

Fluor Code of Business Conduct and Ethics

Summary for TRS Staffing Solutions



FLUOR[®]

This summary describes the parts of the Code of Business Conduct and Ethics that apply most directly to your job working as an employee or contractor for TRS, one of its subsidiaries, or its clients. We have highlighted what you can expect from your management and what the company expects from you to help fulfill the requirements outlined in the Code of Conduct. In case you have questions regarding the Code of Conduct, we have included a detailed section describing how and where to get help, and what to do if you have concerns. You also may review a copy of Fluor’s complete Code of Conduct on-line at <http://hr.fdnet.com> or by asking your TRS Human Resources or your TRS Branch Manager for a copy. You are responsible for understanding the entire Code of Conduct and complying with its requirements.

Safe and Secure Workplaces

What You Can Expect from Fluor and its Subsidiaries

We believe that providing a safe and secure work environment gives us a competitive advantage in attracting the best applicants, retaining our valuable workforce and winning and keeping clients. Your health and safety at the workplace is our highest priority. We will provide you with safety information, which may include safety handbooks and training appropriate to your job. In addition, the company will provide you with equipment and materials that meet legally required safety standards.

What the Company Expects from You

You are responsible for following safety and security policies and regulations and for helping make the workplace safe for everyone. If you are at all uncertain about the safety rules, have concerns about the materials or the equipment you work with, or are aware of a violation of a safety policy, contact your HSE Manager.

Workplace violence, threats, harassment, threatening remarks or gestures, or other disruptive behavior is prohibited.

Equal Employment Opportunity and Harrassment-Free Work Environment

What You Can Expect from Fluor and its Subsidiaries

Employment decisions such as hiring, promotion, discipline, and termination will not be based on a person’s gender, race, color, religion, national origin, marital status, pregnancy, age, disability, or any other legally protected status (for example, affiliations, associations, beliefs or sexual orientation, or veteran status where applicable). We strive to create a work environment that is free from

harassment, where employees and contractors can work in a safe and professional atmosphere, where merit and competence are vital, and diversity and trust are promoted.

What the Company Expects from You

As you would like to be treated with dignity and respect, we expect you to treat all employees and contractors equally and fairly as well. Discriminatory or offensive gestures, jokes, slurs or other remarks or forms of harassment that create an offensive work environment will not be tolerated.



Protecting Confidential Employee and Contractor Information

What You Can Expect from Fluor and its Subsidiaries

The Company often needs to collect, for legitimate business purposes, certain sensitive information about you, such as your hourly rate, home address, social security or social insurance number, if applicable, and other personal data. The company limits access to this information to those employees and contractors who have a business need to use it, such as Human Resources and Payroll. We also comply with all applicable privacy laws.

What the Company Expects from You

If you are authorized to have access to sensitive information about your fellow employees or contractors as part of your job responsibilities, you are expected to keep all information absolutely confidential and not share it with others.



Conflicts of Interest

What You Can Expect from Fluor and its Subsidiaries

We all have activities outside our jobs. A “conflict of interest” may arise when your personal, social, financial or political activities have the potential of interfering with your loyalty and objectivity to the company. The company has put in place guidelines to help you determine whether any of your activities may create a conflict of interest, some of which are discussed below.

What the Company Expects from You

You are expected to avoid actual conflicts of interest or activities and those that may appear to be a conflict of interest, and therefore could be harmful to the company and to us all. Conflicts of interest can take many forms, including the following examples:

- Having a second job with a competitor, customer or supplier of Fluor or one of its subsidiaries
- Using company property or materials, contacts or other resources to start or support your own business
- Having a close relative who works for Fluor or one of its subsidiaries and reports (directly or indirectly) to you

If you feel you may have a conflict of interest, you must talk to your supervisor or your site Human Resources representative for clarification.

Company Information and Resources

What You Can Expect from Fluor and its Subsidiaries

Fluor will provide you with the information you need to do your job well. If you learn about confidential company information, do not disclose this information.

What the Company Expects from You

In order to do your job correctly, we expect you to know and follow the policies that apply to your particular job. For example:

Accurate Books and Records: You must record and provide all information, including hours worked in an accurate, truthful, complete and timely manner.

Company Property, Materials, Computers and E-mail: We expect you to protect company resources and property. Company resources, such as computers, materials and equipment, should be used only for business purposes. Never use company equipment or facilities for chain letters, advertisements or solicitations. Never send e-mail or visit internet sites that might be considered offensive, defamatory, harassing, obscene or vulgar.

Protecting Company Information: As you expect us to respect confidential information about you, we expect you to secure confidential information about the company. Information regarding project scope changes or business plans and records, for example, is confidential. You should not disclose this information to anyone outside the company. Some information, such as confidential employee information, may only be shared on a need-to-know basis. Ask your supervisor, if you have any questions.



Anti-Bribery and Corruption

What You Can Expect from Fluor and its Subsidiaries

Fluor is committed to countering corruption and bribery. Offering, promising, giving, demanding or accepting bribes is prohibited by the company. Even if our competitors choose to win business this way, the company will not.

What the Company Expects from You

You must not bribe or make payoffs to anyone, nor may you accept anything of more than nominal value from anyone with whom Fluor does business, including our clients, suppliers or contractors.



Reporting Suspected Violations of Law or Policy

What You Can Expect from Fluor and its Subsidiaries

It is essential that every employee and contractor follows the law and company policies. Any concern about non-compliance should be reported immediately to protect us all. The company will not tolerate retaliation against any employee or contractor who, in good faith, raises concerns about compliance and ethics issues or reports suspected non-compliance.

What the Company Expects from You

If you have a question or concern about something you have done or are about to do, or if you are concerned about the actions of the company, your supervisor, or a fellow employee/contractor, you are expected to express those questions and concerns.

Each and every one of us, no matter what our job or title, is responsible for delivering quality services of unmatched value, and constantly raising the bar on our individual and collective performance.

Getting Help

We are all proud to work for Fluor or one of its subsidiaries. If you have a concern or question about any legal or business conduct issue, there are several ways you can raise it. The most important thing is that you speak up. We will keep your report confidential to the extent that we can.

Where to Report Your Concern

You have several options. Your supervisor is a good place to start with a compliance or ethics issue. You may also get help or advice from:

- Your site Human Resources representative or Industrial Relations representative
- Your supervisor's supervisor (and escalate further up the reporting structure, as necessary)
- A Fluor Company Expert (see page 4)
- Fluor's Compliance and Ethics Hotline (see page 4)

Retaliation Will Not Be Tolerated by Fluor or its Subsidiaries

Retaliation against any employee or contractor, who, in good faith, seeks advice, raises a concern or reports misconduct will not be tolerated. People who attempt to engage in retaliatory conduct will be subject to disciplinary action, which may include termination. If you suspect that you or someone you know has been retaliated against for raising a compliance or ethics issue, immediately contact your site Human Resources representative or call the Compliance and Ethics Hotline.



Fluor's Compliance and Ethics Hotline

If you are uncomfortable using one of the previously mentioned resources available, or wish to raise an issue anonymously, call the Compliance and Ethics Hotline at 1.800.223.1544 (inside the United States) or call collect 1.704.556.7046 (outside the United States). The Hotline is operated 24 hours a day, 7 days a week, by a third-party company that reports the information you provide to Fluor. Translators are available to talk to you in more than 150 languages.

When you call the Compliance and Ethics Hotline, a call specialist will make a detailed summary of your call. The information will then be forwarded to the heads of Corporate Security and Corporate Compliance, who will determine what steps need to be taken to respond to the caller or investigate the matter.

The Compliance and Ethics Hotline assigns tracking numbers so that if you call anonymously, you can still check back to receive a response or provide more information. Of course, giving your name can often help us look into the matter, and as already explained, Fluor and its subsidiaries have a firm policy against retaliation for raising a good faith concern.



Company Experts

You may contact a Fluor Company Expert who is knowledgeable in each listed area. These Company Experts can provide clarification on policies, laws and business practices in their particular area of expertise.

If you send e-mail to the e-mail address that corresponds to the subject area of your concern, it will be routed to the Company Expert in that subject area. A list of the names of the Company Experts and their phone numbers is also available at <http://www.fdnnet.com>.

Subject Area	E-mail
Bribes	anti-corruption@fluor.com
Computer and Data Security	fluor.information.security@fluor.com
Conflicts of Interest	isthisaconflict@fluor.com
Government Contracts	fggcompliance@fluor.com
Gifts and Entertainment	gifts.entertainment@fluor.com
Health, Safety and Environmental	fluor.hse@fluor.com
Security	corporate.security@fluor.com

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