



Modern Slavery Act Statement

Financial Year
January 1, 2025 – December 31, 2025

1. The Reporting Companies

This Statement is made in accordance with the United Kingdom’s Modern Slavery Act 2015, Australia’s Modern Slavery Act 2018, and Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023. It covers the reporting period January 1, 2025 to December 31, 2025.

United Kingdom Modern Slavery Act 2015

The reporting “Commercial Organisations”¹ for this Statement under the United Kingdom Modern Slavery Act 2015 are:

- Bechtel Holdings Limited (“BHL”), a private company limited by shares, registered in England & Wales (company number 02613489) with its registered office at 6th Floor, Building 6, Chiswick Park, 566 Chiswick High Road, London W4 5HR, England. BHL’s board of directors approved this statement on May 26, 2026.
- Bechtel Limited (“BLTD”), a private company limited by shares, registered in England & Wales (company number 00506133) with its registered office at 6th Floor, Building 6, Chiswick Park, 566 Chiswick High Road, London W4 5HR, England. BLTD’s board of directors approved this statement on May 26, 2026.
- Bechtel Management Company Limited (“BMCL”), a private company limited by shares, registered in England & Wales (company number 04252526) with its registered office at 6th Floor, Building 6, Chiswick Park, 566 Chiswick High Road, London W4 5HR, England. BMCL’s board of directors approved this statement on May 26, 2026.
- Bechtel Nuclear Power Company Limited (“BNPC”), a private company limited by shares registered in England & Wales (company number 11089473) with its registered office at 6th Floor, Building 6, Chiswick Park, 566 Chiswick High Road, London W4 5HR, England. BNPC’s board of directors approved this statement on May 26, 2026.

Australian Modern Slavery Act 2018

The “Reporting Entities”² for this Statement under the Australian Modern Slavery Act 2018 are:

- Bechtel Australia Proprietary Limited (“BAPL”), a proprietary company registered in Australia (company number ACN 006 334 505) with its registered office at Level 2, 540 Wickham Street, Brisbane, QLD, 4006, Australia. BAPL’s board of directors approved this Statement on May 27, 2026.
- Bechtel Construction (Australia) Pty Ltd (“BCAPL”), a proprietary company registered in Australia (company number ACN 137 316 539) with its registered office at Level 2, 540 Wickham Street, Brisbane, QLD, 4006, Australia. BCAPL’s board of directors approved this Statement on May 26, 2026.
- Bechtel (Western Australia) Pty Ltd (“BWAPL”), a proprietary company registered in Australia (company number ACN 147 531 226) with its registered office at Level 12, 140 St. Georges Terrace, Perth, WA 6000, Australia. BWAPL’s board of directors approved this Statement on May 26, 2026.

¹Clause 54(1)-(3), Part 6 of the United Kingdom’s Modern Slavery Act 2015 defines a “commercial organisation” required to prepare a Modern Slavery Act statement.

²Section 5, Part 1 of the Australian Modern Slavery Act 2018 defines a “reporting entity” required to prepare a Modern Slavery Act statement.

Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023

The "Entities"³ with a Reporting Obligation under Canada's Fighting Against Forced Labour in Supply Chains Act 2023 for this Statement are:

- Bechtel Canada Co. ("BCANDCO"), a proprietary company registered in Nova Scotia, Canada (company number 3053855), with its registered office at 600-1741 Lower Water Street, Halifax, NS, B3J 0J2, Canada. BCANDCO's board of directors approved this statement on May 26, 2026.
- Northbech Co. ("NOBC"), a non-operating holding company that owns 100% of the issued and outstanding stock of BCANDCO. NOBC is a proprietary company registered in Nova Scotia, Canada (company number 3056281) with its registered office at Queen's Marque, 600-1741 Lower State Street, P.O. Box 997, Halifax, NS, B3J 2X2, Canada. NOBC's board of directors approved this statement on May 26, 2026.

This is a joint Statement made on behalf of BHL, BLTD, BMCL, BNPC, BAPL, BCAPL, BWAPL, BCANDCO and NOBC (collectively referred to herein as the "Reporting Companies") reporting on the risk of modern slavery and human trafficking in their operations and supply chains and the actions taken to address and mitigate those risks.

A table setting out how this Statement addresses the United Kingdom, Australian and Canadian legislation reporting criteria for each of the Reporting Companies, as applicable, is set forth in Appendix I.

The Reporting Companies are part of the Bechtel group of companies. Unless expressly stated otherwise herein, references to the 'Bechtel group of companies,' 'Bechtel,' 'we,' 'us' and 'our' refer to Bechtel Group, Inc. and its direct and indirect wholly owned subsidiaries. This Statement is made only on behalf of the Reporting Companies and covers only the operations, supply chains, and activities of the Reporting Companies during the reporting period. It does not cover the operations, supply chains, or activities of any other Bechtel entities, including any subsidiaries (direct or indirect) of the Reporting Companies, unless expressly stated otherwise. Information in this Statement about Bechtel or the Bechtel group of companies is included for context only.

2. Our Business

Bechtel is a leading global engineering, procurement, construction, and project management company. Differentiated by the quality of our people and our relentless drive to deliver the most successful outcomes, we seek to align our capabilities to our customers' objectives to create a lasting positive impact.

We operate through five global business units (GBUs):

- **Infrastructure**, headquartered in London, with offices in Reston, Virginia, Riyadh, KSA, and projects across the globe.
- **Nuclear, Security, & Environmental**, headquartered in Reston, Virginia, with offices in Knoxville and Oak Ridge, Tennessee, and projects in the United States and allied nations.
- **Energy**, headquartered in Houston, Texas, with projects across the globe.
- **Mining & Metals**, with offices in Brisbane and Perth, Australia; Santiago, Chile; Lima, Perú; and Denver, Colorado; with projects across the globe.
- **Manufacturing & Technology**, headquartered in Reston, Virginia, with an office in Chandler, Arizona, and Houston, Texas, with projects primarily in the United States.

³ Sections 2 and 9 of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 sets out the "Entities" required to prepare a modern slavery-related annual report.

BLTD and BMCL operated across the Energy, Mining & Metals, and Infrastructure GBUs during 2025, primarily in the United Kingdom, Albania, Serbia, and Taiwan.

BHL operates a Middle East regional headquarters in the Kingdom of Saudi Arabia through a branch establishment (Bechtel Regional Headquarters), which provides strategic and functional support to Bechtel operating subsidiaries in the region. It is not an engineering, procurement, or construction delivery entity and does not self-perform construction or directly employ craft labor. Related modern slavery and human trafficking risks therefore primarily relate to office-based employment and third-party service providers supporting office operations.

BAPL, BCAPL and BWAPL operated across the Energy, Infrastructure and Mining & Metals GBUs during 2025.

BCANDCO operated across the Energy, Mining & Metals, and Infrastructure GBUs during 2025, predominantly in Alberta, Ontario, and British Columbia, and its activities included Engineering, Procurement, Construction and Project Management and professional services. NOBC is a holding company with no operations.

The Reporting Companies align with Bechtel's Vision, Values & Commitments (VW&Cs), which inform our approach to business ethics and respect for human rights. Consistent with this approach, we are committed to promoting respect for human rights in our operations and supply chains, and we communicate these expectations to our business partners, contractors, and suppliers.

3. Risk Assessment

a. Modern Slavery and Human Trafficking Risks Within Our Operations

The risk of modern slavery and human trafficking within our operations is influenced by several interrelated factors, including: (i) the geographic locations where we operate, (ii) the scope of services we provide, (iii) how we engage our workforce, and (iv) whether we perform work directly or through partners (including joint ventures or consortia).

Geography. Our projects and related offices/sites that provide the on-the-ground day-to-day work needed to manage, design, and build our customers' complex projects are geographically dispersed, and in some cases, remote. Although some level of modern slavery and human trafficking risk can exist in any country, we consider projects located in countries with a higher prevalence of, or vulnerability to, modern slavery and human trafficking to present a higher risk than projects located in countries with stronger rule-of-law indicators and lower assessed vulnerability. As part of our analysis to understand higher-risk locations, we utilize the World Justice Project Rule of Law Index (the "WJP Rule of Law Index"), available at [WorldJusticeProject.org](https://www.worldjusticeproject.org), which assesses rule-of-law factors in 142 countries, including fundamental rights and access to justice.

In addition to project offices, we also operate from office locations that support core business functions and provide centralized support to our projects. We generally consider the risk of modern slavery and human trafficking in these office-based environments to be lower, given the nature of the work performed and the governance and employment-law frameworks in the jurisdictions where these offices are located. Notwithstanding this, we recognize that modern slavery and human trafficking risks can still arise, including through third-party service providers.

Scope of Services. We support customers at various stages of their projects and provide services ranging from feasibility studies and front-end engineering and design to project management consulting and full engineering, procurement, and construction services. The risk of modern slavery and human trafficking varies by scope and is generally influenced by factors such as (i) the extent of labor-intensive, on-the-ground work, (ii) reliance on subcontractors, labor brokers, and/or migrant labor, and (iii) the scale, complexity, and geographic reach of associated procurement and supply chains.

Study/FEED/Engineering Scopes: These scopes generally present lower risk of modern slavery and human trafficking because they typically involve highly skilled personnel performing office-based work with limited use of labor brokers, subcontracted manual labor, or on-the-ground construction activities. Notwithstanding this, risks can arise through third-party service providers or contingent labor depending on the jurisdiction and the manner in which personnel are engaged.

Construction Scopes: Construction scopes generally present higher risk of modern slavery and human trafficking due to the labor-intensive nature of construction activities and the frequent reliance on subcontractors and labor brokers. Risk may be heightened on large projects and in jurisdictions with weaker labor protections or higher assessed vulnerability. Given the demand for and limited availability of sufficient craft labor in many locations, foreign migrant labor is often utilized. Foreign migrant laborers can be particularly vulnerable due to factors such as language barriers and potential exploitation by recruitment agencies (see “Workforce Engagement,” below). In addition, large construction projects, particularly in remote or resource-constrained environments, may involve the mobilization of transient workforces. These conditions can increase the risk of third-party labor exploitation, including risks of sexual exploitation and abuse, particularly where local governance, community protections, or support services are limited.

Procurement Scopes: Projects with significant procurement scopes can present higher risk of modern slavery and human trafficking due to the scale, complexity, and geographic reach of global supply chains (see “Modern Slavery Risks Within Our Supply Chain,” below). Risk may be higher when purchasing goods and services with elevated inherent risk and/or when sourcing from countries with higher assessed vulnerability to modern slavery and human trafficking.

Partnering. Projects where we partner with third parties to perform work (including through joint ventures or consortia) may present heightened risk of modern slavery and human trafficking because we may have less direct authority, control, and visibility than when we self-perform. In these arrangements, the use of partners’ subcontractors or labor brokers, differing management practices, and varying standards across organizations and jurisdictions can increase risk.

Workforce Engagement. The use of contingent or temporary workers can present heightened risk of modern slavery and human trafficking because such workforces may include potentially vulnerable groups, including migrant workers. This risk may be further heightened when labor is sourced through third-party recruitment or staffing agencies, given the potential for deceptive recruitment practices, including charging workers fees that can result in debt bondage.

b. Modern Slavery Risks Within Our Supply Chain

Bechtel primarily purchases capital goods and/or equipment and services for construction projects. Across all of Bechtel’s business lines and in all countries in which Bechtel does business, Bechtel’s procurement and contracts group worked directly with approximately 7,200 suppliers of goods, equipment and services from 48 countries and issued ~73,000 orders with approximately USD\$15.5 billion total commitments during the 2025 financial year.⁴

Given the complexity and reach of Bechtel’s supply chain, we apply a risk-based approach to assess modern slavery and human trafficking risk. Risk is considered higher when purchasing goods, equipment, and/or services that have an elevated inherent risk of modern slavery and human trafficking (as identified by resources such as the U.S. Department of Labor’s List of Goods Produced by Child Labor or Forced Labor and the Responsible Sourcing Tool) and/or when procuring goods, equipment, and/or services from countries with higher assessed vulnerability to modern slavery and human trafficking (as informed by the WJP Rule of Law Index)). We maintain a dashboard that ranks current first-tier suppliers as having a higher or lower risk of modern slavery and human trafficking based on their countries of direct operations and the risk profile of the goods, equipment, or services they provide; however, we recognize that risks may also exist beyond first-tier suppliers depending on sub-tier sourcing and labor practices.

In 2025, Bechtel did not purchase any goods, equipment, or services from any first-tier suppliers operating in the 18 countries identified by the WJP Rule of Law Index as having the highest assessed vulnerability with respect to modern slavery and human trafficking. In addition, in 2025, a small portion of Bechtel’s commitments, based on our current classification of spend categories, were for high-risk commodities identified by the U.S. Department of Labor and the Responsible Sourcing Tool, including electronics and electronic components, solar panels, steel products, and

⁴ With respect to Canada specifically, in 2025, BCANDCO and NOBC committed total funds of USD \$29.2 million and with respect to the U.K., BLTD and BMCL committed total funds of USD \$36.7 million in goods and services to suppliers and contractors, the vast majority such spend being for professional services, construction consumables and construction services.

galvanized products. Notwithstanding these indicators, we recognize that modern slavery and human trafficking risks can exist in a range of jurisdictions and categories of spend and may be present in sub-tier supply chains.

4. Due Diligence and Management

a. Policies Against Human Trafficking and Slavery

Bechtel maintains policies, systems, and processes (including its Code of Conduct and related procedures) designed to avoid complicity in practices that constitute modern slavery and human trafficking and to support a work environment free from such practices. Bechtel's policies generally apply across the Bechtel group of companies and have been adopted by the boards of directors of each of the Reporting Companies.

b. Ethics and Compliance

Bechtel's [Code of Conduct](#), which is published in seven languages, makes clear that we are committed to ensuring there is no form of modern slavery or human trafficking in our supply chain or in any part of our business. It also makes clear that Bechtel does not tolerate the use of modern slavery or human trafficking in the performance of Bechtel contracts by our employees, suppliers, subcontractors, or business partners. The Code of Conduct instructs employees to immediately report any concern or suspicion of modern slavery or human trafficking to their supervisor, their Ethics & Compliance Officer, the Legal Department, or the [Ethics HelpLine](#). Our employees are responsible for complying with our policies and the Code of Conduct, and violations are subject to discipline, up to and including termination. Each year, all employees are required to certify that they have read and understood the Code of Conduct and the expectations contained therein.

Bechtel encourages employees, suppliers, subcontractors, and other third-party business partners to ask questions about our Code of Conduct and to report any issues, concerns, or suspicions of modern slavery or human trafficking. We have an Ethics HelpLine available as a confidential resource on the internet at HelpLine.Bechtel.com, by email at ethics@bechtel.com, or by phone at 1-800-BECHTEL (1-800-232-4835) from the United States and Canada, 0808-206-1009 from the United Kingdom, and 1-800-316-704 from Australia. The Ethics HelpLine allows anonymity. We do not tolerate threats or acts of retaliation against anyone for raising legitimate concerns, and we are committed to addressing each concern in a prompt and responsible manner. Our Ethics & Compliance team is responsible for assessing and responding to issues reported to Ethics & Compliance through the Ethics HelpLine or otherwise, including issues related to modern slavery and human trafficking.

c. Training and Awareness

Our online and instructor-led course entitled "Modern Slavery Awareness" is available to all Bechtel employees in English and Spanish. It focuses on how to identify the warning signs of modern slavery and human trafficking and how to manage it, and it incorporates assessments requiring the application of knowledge to potential real-world scenarios. The course is mandatory for employees who, due to the nature of their work, function, or location, may be more likely to encounter signs of modern slavery or human trafficking. A workshop format, designed with the flexibility to address local issues and risks and share best practices on how to manage them, is also available to project management teams on sites where modern slavery and human trafficking may be higher risk. In 2025, across Bechtel, 6,988 employees completed the course.

Separately, all Bechtel employees must participate in our annual ethics and compliance workshop. This training is led by management and includes the evaluation of multiple real-life ethical dilemmas. This year's workshop included a specific example involving human trafficking. Participation for employees required to take the Modern Slavery Awareness course and for all employees with respect to the annual ethics and compliance training is monitored and enforced by supervisors and Bechtel management.

d. Upfront Risk Assessment and Mitigation Planning

Bechtel policy provides for an upfront risk assessment before a commitment is made to a customer's project. This process assesses the obligations undertaken and risks assumed in the proposed commitment to support an informed

decision by the appropriate approval authority. The upfront risk assessment may consider a range of factors, which may include, as applicable, sustainability-related risks (including risks to the environment, safety, and the well-being of the people and communities who may be affected by our projects) and customer- and project-related risks, including reputational risk considerations. This upfront risk assessment supports early and proactive risk mitigation planning and actions.

e. Foreign Migrant Workers

The nature of large engineering and construction projects can involve the use of foreign migrant workers, which can increase modern slavery and human trafficking risk, particularly where third-party recruiters, labor brokers, and subcontractors are used. These risks may be heightened in circumstances where Bechtel does not have direct control over recruitment and employment processes. Bechtel's Guiding Principles on the Recruitment and Employment of Foreign Migrant Workers ("Guiding Principles") set expectations intended to support ethical recruitment and employment practices and to address related modern slavery and human trafficking risks. The Guiding Principles provide that:

- Relevant policies and procedures should treat migrant workers fairly and without any form of discrimination.
- Contract terms and conditions should be written and communicated in a manner that is understood by migrant workers, and employment should be with a recognized and authorized employer in the country of work.
- No recruitment or placement fees should be collected from migrant workers.
- National passports, identity, and residency documents should be freely accessible by migrant workers.
- Wages should be paid regularly and directly to migrant workers per contract terms.
- Freedom to join worker associations and bargain collectively should be available to migrant workers.
- Migrant workers should be provided with humane, safe, and secure working conditions, accommodation, and transportation between the work site and living quarters.
- Migrant workers should not be subjected to any form of intimidation or inhumane treatment, including in disciplinary matters.
- Access to legitimate grievance mechanisms and resolution processes should be provided to migrant workers without fear of retaliation or dismissal.
- Upon completion of work, or under special circumstances, as per contract terms, migrant workers should be able to return to their home country or seek other employment in the country of work, without restrictions.

Where Bechtel has responsibility or leverage over recruitment and employment processes, we seek to promote these expectations through contractual commitments and oversight practices appropriate to the circumstances of the project and applicable law.

In 2025, none of the Reporting Companies engaged foreign migrant workers (e.g., recruited labor engaged through labor brokers). The Reporting Companies may, however, temporarily assign ("second") employees from other Bechtel affiliates to support projects, where permitted, including under applicable work authorization/visa requirements.

f. Supply Chain

Bechtel manages modern slavery and human trafficking risks in our supply chain by establishing clear expectations with our supply chain partners (including through [Bechtel's Supplier & Subcontractor Expectations](#)), conducting due diligence reviews of suppliers in a manner commensurate with risk, obtaining their commitment to Bechtel's Code of Conduct, incorporating terms and conditions relating to modern slavery and human trafficking in awarded contracts, and conducting in-shop and/or third-party monitoring of suppliers during performance to identify potential issues. Bechtel's Supplier & Subcontractor Expectations also include other responsible sourcing requirements (for example, relating to conflict minerals and associated supplier due diligence).

Setting Clear Expectations

As part of the qualification and proposal and prior to award, we require suppliers and subcontractors to commit to Bechtel's Supplier & Subcontractor Expectations (as updated in 2025), as a condition of eligibility for award and a

continuing obligation throughout performance, which in addition to stating that Bechtel does not tolerate the use of slavery, servitude, forced or compulsory labor, or human trafficking, require suppliers and subcontractors to:

- Employ workers 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 the worker.
- Comply with applicable wage laws and, upon the end of employment, pay 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 with a process for escalating and reporting concerns without retaliation.
- 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.
- 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.
- Contractually require their suppliers to conform to the same standards.

Identifying, Selecting, and Contracting with Suppliers

Suppliers are generally selected on a project-by-project basis by our Supply Chain function, in collaboration with the project team, making supplier selection and supplier diligence an ongoing dynamic process. Proposed suppliers go through (i) a restricted parties list review that vets the suppliers across 40 different databases, and (ii) a review of our internal warnings and advisories, which identify concerns raised in the performance of prior work with Bechtel. We also use a third-party supply chain risk management tool that provides supplier risk scoring, including an overall risk indicator that incorporates a range of external risk factors and risk indicators. In 2025, we expanded our use of this tool to support supplier selection and pre-award due diligence in addition to ongoing monitoring during performance. Buyers can see supplier risk scoring when developing bidders lists for addition to a bid request, and risk scoring supports ongoing monitoring through alerts and reporting as the procurement process progresses. While our use of these tools is primarily focused on first-tier suppliers, the tool also supports further investigation of sub-tier supply chain risk indicators.

Depending on various commercial factors, the Reporting Companies may also engage Bechtel joint venture partners to supply materials and/or services. In 2025, Bechtel updated its standard vendor agreements and related contracting guidelines to further align with Bechtel's Supplier & Subcontractor Expectations and to strengthen contractual provisions addressing modern slavery and human trafficking. Once a supplier or subcontractor has been vetted and selected, Bechtel requires, through its standard contract provisions (or equivalent terms), that modern slavery or human trafficking not be used in the supplier's or subcontractor's business or by any suppliers or subcontractors in its supply chain. Our suppliers and subcontractors also agree to comply with all applicable local and national laws and regulations, and Bechtel has the right to terminate contracts that breach these requirements.

Our standard terms and conditions also provide that, at the project site, all suppliers and subcontractors must comply with Bechtel's rigorous safety and health plan. This plan includes Bechtel's core processes for safety and health to ensure that all workers—both Bechtel's and its supply chain's—adhere to our zero-incident values.

Assessing Effectiveness by Managing and Monitoring Supplier Relationships and Performance

In addition to upfront vetting and contract requirements, Bechtel manages and monitors its supplier relationships and supplier performance. Bechtel Supplier Quality & Expediting's (BSQE's) primary function is to communicate with and visit supplier facilities, reinforcing our proactive approach to resolving potential issues, which helps suppliers deliver consistent value in a timely manner. To verify compliance with purchase order requirements and specifications, supplier quality surveillance is performed in accordance with approved quality surveillance plans.

Our quality surveillance checklist and reporting for our suppliers' facilities includes a Sustainability Section requiring the assessor to identify and report any signs of underage workers, involuntary labor, or worker abuse and to identify any indications of worker restrictions that might prevent the reporting of grievances or concerns. If any issue is flagged by the assessor, it goes directly to the project representative and Bechtel management for review and follow-up. All records are kept in our supplier quality database. In consultation with Bechtel management, projects may engage a third-party provider to conduct a workplace conditions assessment or investigate if a positive flag is identified during a Bechtel surveillance assignment.

Along with supplier quality surveillance, we annually identify our key suppliers based on spending and the provision of critical equipment or services, as well as conduct a desktop review of a select group of their policies and approaches to many areas of sustainability, including modern slavery and human trafficking. In 2025, Supply Chain incorporated a third-party supply chain risk management tool that includes modern slavery and human trafficking among other elements, and that supports ongoing supplier monitoring through risk scoring and alerts.

Failure of a supplier to cure any identified deficiencies may result in a supplier advisory being issued within Bechtel's Supply Chain system, which remains in place until the deficiencies are rectified. Where we have higher risk suppliers, e.g., in countries without strong labor laws or with identified modern slavery or human trafficking issues, we have a process for engaging a third-party entity to conduct a review of the supplier's facility. When we find corrective actions are needed, we will brief the supplier and conduct a follow-up review of the corrective actions taken.

g. Assessing Effectiveness by Audit and/or Adoption of Compliance Plans

Audit and compliance plans are important tools in ensuring that corporate policies and procedures regarding modern slavery and human trafficking are being implemented and cascaded throughout Bechtel and that contract provisions relating to the same are being complied with.



Corporate Internal Audit

Bechtel's Internal Audit function provides an independent evaluation of internal controls over: (i) compliance with policies and procedures; (ii) the reliability and integrity of information provided to management; and (iii) processes that safeguard Bechtel's assets. With respect to modern slavery and human trafficking, Bechtel's Internal Audit function verifies that modern slavery and human trafficking terms and conditions are incorporated in project pro forma contracts and in purchase orders and subcontracts (on a sample basis) for those projects included in the Internal Audit Annual Audit Plan. In addition, when project payroll is audited, Internal Audit monitors whether hours worked by project personnel are potentially at risk of violating local labor laws. Internal Audit identifies projects for inclusion in its annual audit plan through an assessment of risk attributes of active projects. The risk attributes that overlap with modern slavery and human trafficking risks are the country of execution and the procurement and construction scopes of work. Bechtel entities and projects are audited based on risk; not all are audited annually.

Project Self-Assessments and Audits of Suppliers

We continued to deploy a self-assessment tool as part of our implementation of the Building Responsibly Guidance Notes on Worker Welfare. This questionnaire is completed collaboratively via onsite visits with the project teams. It has also been included in the Mental Health Planning toolkit for project managers with the idea that projects effectively implementing the Building Responsibly Guidance Notes on Worker Welfare are less likely to experience mental health and safety issues across the workforce.

Based on our risk assessment of suppliers, we undertake independent audits of certain suppliers that have been identified as potentially higher risk for modern slavery or human trafficking. They are subject to additional monitoring activity, which may include third-party audits, including audits initiated based on Bechtel's risk assessments and, in some cases, at customer request. Where an audit, assessment, or other monitoring activity identifies potential issues, Bechtel seeks timely corrective action, which may include the supplier developing and implementing a corrective action plan and providing updates on progress. Depending on the circumstances, Bechtel may conduct or request follow-up

verification and may apply contractual remedies where available, up to and including termination. Our approach is risk-based and pragmatic and does not involve auditing all suppliers or all tiers of the supply chain.

i. Steps Taken During 2025 To Prevent or Reduce the Risk of Forced Labor and Child Labor

As described more fully in the above sections, the following are some of the steps taken by Bechtel during the 2025 financial year to prevent or reduce the risk of forced labor and child labor:

- Maintained policies, trainings, systems, and processes aimed at detecting and preventing modern slavery and human trafficking and avoiding complicity in any practice that constitutes modern slavery or human trafficking.
- Required that employees immediately report any concerns about any issue or suspicion of modern slavery or human trafficking.
- Made clear in our policies and contracts that we are committed to ensuring that there is no form of modern slavery (including forced labor or child labor) or human trafficking in our supply chain or in any part of our business. This includes within the performance of Bechtel contracts by our employees, contractors, business partners, or suppliers.
- Promoted the use of and specified the purpose of the Ethics Helpline, available in Australia, Canada, and the United Kingdom, by internet, email, and phone.
- Conducted appropriate upfront risk assessments, including identifying sustainability risks, which include risks to the safety and well-being of the people and communities who may be affected by our projects.
- Conducted due diligence before entering into project-specific or multi-project joint associations to ensure that the proposed third-party associate has ethical standards and modern slavery and human trafficking policies and procedures compatible with our own.
- Made available to all Bechtel employees, including those in Australia, Canada, and the United Kingdom, our online (with an option of instructor-led) course entitled "Modern Slavery Awareness."
- Incorporated a third-party supply chain risk management tool that includes modern slavery and human trafficking among other elements.
- Strengthened Bechtel's Supplier & Subcontractor Expectations and our standard forms of contract and related contracting guidelines to further reflect expectations regarding modern slavery and human trafficking.

h. Remediation

During the 2025 reporting period, the Reporting Companies did not identify any instances of modern slavery (including forced labor and child labor) or human trafficking in their operations or supply chain. As a result, there is nothing to report with respect to measures taken by the Reporting Companies to remediate (i) instances of any forced labor or child labor, or (ii) the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labor or child labor in their activities and supply chains.

5. Industry Engagement

We understand the importance of engaging and collaborating with the broader engineering and construction industry to promote best practices and elevate standards to prevent modern slavery and human trafficking. Bechtel was one of the founding members of [Building Responsibly](#), a group of engineering and construction companies working together to raise the bar in promoting the welfare of workers across the industry.

Bechtel works with other members to identify additional implementation tools such as effectiveness assessments for site-specific project grievance mechanisms. Bechtel has also included the Worker Welfare Self-Assessment Tool as a resource for developing Project Mental Health Plans.

In 2025, Building Responsibly continued to facilitate peer learning opportunities for companies to share their implementation successes and challenge areas as well as engage with others in the field, offering training and technology options to engage workers. One special project that we participated in was drafting a paper outlining roles, drivers and opportunities for various stakeholders in the Built Environment Value Chain, which will be the subject of industry consultation during 2026.

Bechtel also served as co-chair of the [Corporate Responsibility and Labor Policy Committee of the U.S. Council for International Business](#), an association of 300 U.S. multinational companies. The committee promotes policies and practices to international standard-setting bodies to strengthen governments' responsibilities to develop and enforce legislation and regulation to prevent modern slavery and engage companies to share their experiences and best practices.

Bechtel Global Logistics (BGL), a discipline focusing on delivery of materials and equipment, works to raise awareness of human trafficking within the transportation industry and across multiple modes of transportation (e.g., ports, roads, etc.) by sponsoring regular discussions on the subject with the U.S. Exporters Competitive Maritime Council and various industry conferences, as well as encouraging BGL's logistics service providers to share information, lessons learned, and methods they are employing to reduce the risk of human trafficking in the transportation and logistics industry.

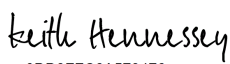
We will continue to engage with diverse organisations to help advance a safer, healthier environment for all workers in the engineering and construction sector and other industries.

6. Process of Consultation

Because employees, officers, GBU managers, and several functional groups (e.g., Contracts & Procurement, Human Resources and Global Workforce Services, Ethics & Compliance, Sustainability) are responsible for applying Bechtel's policies against modern slavery and human trafficking, we established a cross-GBU and cross-functional group, the Taskforce on Human Trafficking and Modern Slavery (the "Taskforce"). Through this Taskforce, we share updates, ideas, and practices relating to modern slavery and human trafficking across Bechtel and support the development of goals and the implementation of relevant policies, principles, processes, and legislation. This Taskforce includes representatives of the five GBUs and representatives located in, or with responsibility over, the key regions in which Bechtel operates, including Australia, Canada, and the United Kingdom.

This statement was prepared in consultation with the Taskforce, the Corporate Manager of Sustainability, the Corporate Legal Department, the Heads of Legal for each of the relevant GBUs, and with select members of the Boards of BHL, BLTD, BMCL, BNPC, BAPL, BCAPL, BWAPL, BCANDCO, and NOBC prior to review and approval by each of those Boards.

For and on behalf of Bechtel Holdings Limited:

DocuSigned by:

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Keith B. Hennessey, Director

For and on behalf of Bechtel Limited:

Signed by:

Steven Kay

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Steven C. Kay, Director

For and on behalf of Bechtel Management Company Limited:

Signed by:

Steven Kay

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Steven C. Kay, Director

For and on behalf of Bechtel Nuclear Power Company Limited:

Signed by:

Teresa Frazier

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Teresa M. Frazier, Director

For and on behalf of Bechtel Australia Proprietary Limited:

Signed by:

Nicholas Robertson

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Nicholas E. Robertson, Director

For and on behalf of Bechtel Construction (Australia) Pty Ltd:

Signed by:

Nicholas Robertson

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Nicholas E. Robertson, Director

For and on behalf of Bechtel (Western Australia) Pty Ltd:

Signed by:

Nicholas Robertson

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Nicholas E. Robertson, Director

This Report was approved pursuant to subparagraph 11(4)(b)(i) of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 by the boards of directors of BCANDCO and NOBC.

In accordance with the requirements of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023, and in particular section 11 thereof, I attest that I have reviewed the information contained in this report for the entity specified below. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects, for the purposes of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023, for the financial year January 1, 2025 – December 31, 2025.

I make the above attestation in my capacity as a director of the board of directors of Bechtel Canada Co. (the "**BCANDCO Board**") for and on behalf of the BCANDCO Board.

I have the authority to bind Bechtel Canada Co.

Signed by:

Per: _____
Full Name: Martyn N. Daw
Title: Director and Chair
Date: 5/26/2026

I make the above attestation in my capacity as a director of the board of directors of Northbech Co. (the "**NOBC Board**") for and on behalf of the NOBC Board.

I have the authority to bind Northbech Co.

Signed by:

Per: _____
Full Name: Martyn N. Daw
Title: Director
Date: 5/26/2026

Appendix I: Content Cross-Referenced to MSA Reporting Criteria

U.K. Modern Slavery Act 2015, Section 54(5)'s Recommended Reporting Criteria	Australia Modern Slavery Act 2018, Section 16(1)'s Mandatory Reporting Criteria	Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023, Section 7(1) and (2) Reporting Criteria	Sections Addressing Criteria
<ul style="list-style-type: none"> ➤ The organization's structure, its businesses, and its supply chains 	<ul style="list-style-type: none"> ➤ Identify the reporting entity ➤ Describe the structure, operations, and supply chains of the reporting entity ➤ Describe the process of consultation with (i) any entities that the reporting entity owns or controls and, (ii) for joint modern slavery statements, the entity giving the statement 	<ul style="list-style-type: none"> ➤ The entity's structure, activities and supply chains 	<ul style="list-style-type: none"> ➤ The Reporting Companies ➤ Our Business ➤ Risk Assessment ➤ Due Diligence and Management ➤ Process of Consultation
<ul style="list-style-type: none"> ➤ Its policies in relation to slavery and human trafficking 	<ul style="list-style-type: none"> ➤ Not a standalone mandatory criterion under s.16(1); addressed as part of actions taken to assess and address modern slavery risks (including due diligence and remediation processes) 	<ul style="list-style-type: none"> ➤ Its policies in relation to forced labor and child labor 	<ul style="list-style-type: none"> ➤ Policies Against Human Trafficking and Slavery ➤ Ethics and Compliance
<ul style="list-style-type: none"> ➤ Its due diligence processes in relation to slavery and human trafficking in its businesses and supply chains ➤ The parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk 	<ul style="list-style-type: none"> ➤ Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls ➤ Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence 	<ul style="list-style-type: none"> ➤ Its due diligence processes in relation to forced labor and child labor ➤ The parts of its business and supply chains that carry a risk of forced labor or child labor being used and the steps it has taken to assess and manage that risk 	<ul style="list-style-type: none"> ➤ Risk Assessment ➤ Due Diligence and Management (and subsections) ➤ Upfront Risk Assessment and Mitigation Planning ➤ Supply Chain

Modern Slavery Act Statement

	and remediation processes		
<ul style="list-style-type: none"> ➤ Its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate 	<ul style="list-style-type: none"> ➤ Describe how the reporting entity assesses the effectiveness of such actions 	<ul style="list-style-type: none"> ➤ How the entity assesses its effectiveness in ensuring that forced labor and child labor are not being used in its business and supply chains. ➤ The steps the entity has taken during that year to prevent and reduce the risk that forced labor or child labor is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity 	<ul style="list-style-type: none"> ➤ Foreign Migrant Workers ➤ Assessing Effectiveness by Audit and/or Adoption of Compliance Plans (and subsections) ➤ Steps Taken During 2025 To Prevent or Reduce the Risk of Forced Labor and Child Labor
<ul style="list-style-type: none"> ➤ The training about slavery and human trafficking available to its staff 	<ul style="list-style-type: none"> ➤ Not a standalone mandatory criterion under s.16(1); training is addressed under actions taken to assess and address modern slavery risks 	<ul style="list-style-type: none"> ➤ The training provided to employees on forced labor and child labor 	<ul style="list-style-type: none"> ➤ Training & Awareness
<ul style="list-style-type: none"> ➤ The action taken to address slavery and human trafficking 	<ul style="list-style-type: none"> ➤ Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address modern slavery risks, including remediation processes 	<ul style="list-style-type: none"> ➤ Any measures taken to remediate any forced labor or child labor ➤ Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labor or child labor in its activities and supply chain 	<ul style="list-style-type: none"> ➤ Remediation
<ul style="list-style-type: none"> ➤ Not a standalone recommended criterion under the U.K. Modern Slavery Act 2015; additional relevant information may be included in the Statement as appropriate. 	<ul style="list-style-type: none"> ➤ Include any other information that the reporting entity, or the entity giving the statement, considers relevant. 	<ul style="list-style-type: none"> ➤ Not a standalone reporting criterion under Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 (s.7); relevant information is addressed through the required criteria above. 	<ul style="list-style-type: none"> ➤ Industry Engagement

1. The Reporting Companies

This Statement is made in accordance with the United Kingdom’s Modern Slavery Act 2015, Australia’s Modern Slavery Act 2018, and Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023. It covers the reporting period January 1, 2025 to December 31, 2025.

United Kingdom Modern Slavery Act 2015

The reporting “Commercial Organisations”¹ for this Statement under the United Kingdom Modern Slavery Act 2015 are:

- Bechtel Holdings Limited (“BHL”), a private company limited by shares, registered in England & Wales (company number 02613489) with its registered office at 6th Floor, Building 6, Chiswick Park, 566 Chiswick High Road, London W4 5HR, England. BHL’s board of directors approved this statement on May 26, 2026.
- Bechtel Limited (“BLTD”), a private company limited by shares, registered in England & Wales (company number 00506133) with its registered office at 6th Floor, Building 6, Chiswick Park, 566 Chiswick High Road, London W4 5HR, England. BLTD’s board of directors approved this statement on May 26, 2026.
- Bechtel Management Company Limited (“BMCL”), a private company limited by shares, registered in England & Wales (company number 04252526) with its registered office at 6th Floor, Building 6, Chiswick Park, 566 Chiswick High Road, London W4 5HR, England. BMCL’s board of directors approved this statement on May 26, 2026.
- Bechtel Nuclear Power Company Limited (“BNPC”), a private company limited by shares registered in England & Wales (company number 11089473) with its registered office at 6th Floor, Building 6, Chiswick Park, 566 Chiswick High Road, London W4 5HR, England. BNPC’s board of directors approved this statement on May 26, 2026.

Australian Modern Slavery Act 2018

The “Reporting Entities”² for this Statement under the Australian Modern Slavery Act 2018 are:

- Bechtel Australia Proprietary Limited (“BAPL”), a proprietary company registered in Australia (company number ACN 006 334 505) with its registered office at Level 2, 540 Wickham Street, Brisbane, QLD, 4006, Australia. BAPL’s board of directors approved this Statement on May 27, 2026.
- Bechtel Construction (Australia) Pty Ltd (“BCAPL”), a proprietary company registered in Australia (company number ACN 137 316 539) with its registered office at Level 2, 540 Wickham Street, Brisbane, QLD, 4006, Australia. BCAPL’s board of directors approved this Statement on May 26, 2026.
- Bechtel (Western Australia) Pty Ltd (“BWAPL”), a proprietary company registered in Australia (company number ACN 147 531 226) with its registered office at Level 12, 140 St. Georges Terrace, Perth, WA 6000, Australia. BWAPL’s board of directors approved this Statement on May 26, 2026.

¹Clause 54(1)-(3), Part 6 of the United Kingdom’s Modern Slavery Act 2015 defines a “commercial organisation” required to prepare a Modern Slavery Act statement.

²Section 5, Part 1 of the Australian Modern Slavery Act 2018 defines a “reporting entity” required to prepare a Modern Slavery Act statement.