U.K. Bribery Act of 2010, and the U.K. Criminal Finances Act of 2017, as well as any analogous anti-bribery or anti-corruption laws in jurisdictions where they operate.

Conflict Minerals

Although Bechtel is not a manufacturer and is a privately held company, suppliers and subcontractors shall and shall cause their subsuppliers and subcontractors to adhere to Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, which aims to prohibit the use of conflict minerals (gold, tungsten, tantalum, and tin) from the Democratic Republic of the Congo or adjoining countries. Suppliers and subcontractors shall and shall cause their subsuppliers and subcontractors to conduct due diligence to preclude the sales or installation of any materials or equipment that contain conflict minerals, consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflicted-Affected and High-Risk Areas.

Data Protection

Bechtel recognizes and respects the privacy of the individuals whose personal information it collects, uses and otherwise processes in the course of its business. Suppliers and subcontractors must and must cause their subsuppliers and subcontractor at every level to comply with all applicable data protection and privacy laws and regulations in the performance of the work, including the EU <https://www.lawinsider.com/dictionary/data-protection-laws> Data Protection Directive 95/46/EC (GDPR), and must enter into a data processing agreement when requested by Bechtel or required by law. Suppliers and subcontractors must also ensure that subsuppliers and subcontractors at every tier give an identical representation in their subcontracts and purchase orders for any portion of the work and enter into a data processing agreement when requested by Bechtel or required by Applicable Law.

Equal Opportunity

Bechtel is an equal opportunity employer, and employment decisions are made without regard to race, color, gender, age, religion, national origin, ancestry, physical or mental disability, veteran status, sexual orientation, gender identity, caste, and other grounds for discrimination prohibited by applicable law. Suppliers and subcontractors must and must cause their subsuppliers and subcontractors at every tier to have employment policies and practices that prohibit employment decisions being made with regard to any legally protected characteristics.

For work performed in the United States, and to the extent the supplier or subcontractor is not otherwise exempt, the suppliers and subcontractors must abide by the requirements of 41 CFR §§ 60-1.4(a), 60-300.5(a), and 60-741.5(a). These regulations prohibit discrimination against qualified individuals based on their status as protected veterans or individuals with disabilities and prohibit discrimination against all individuals based on their race, color, religion, sex, sexual orientation, gender identity, or national origin. Moreover, these regulations require that the covered parties take affirmative action to employ and advance individuals in employment, without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, protected veteran status, or disability.

Ethics

Bechtel is committed to the highest standards of ethical conduct and seeks to do business only with suppliers and subcontractors who share these values. We conduct our business transactions fairly, properly, and impartially and expect the same from our suppliers and subcontractors. Any conduct that fails to meet our standard of ethics, integrity, and responsible conduct may preclude suppliers and subcontractors from being invited to participate in a solicitation. Supplier shall cooperate with any Bechtel inquiry into alleged unethical conduct and shall implement corrective measures if requested.

Human Trafficking and Anti-Slavery

Bechtel is committed to respecting all human rights everywhere we operate, consistent with Bechtel's Vision, Values & Commitments and the spirit and intent of the United Nations Guiding Principles on Business and Human Rights. To that end, Bechtel will not tolerate knowing or unknowing involvement in, allowance for, or support of slavery, servitude, or forced or compulsory labor, exploitative child labor or human trafficking in any form ("Modern Slavery"). Suppliers and subcontractors must and must cause their subsuppliers and subcontractors at every tier to adhere to all Applicable Laws relating to Modern Slavery and human rights. In addition, suppliers and subcontractors must and must cause their subsuppliers and subcontractors at every tier to:

- Employ workers at or above the applicable minimum age requirement.
- Maintain a workplace free from threats of violence, physical abuse, or other conduct that fails to respect the safety and dignity of a worker.
- Comply with applicable wage laws and, upon end of employment, pay for return transportation costs for workers recruited from outside the country.
- Not charge workers recruitment fees or utilize firms charging workers such fees and not utilize fraudulent or misleading recruitment practices.
- Not withhold a worker's passport or immigration documents.
- Provide workers a process for escalating and reporting concerns without retaliation.

Suppliers and subcontractors must ensure that their subsuppliers and subcontractors at every tier give an identical representation in their subcontracts and purchase orders for the performed work.

Suppliers and subcontractors shall maintain effective policies and due-diligence procedures designed to identify, prevent, mitigate, and remediate actual or potential adverse human-rights impacts in their operations and supply chains and shall promptly notify Bechtel if they become aware of any actual or suspected case of forced labor, exploitative child labor, or human trafficking connected to their operations or suppliers. No retaliation shall be taken or tolerated against any person who, in good faith, raises a concern or participates in an investigation relating to these issues.

Import/Export

Throughout the supply chain, our suppliers and subcontractors must comply with all applicable export and import laws and regulations, including the international sanctions programs administrated by the U.S. Department of Treasury as well as any other applicable government agency in the U.S. or abroad.

Restricted Parties

Suppliers and subcontractors must acknowledge that the U.S. Government, other country governments, and international organizations publish Restricted Parties Lists ("Lists") that identify parties (such as known or suspected terrorists, money launderers, and drug traffickers) restricted from certain or all types of transactions. Suppliers and subcontractors must review such Lists prior to initiating transactions with any subsupplier or subcontractor at any tier, including financial institutions, for all or any portion of the goods or services to ensure such lower tier subsupplier or subcontractor and any relevant owners are not identified on any applicable Lists. Subsupplier and Subcontractors shall not and shall cause its subsuppliers and subcontractors at every tier, to not enter into any transactions with any party with respect to the provision of goods or services for Bechtel, including financial institutions, identified on any applicable Lists.

Safety

Bechtel has a "Zero Accidents" policy at its construction sites. Suppliers and subcontractors must and must cause their subsuppliers and subcontractors at any tier, to comply with the site safety requirements of each Bechtel jobsite. At suppliers' facilities, suppliers must operate facilities in a safe manner to protect Bechtel personnel, its agents, and suppliers' employees at all times. In all locations, suppliers and subcontractors must provide a safe work environment in accordance with all Applicable Laws.

Supply Chain Diversity

Bechtel is committed to a diverse workforce and a diverse supply chain. Within the United States, our suppliers and subcontractors must assist Small, Disadvantaged, Women-Owned, Veteran-Owned, Service-Disabled Veteran-Owned, and HUB Zone Business concerns to obtain business opportunities by identifying and encouraging not just within their own company but also the lower-tier supplier and subcontractor companies to participate to the greatest extent possible, consistent with their qualifications, quality of work, and obligations as may be required by 48 CFR 52.219-9 (subcontracting plan regarding small business concerns). For all work regardless of location, our suppliers and subcontractors must strive to identify, source, develop, and otherwise assist local suppliers and subcontractors in performance of the work.

Sustainability

We strive to lead the engineering and construction industry in designing and constructing facilities that are environmentally sound, are socially responsible, and leave a sustainable and positive impact on the local communities. We similarly expect our suppliers and subcontractors to develop work practices to adhere to safe work practices, mitigate adverse impact to the environment, develop local suppliers and subcontractors, and advance the economics of the local community.

Lower-Tier Subsuppliers and Subcontractors Throughout the Supply Chain

In addition to the above commitment, suppliers and subcontractors must secure the same commitments set forth herein from lower tier subsuppliers and subcontractors. The above requirements are mandatory and reflect, in part, Bechtel's corporate values/ethics and social responsibility on such issues.