

# Getting things right.

trust,  
integrity,  
honesty,  
courage,  
respect,  
transparency,  
accountability

## FLUOR'S BUSINESS CONDUCT AND ETHICS EXPECTATIONS FOR SUPPLIERS AND CONTRACTORS

Fluor has always had an absolute determination to do the right thing. In all of its dealings, Fluor is committed to unyielding integrity and the highest standard of business conduct. This commitment is integral to Fluor's continued success, and we believe it positively impacts our diverse and worldwide suppliers, contractors, customers, employees, and investors, and the communities where we do business.

All of our suppliers and contractors are expected to do what is necessary to understand and comply with these expectations and, in turn, require their suppliers and subcontractors to conform as well. Our mutual success and continuing business relationships depend on it. Fluor reserves the right to verify that a supplier or contractor's business operations meet these expectations. Failure to

act in a manner consistent with these expectations may impede our ability to do business together in the future.

Fluor expects our suppliers and contractors to maintain and enforce policies requiring adherence to lawful business practices that encompass our expectations, as appropriate. These expectations may occasionally be updated or amended. The most current version is available at [http://www.fluor.com/sustainability/ethics\\_compliance](http://www.fluor.com/sustainability/ethics_compliance). For questions, comments, or training support about our expectations, please contact your Fluor representative or Fluor's Chief Procurement Officer at [procurement@fluor.com](mailto:procurement@fluor.com). Also, suppliers and contractors can see how Fluor defines these expectations for our employees in our Code of Business Conduct and Ethics, available at [http://www.fluor.com/sustainability/ethics\\_compliance](http://www.fluor.com/sustainability/ethics_compliance).

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## Health, Safety, and Environmental (HSE)

The health and safety of our employees and all personnel associated with our work is our highest priority. Our suppliers and contractors are expected to:

- provide a safe and healthy work environment that supports accident prevention, minimizes exposure to health risks, is in compliance with applicable workers health and safety laws, and minimizes harmful impacts to the surrounding community;
- apply safe work practices (including regulatory and contract-specific requirements) to all their activities and instill safety in every aspect of their work processes and in the attitude and behavior of all their workers; and
- conduct their operations in an environmentally responsible manner and in accordance with applicable environmental laws.

## Human Rights and Employment Practices

The welfare of the workers of our suppliers and contractors is critical to Fluor successfully performing our work. Our suppliers and contractors are expected to:

- support and respect human rights and avoid complicity in human rights abuses;
- perform work without the use of forced, compulsory, bonded, or indentured labor;
- never use misleading or fraudulent practices during the recruitment of employees or offering of employment;
- treat all their workers with dignity, respect, and fairness; and
- conduct all their operations in a socially responsible, non-discriminatory manner and in accordance with applicable laws including those associated with equal opportunity, child labor, forced or compulsory labor, working hours, wages and benefits, freedom of association, data privacy, and harassment-free work environment.

## Financial and Operation Controls

Our suppliers and contractors are expected to:

- keep accurate, complete, fair, timely, transparent, and understandable financial and operational books, records, and accounts, and a system of effective internal controls;



- create, retain, and dispose of business records in accordance with applicable legal and contractual requirements;
- keep accurate and complete records prepared for Fluor, including records of work time and expenses;
- never share nonpublic information relating to Fluor; and
- comply with insider trading laws including the prohibition against buying or selling securities or advising (e.g., tipping) others to buy or sell securities while aware of material, nonpublic information relating to Fluor.

## Conflicts of Interest, Gifts, Entertainment, and Business Courtesies

Our suppliers and contractors, their employees, and their family members must not receive improper benefits through their relationship with Fluor or allow other activities to conflict with acting in the best interests of Fluor. Our suppliers and contractors are expected to:

- limit promotional items or entertainment involving our employees to common business courtesies, within accepted business practices and never with the intent to improperly influence a business decision or create a potential conflict of interest or the appearance of impropriety; and
- disclose any potential conflict of interest to Fluor for review prior to entering into any business transaction.

## Improper Payments

Fluor maintains zero tolerance for bribery and expects our suppliers and contractors to do the same. Bribery is directly or indirectly giving or promising to give anything of value to improperly influence actions of a third party. Bribes may include money, gifts, travel expenses, hospitality, vacations, expenses, below-market loans or products, reciprocal favors, political or charitable contributions, or any direct or indirect benefit or consideration.

## Trade Controls

Our suppliers and contractors are expected to:

- know and comply with the export controls, economic sanctions, and anti-boycott laws applicable to their work with and for Fluor;
- never participate in boycotts or other restrictive trade practices prohibited or penalized under United States or applicable local laws; and
- disclose to Fluor any apparent conflict between U.S. and applicable local law requirements, such as the laws blocking certain U.S. restrictions adopted by Canada, Mexico, and the members of the European Union.

## Money Laundering Prevention

Our suppliers and contractors are expected to follow applicable laws that prohibit money laundering and require the reporting of cash and other suspicious transactions.

## Company Resources

Fluor resources include property, assets, intellectual property, and confidential information. Our suppliers and contractors are expected to:

- safeguard Fluor resources utilized in the course of performing work, to use such resources solely for legitimate business purposes to advance the interest of Fluor;
- honor the intellectual property rights of Fluor and the third parties at all times; and

- maintain, handle, and, if applicable, process any confidential information internally and on a need-to-know basis only, with utmost care and in accordance with applicable law.

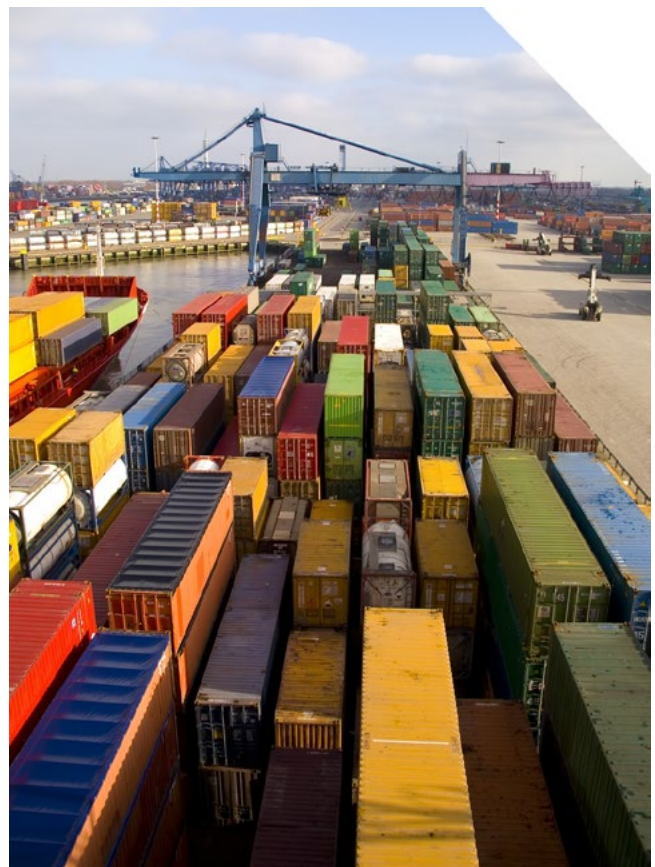
## Competing Fairly

Fluor believes in the free market system where merit, quality, price, and other objective factors determine who succeeds and who fails. Our suppliers and contractors are expected to:

- compete honestly and fairly;
- comply with applicable antitrust and competition laws; and
- never participate in anti-competitive practices such as price fixing or bid rigging.

## Government Work

Our suppliers and contractors who work on projects where government entities or agencies are involved are expected to follow any special rules that apply.



## Reporting Concerns

Our suppliers, contractors, and their employees should promptly report any business conduct and ethics concern involving or affecting Fluor, whether or not the concern involves the supplier or contractor, by contacting one of the following:

- (1) their Fluor representative;
- (2) Fluor's Chief Procurement Officer at [procurement@fluor.com](mailto:procurement@fluor.com) or 1-281-263-1000;
- (3) the Fluor Compliance and Ethics Hotline by telephone at +1-704-540-2248, or at one of the following toll-free numbers:

Australia	1-800-850-107
Canada	1-800-223-1544
Chile	1230-020-5417
China Unicom	10-800-711-0833
China Telecom South	10-800-110-0780
Colombia	01800-012-9649
India	000-800-100-1329
Mexico	001-888-818-9370
Netherlands	0800-022-0781
Philippines	1-800-1-111-0137
Poland	0-0-800-111-1756
Saudi Arabia	800-844-6984
South Africa	0800-980-651
Spain	900-98-1171
United Arab Emirates	8000-441-6990
United Kingdom	0808-234-4002
United States of America	1-800-223-1544; or

- (4) via the Internet at [www.fluorhotline.com](http://www.fluorhotline.com).

The Fluor Compliance and Ethics Hotline is a way for Fluor employees, suppliers, contractors, and others to report activities that may involve illegal or unethical conduct or violations of these expectations or Fluor's Code of Business Conduct and Ethics. A supplier or contractor may also be requested to take such steps as Fluor may reasonably request to assist Fluor in the investigation of any ethics concern involving Fluor and the supplier or contractor. Fluor policy prohibits retaliation against any person reporting an ethics concern. Contact the Fluor Compliance and Ethics Hotline if you feel retaliated against because you reported an ethics concern.

**FLUOR**®

Speak up and  
make misconduct  
disappear.

unethical  
unethical  
unethical  
unethical  
unethical  
unethical  
unethical  
unethical  
unethical  
unethical

Report unethical activity.  
It's the right thing to do.

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BRHQ056009 (Rev. Dec 2016)  
AV20170009