

## **Fluor Corporation Political Activities Policy**

Our business is subject to extensive laws and regulations at the international, federal, state and local levels, and changes to these laws can substantially affect our business. Because of the potential impact public policy can have on our business, we from time to time engage with policy makers in order to advance, preserve and protect the interests of the Company. Meaningful engagement requires Fluor to participate in the legislative process and, where lawful and appropriate, provide support to candidates or ideas. The purpose of this Political Activities Policy is to promote compliance with all laws and regulations applicable to Fluor's political contributions and activities (including lobbying) and to facilitate transparency regarding the Company's political activities.

### **Compliance and Oversight**

All political activities conducted by or on behalf of Fluor are reviewed and approved by the Company's Senior Vice President of Government Relations, following consultation with senior management and legal review by the Chief Legal Officer. In addition, the Governance Committee of the Board of Directors, which is responsible for reviewing and making recommendations regarding the Company's policies and practices related to political contributions and activities, shall annually review this Political Activities Policy as well as a report from Government Relations on specific political contributions, lobbying activities, and participation in trade associations. This review structure helps us focus the Company's efforts on those public policy issues most relevant to the long-term interests of the enterprise overall and to our clients and shareholders.

### **Corporate Political Contributions**

Fluor makes decisions regarding corporate political contributions based on what is in the best interest of the Company, what best supports sound public policy and what we believe to be in the best interest of the United States. Contribution decisions are not based on the personal preferences of Company leaders. Any direct or indirect political contribution of Company funds or other Company assets must be approved in advance by the Fluor Senior Vice President of Government Relations, who reviews such requests in consultation with members of senior management, including legal review by the Chief Legal Officer.

### *Individual Candidates*

Federal laws, as well as the laws of certain states, prohibit the use of corporate resources by the Company for support of individual candidate campaigns for elective office. Consistent with these laws, Fluor does not allow corporate resources to be used to support individual candidate campaigns for federal office or where such support is otherwise prohibited by applicable law. Any contributions made in states that do allow corporate contributions to state and local candidates, committees, political organizations and ballot-issue campaigns must be approved as noted above.

When considering a corporate contribution to permitted state and local candidates, the following factors, among others, are considered:

- The personal characteristics of a particular candidate (including the candidate's reputation);
- Whether the candidate, as an officeholder, is in a position by virtue of committee membership or otherwise to consider and affect policies and legislation relevant to our businesses and the global economy;
- Whether the candidate represents a state or district within which a Fluor business operates or is located; and
- The candidate's political leadership position(s), seniority in office, and voting record.

### *Ballot Measures and Referenda*

Where permitted by applicable law, Company funds may be used to support or oppose ballot measures or referenda to be submitted to voters which would have an important impact on the business of Fluor or its affiliates. No such use of corporate funds should be made by the Company or its affiliates without the prior approval of the Fluor Senior Vice President of Government Relations.

### *Other Nations*

It is Fluor's practice to refrain from making political contributions in any nation other than the United States.

### *Independent Expenditures*

Fluor has a long-standing practice against using corporate resources for the direct funding of independent political expenditures expressly advocating for or against candidates in elections for public office.

### **Semiannual Reports**

Corporate political contributions shall be disclosed by the Company, on a semiannual basis, in reports posted on the Company's website. Each report shall list the Company's monetary and non-monetary contributions and expenditures (direct or indirect), including contributions from FLUORPAC, the Company's separate segregated fund, during the semiannual period to: (i) participate or intervene in any political campaign on behalf of (or in opposition to) any candidate for public office; or (ii) influence the general public, or any segment thereof, with respect to an election or referendum. The report will include the identity of any recipient as well as the amount given.

### **Lobbying Activities Relating to Executive or Legislative Policy Decisions**

Fluor believes in the principle of responsible corporate participation in federal, state and local public policy discussions on matters which affect our business. Consultants may be hired to engage in direct lobbying activity on behalf of the Company, but only with the prior approval of

the Fluor Senior Vice President of Government Relations. We disclose publicly all U.S. federal lobbying expenses and the issues to which our lobbying efforts relate, on a quarterly basis, pursuant to reports required by the Lobbying Disclosure Act. We also disclose state and local lobbying costs and activities where required by applicable law. These reports are publicly available from the [Clerk of the U.S. House of Representatives](#), the [Secretary of the U.S. Senate](#), and state and local governments.

## **Trade Associations**

As a large and diverse global company, Fluor belongs to many trade associations in multiple jurisdictions, through which we work with our industry partners to advance industry interests. Payments made to trade associations by Fluor shall not be directed or earmarked for political activities. For each U.S.-based trade association that receives \$25,000 or more in dues or payments from Fluor in a calendar year, Fluor shall seek and receive confirmation in writing that such funds will not be used to contribute to political parties or candidates, to make independent expenditures on behalf of parties or candidates, or to support or oppose ballot measures or referenda.

In some cases, trade associations to which Fluor belongs engage in government advocacy. While we may be in agreement with the positions the associations take on public policy issues, membership in a particular trade association does not necessarily indicate agreement with all of the association's views. Occasionally, an association will take a position that differs from ours, and in such cases, we will often engage with the association to express our views.

To ensure compliance with the federal Lobbying Disclosure Act, Fluor requires U.S.-based trade associations to which it belongs to report to Fluor the portion of dues used for federal lobbying activities, and these amounts are included in Fluor's publicly-disclosed estimates of lobbying expense.

## **FLUORPAC**

Under the Federal Election Campaign Act, Fluor has established a separate segregated fund known as FLUORPAC. FLUORPAC is an independent, nonpartisan, voluntary fund supported by eligible Fluor employees who choose to participate in the political process by pooling their resources to support the candidacy of candidates who share the values and goals of the Company. The Company bears certain administrative expenses of FLUORPAC, as permitted by law.

FLUORPAC makes contributions to federal candidates, political parties, and other committees that support strong public policy, promote sustainable economic growth and robust markets, and, at the same time, promote innovation and the interests of the business areas in which Fluor operates. A committee made up of employees nominated from Fluor businesses and corporate functions approves all contributions. Among the factors considered in determining which candidates and initiatives to support, Fluor and FLUORPAC representatives balance the views promoted by a candidate, the quality and effectiveness of the candidate or organization to which the contribution is made, and the appropriateness of the level of involvement of Fluor in a

given election. When considering a FLUORPAC contribution to a particular candidate, the following factors, among others, are considered:

- The personal characteristics of a particular candidate (including the candidate's reputation);
- Whether the candidate, as an officeholder, is in a position by virtue of committee membership or otherwise to consider and affect policies and legislation relevant to our businesses and the global economy;
- Whether the candidate represents a state or district within which a Fluor business operates or is located; and
- The candidate's elected political leadership position and voting record.

The Federal Election Commission (FEC) regulates FLUORPAC's activities. Reports detailing the PAC's activities are available on the [FEC website](#).

### **Other Political Action Committees**

Fluor opposes the creation of a political action committee by an outside organization or a joint venture of which the Company is a member.