INTRODUCTION

The Global Reporting Initiative™ (GRI) Standards create a common language for organizations and their stakeholders around the world to report their economic, environmental and social sustainability initiatives in a way that can be universally understood. Sustainability reporting based on the GRI Standards should provide a balanced and reasonable representation of an organization’s positive and negative contributions to sustainable development. The Standards are designed to enhance the global comparability and quality of information on these impacts, thereby enabling greater transparency and accountability of organizations.

The information made available through sustainability reporting allows internal and external stakeholders to form opinions and make informed decisions about an organization’s contribution to the goal of sustainable development. For a full explanation of the GRI Standards, visit www.globalreporting.org.

The GRI aspects shown on the following pages have been determined by Fluor’s executive-level Sustainability Committee to be relevant to Fluor’s operations. The committee is led by an executive sponsor and includes representatives from the company’s Community Relations; Corporate Affairs; Employment Law; Ethics and Compliance; Facilities; Governance; Government Relations; Health, Safety & Environmental; Human Resources; Investor Relations; Sales; Supply Chain and Strategic Planning organizations. As shown in Appendix B of Fluor’s 2019 Sustainability Report, the Sustainability Committee has determined which GRI Standards are pertinent to the company’s operations. In this document, Fluor reports on those GRI Standards relevant to its business operations and measurable in 2019.

Most common URLs used within this table are as follows:

Fluor’s joint venture FDH JV team was selected by Kuwait Integrated Petroleum Industries Company (KIPIC) as the preferred bidder for major engineering, procurement and construction packages for the Al-Zour Oil Refinery Project. The new complex is expected to be one of the largest refineries in the world, and it will use the latest technology to comply with stringent environmental regulations to protect the local environment. We employed a strategy of large-scale modular execution – a first in the country – to achieve greater cost efficiency, enhanced safety performance and minimized strain on the local labor market. The COOEC-Fluor Heavy Industries Co., Ltd. fabrication yard in Zhuhai, China, delivered 188 modules in 20 separate shipments with a combined weight of 65,000 metric tons. In addition, the yard fabricated more than 95,000 pipe spools of carbon steel, alloy and stainless steel pipe.
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The South Carolina Department of Transportation Port Access Road Project team in Charleston overcame challenges such as working near live Interstate 26 traffic, over active rail lines and in environmental cleanup areas of former industrial sites.
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Fluor Corporation

Refer to Services.

Irving, Texas, United States

Refer to Locations.

Fluor is a publicly traded company, with shares listed on the New York Stock Exchange (symbol: FLR).

Refer to 2019 Form 10-K, pp. 5-9.

Refer to 2019 Form 10-K, pp. 9-14, 39.

At year-end 2019, Fluor’s global workforce consisted of 50,182 employees. The workforce consisted of 27,653 salaried employees and 18,084 craft and hourly workers, including Stork employees and 4,445 TRS Agency employees. In 2019, the salaried workforce was 75 percent male, excluding Stork employees.

Refer to Procurement.

There were no significant changes to the organization and its supply chain in 2019.

Refer to HSE Management Policy.

Fluor is involved in a number of charters and initiatives with outside parties. For example, two organizations in which Fluor is involved are the UN Global Compact, the world’s largest corporate sustainability initiative, and Building Responsibly, which promotes worker welfare.

Awards

Fluor, its employees and its projects were honored with a number of external recognitions for sustainable performance in 2019.

- Fluor has been listed on the FORTUNE® Magazine World’s Most Admired Companies® list for 19 consecutive years.
- Fluor was ranked No. 164 on the FORTUNE 500® list.
- Fluor was listed on the North America Dow Jones Sustainability Index for the fifth consecutive year.
- Fluor ranked third on ENR’s Top 400 Contractors list.
- Fluor ranked second on ENR’s 2019 list of Top 500 Design Firms.
- Fluor was named to the Forbes and JUST Capital JUST 100 List in 2018 for the third consecutive year.

Community and Social Services

- Canstruction Orange County, California presented Fluor 2019 Canstruction team with the Best Use of Labels Award at the Orange County Construction Awards.
- Child Advocates of Fort Bend presented Fluor Houston with the Blue Ribbon Award for its effort to elevate awareness of child abuse in Fort Bend County and help care for thousands of abused and neglected children.
- Orange County United Way presented Fluor with the Spirit of Orange Award, an honor for those corporate partners who raise $100,000 or more.
- United Way of Greater Houston recognized Fluor as the No. 1 Donor in Fort Bend County.
- United Way of Greenville County, South Carolina, recognized Fluor with the Top Overall Campaign – Employee and Corporate Award in 2019.
- United Way of Greenville County, South Carolina, presented Fluor with its 2019 Campaign Award of Advancement.
- United Way of Greenville County, South Carolina, recognized Fluor with the Award of Excellence.
- United Way of Greenville County, South Carolina, presented Fluor with its 2019 Chairman’s Award for its support of the organization.
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Fluor’s Golf for Greenville received the Goodwill Industries 2019 Goodwill Champion Award.
South Carolina Ten at the Top recognized Fluor as a Power of 10 partner for providing initial funding for and continued support of Ten at the Top.
Greenville Technical College recognized Fluor at the 2019 National Philanthropy Day Awards Luncheon for Fluor’s support of Greenville Tech and the community.
Metrobank Foundation awarded Fluor in the Philippines with the Partner in Empowerment, Advocacy and Commitment to Excellence (PEACE) award. Fluor partnered with Metrobank Foundation for over a decade, providing scholarships to deserving engineering students.
The Philippine Red Cross recognized and awarded Fluor with the Platinum Award.
Volunteer Services Council of Richmond State Supported Living Centers (SSLC) awarded Fluor in Houston the Partner of the Year Award.

Ethics and Compliance
Fluor was recognized as a World’s Most Ethical Company® by the Ethisphere® institute for the 13th consecutive year. Fluor is one of only two engineering firms to make the global list and one of only eight companies to achieve this distinction since the award’s inception.

Health, Safety and Environmental (HSE)
The American Society of Safety Professionals (ASSP) presented the Gold Award for HSE Excellence and Bronze Award for Environmental Excellence to a Fluor joint venture for the Kuwait Integrated Petroleum Industries Company Al-Zour Oil Refinery Project.
In 2019, Fluor received its 21st Safety Achievement Award and 8th consecutive Excellence in Safety Award from the Puerto Rico Manufacturing Association. Fluor was the only construction company recognized.

Supply Chain
The Houston Minority Supplier Development Council presented Fluor with its 2019 Prime Supplier Award.

Certifications
Many Fluor facilities and projects were certified or recertified for health, safety or environmental management by standard-setting entities in 2019.

ISO 14001 and AS/NZS ISO 14001 (Environmental Management)
- Cebu, Philippines office
- Manila, Philippines office
- Kuala Lumpur, Malaysia office
- Singapore, Singapore office
- Jakarta, Indonesia office

In 2019, Fluor and its employees were associated with the following organizations:
- American Society of Civil Engineers: Subcommittees to the Committee on Sustainability (United States)
- Association of Union Constructors (United States)
- B20 Task Force on Infrastructure
- Center for Corporate Citizenship (United States)
- Conference Board: Career Development Practitioner Council; CFO Council: Fortune 250; Chief Environment, Health and Safety (EH&S) Officers Council; Corporate Communications Strategy Council II; Financial Planning and Analysis Council; Global CSR and Philanthropy Council; HR Technology Council; Innovation Leadership Council; Leadership Development Council; Mergers and Acquisitions Executives Council; Purchasing and Supply Leadership Council; Strategy Executives Council and Sustainability Council I: Strategy and Implementation (United States)
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- Construction Industry Institute (United States)
- Construction Owners Association of Alberta (Canada)
- Construction Users Roundtable (United States)
- Engineering and Construction Risk Institute (United States)
- Engineering Construction Industry Association (United Kingdom)
- European Construction Institute
- Institute of Workplace and Facilities Management (United Kingdom)
- National Minority Supplier Development Council (United States)
- United Nations (UN) Global Compact, signatory
- United States Energy Association: the U.S. Member Committee of the World Energy Council
- Women’s Business Enterprise National Council (United States)
- World Economic Forum

Human Resources, Management and Professional

- American Benefits Council
- Associated Builders and Constructors (ABC), Pelican Chapter, Baton Rouge, Louisiana
- Catalyst (India and United States)
- Construction Benefits Group (United States)
- Council of Employee Benefits: Board of Directors (United States)
- Dallas Fort Worth Business Group (Local Benefits Group)
- Foreign Benefits Study (International)
- International Foundation of Employee Benefits (IFEB) – International Society of Certified Employee Benefit Specialists is the membership group under the IFEB
- International Society for Quality in Health Care
- National Association of Colleges and Employers (United States)
- National Center for Construction Education and Research (NCCER) (United States)

Ethics

- American Chamber of Commerce in India (AMCHAM) – Anti-Corruption and FCPA Compliance Committee
- B20 Anti-Corruption Cross-Thematic Group on Anti-Corruption and Responsible Business Conduct
- Building Responsibly, addressing worker welfare concerns in the engineering and construction industry
- Ethics and Compliance Initiative
- International Compliance Professionals Association
- Member of Partnering Against Corruption Initiative (PACI) and board member of PACI Vanguard of the World Economic Forum
- National Contract Management Association (United States)
- Society for International Affairs
- Society of Corporate Compliance and Ethics

HSE

- American Society of Safety Engineers
- ANSI A10 Accredited Standards Committee for Construction and Demolition (United States)
- Board of Certified Safety Professionals (United States)
- British Safety Council
- BuildSafe South Africa, founding member
- Dropped Objects Prevention Scheme (United Kingdom)
- Energy Facilities Contractors Group (United States)
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## Reporting Requirements

- Institute for Sustainable Infrastructure (United States)
- Institution of Occupational Safety and Health (United Kingdom)
- National Construction Safety Executives (United States)
- National Safety Council (United States)
- Offshore Contractors Association (United Kingdom)
- Oil and Gas UK
- Royal Society for the Prevention of Accidents (United Kingdom)
- Step Change in Safety (United Kingdom/Africa)
- U.S. Green Building Council

### Supply Chain

- Houston Minority Supplier Diversity Council (United States)
- Institute for Supply Management (United States)
- National Contract Management Association (United States)
- Oil and Gas Diversity Council (United States)
- Women's Business Enterprise Alliance and Women's Business Council Southwest (United States)

Refer to [2018 Sustainability Report, p. 2 (CEO Letter)] and [2018 Annual Report, pp. 3-8 (Shareholder Letter)].

Refer to [2019 Form 10-K, pp. 15-33 and pp. 37-51].
Refer to [2020 Proxy Statement, pp. 9-22 and pp. 24-47].

Fluor’s risk- and values-based **Code of Business Conduct and Ethics** (the Code) is the centerpiece of the company’s commitment to operating with the highest standards of integrity. It is available in Arabic, Chinese, Dutch, English, German, Polish, Portuguese, Russian and Spanish. Along with the company’s U.S. Government Contracting supplement to the Code and Anti-Bribery and Corruption Policy, clear standards have been set for employees to apply globally. The Code was developed based on Fluor’s ethics and compliance risks. It is values-based, with an ethical decision-making model and practical learning tools. All salaried employees read and agree to abide by the Code when they begin their employment and annually receive Code-related training and re-certify that they understand and are committed to the Code.

The Code was adopted by corporate senior management and the board of directors, and they must approve any material changes to it. Fluor’s Board of Directors, through its audit committee, maintains oversight of the company’s ethics and compliance program. Fluor’s Senior Vice President and Chief Compliance Officer maintains executive oversight, and the Executive Director of Corporate Compliance oversees the day-to-day activities of the program. The Chief Compliance Officer meets with the Audit Committee of the Board of Directors on at least a quarterly basis and reports certain information to the chair of the Audit Committee more frequently. The company’s Compliance and Ethics Committee, made up of cross-functional executive managers, helps enable Fluor to continue to operate with high ethical business standards and in accordance with applicable laws. To assist the Committee, the Compliance and Ethics Council focuses on oversight of reporting, investigations and corrective and disciplinary actions for any potential violations of the Code. Fluor’s Modern Slavery Act Statement is available online.
Business partners are expected to uphold high ethical standards in compliance with Fluor’s Business Conduct and Ethics Expectations for Suppliers and Contractors, which is modeled on the Code. The Supplier Expectations highlight key expectations in anti-corruption and bribery compliance, trade controls, conflicts of interest, financial and operational controls, human rights and employment practices and health, safety and environmental stewardship.

Mechanisms to seek advice about and report on behavior are extremely important to Fluor. Fluor’s Compliance and Ethics Council, made up of senior executives, including the heads of Fluor’s seven investigating departments—Corporate Investigations; Corporate Security; Health, Safety and Environmental; Human Relations; Internal Audit; Investor Relations; and the Law Department—focuses on oversight of reporting, investigations and corrective and disciplinary actions for any potential violations of the Code.

Fluor maintains a formal open-door policy (HR-101), enabling employees to have honest conversations with managers without the fear of suffering negative consequences. Managers and leadership have been trained to appropriately respond to questions and concerns. Any complaints or issues that are brought to managers or Human Resources undergo a consistent, unbiased investigative process to support the employee and come to a resolution.

Employees can and do protect the company’s reputation by promptly raising a concern when they know or suspect that a colleague is involved in unethical, illegal or dangerous behavior. Employees who have concerns are encouraged to seek guidance and ask questions of Corporate Compliance at corporate.compliance@fluor.com at anytime. Additionally, they are encouraged to contact any of the following: their immediate supervisor, their supervisor’s supervisor and up the reporting structure as necessary, their local Human Resources manager or, if applicable, their Industrial Relations manager or a company subject matter expert. If they are uncomfortable discussing the matter with any of these resources or the response is inadequate, they can contact Fluor’s Compliance and Ethics Hotline at www.fluorhotline.com. Fluor’s hotline is available 24 hours a day, seven days a week. Reports may be made in more than 150 languages. A third party administers the Hotline, including web-based reports. For Hotline calls, the third-party call center answers these calls and transcribes the information reported.

**Governance**

Refer to 2020 Proxy Statement, pp. 11-17.

The executive-level Sustainability Committee, led by an executive sponsor who reports to Fluor CEO Carlos Hernandez includes representatives from Community Relations; Corporate Affairs; Ethics and Compliance; Facilities; Governance; Government Relations; Health, Safety and Environmental; Human Resources; Investor Relations; Employment Law; Sales; Strategic Planning; and Supply Chain Management. The Sustainability Committee meets quarterly, and typically all functions are represented. In conjunction with corporate, functional and business units, the committee assists with the analysis and monitoring of economic, social and environmental risks that are part of the company’s ongoing operations.

Refer to GRI 102: General Disclosures/Governance 102-19.

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Refer to GRI 102: General Disclosures/Governance 102-19.
## Consulting stakeholders on economic, environmental and social topics

Fluor’s stakeholders, including clients, communities, employees, unions, institutions, governments, non-governmental organizations (NGOs), shareholders, subcontractors, suppliers and industry associations, are critical to the company’s success. Many of the priorities associated with sustainability at Fluor result from ongoing interactions with stakeholders, with a premium placed on the following areas:

- Commitment to health, safety and the environment
- Communication
- Corporate governance at the highest level
- Diverse, sustainable supply chain
- Engaged, knowledgeable employees
- Ethical business conduct
- Proactive community involvement

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- Ethical business conduct
- Proactive community involvement

Refer to **2020 Proxy Statement, pp. 2-8; 13-17.**

Refer to **2020 Proxy Statement, p. 12-13.**

Refer to **2020 Proxy Statement, pp. 19-20.**

Refer to **2020 Proxy Statement, pp. 20-22.**

Refer to **2020 Proxy Statement, pp. 11-12.**

Refer to **2020 Proxy Statement, pp. 9, 18.**

Refer to **2020 Proxy Statement, pp. 10, 11-12.**

Refer to **2020 Proxy Statement, pp. 11-12.**

Refer to **2020 Proxy Statement, pp. 11-17.**

Senior Vice President, Chief Compliance Officer and Secretary Dawn Stout served as executive sponsor of Fluor’s Sustainability Committee for 2019, leading an internal team of subject matter experts in developing the report. The report is reviewed by the Chairman, Chief Executive Officer and senior management team.

Refer to **GRI 102: General Disclosures/Governance 102-19.**

Refer to **2020 Proxy Statement, pp. 11-17.**

Refer to **2020 Proxy Statement, pp. 10, 11-12.**

Refer to **2020 Proxy Statement, pp. 11-12.**

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Refer to **2019 Form 10-K, pp. 15-33.**
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**Stakeholder Engagement**

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Fluor believes that a collaborative work environment benefits all parties, including employees, clients and shareholders. The company acknowledges employees’ legal rights to choose whether or not to join third-party organizations without fear of retaliation, coercion or harassment. These rights are in accordance with applicable laws related to third-party involvement, which may include labor unions and/or trade unions in countries where Fluor employees work. Fluor managers and employees receive instruction and periodic training about these rights.

Approximately 4.5 percent of Fluor’s U.S. workforce is covered by collective bargaining agreements; however, this percentage fluctuates as the project-based workforce changes. Fluor does not collect and aggregate global data on specific operations or suppliers who violate or place at significant risk collective bargaining or the right to freedom of association.

Fluor’s stakeholders were determined by identifying with whom Fluor engages:

- Clients hire Fluor for business.
- Fluor interacts with local communities in the course of doing business.
- Fluor employs employees, agency personnel and union workers.
- Fluor is hired by and interacts with institutions, governments and non-governmental organizations.
- Fluor is accountable to shareholders.
- Fluor hires subcontractors.
- Fluor purchases equipment and materials from suppliers.
- Fluor is a member of industry associations.

There are many important ways that Fluor engages with its different stakeholders. For example, confidential and anonymous surveys of employees are conducted to get a sense of employee integrity and evaluate the success of the company’s compliance and ethics programs. Many articles and leadership videos about compliance and ethics, including anti-corruption matters, have appeared on the company’s Intranet site, OneFluorSM. Employees must attain their annual ethics certification by attesting that they are in compliance with the company’s ethics and anti-corruption policies during ethics and anti-corruption training.

No engagement was undertaken specifically as a part of the reporting process.
Fluor places a high priority on being highly responsive and proactive when addressing key topics and concerns that have been raised, so that stakeholders have full confidence in its compliance and ethics program and its commitment to integrity. Employee surveys regarding compliance and ethics are used to improve the program. For example, special core values training with risk-based scenarios was provided when concerns were raised at one location. All hotline reports with concerns raised are reviewed and investigated, and corrective and/or disciplinary action is implemented as appropriate.

**Reporting Practice**

**102-45 Entities included in the consolidated financial statements**

In 2019, Fluor reported results under five primary business segments: Energy & Chemicals; Mining & Industrial; Infrastructure & Power; Diversified Services; and Other, serving clients through various subsidiaries and joint ventures.

**102-46 Defining report content and topic boundaries**

Fluor has prepared the 2019 Sustainability Report under the direction of the Sustainability Committee. The content included in the report and its prioritization were assessed and determined by the Sustainability Committee members. Fluor CEO Carlos M. Hernandez and his senior management team reviewed this report after the Sustainability Committee addressed all material aspects of it. Fluor used the Global Reporting Initiative Sustainability Reporting Standards 2016 to develop its Sustainability Report. In determining content of the report, Fluor's Sustainability Committee considered the company's core values and experience, as well as the reasonable expectations and interests of the company's stakeholders, Fluor's clients key among them. This evaluation formed the basis for a sustainability materiality analysis, as addressed by the GRI's Reporting Principles. This sustainability materiality analysis is separate and distinct from the company's analysis of materiality for other legal and financial reporting purposes, including U.S. Securities and Exchange Commission disclosures. The Sustainability Report covers information regarding overall company strategies, goals and priorities and includes data that are reasonably available.

**102-47 List of material topics**

Fluor used the GRI definition of materiality as one of its Reporting Principles. For all material aspects identified, the related data and performance information in the 2019 Sustainability Report cover Fluor's global operations as a company, unless otherwise noted in situations or circumstances where reporting data are collected and available for only a certain geography, business or issue.

In the context of Fluor's carbon footprint, this GRI Table and 2019 Sustainability Report represent emissions produced within the corporate boundary and exclude emissions produced at client sites and fabrication yards. All other health, safety, environmental, economic, stakeholder engagement, governance, human rights, labor practices, philanthropy and community service data included in the report cover Fluor and its subsidiaries, except as specifically noted. Also refer to 2019 Sustainability Report Appendix B.

**102-48 Restatements of information**

Not applicable. No restatements are necessary.

**102-49 Changes in reporting**

There are no changes in 2019.
Fluor places a high priority on being highly responsive and proactive when addressing key topics and concerns that have been raised, so that stakeholders have full confidence in its compliance and ethics program and its commitment to integrity. Employee surveys regarding compliance and ethics are used to improve the program. For example, special core values training with risk-based scenarios was provided when concerns were raised at one location. All hotline reports with concerns raised are reviewed and investigated, and corrective and/or disciplinary action is implemented as appropriate.

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Also refer to [2019 Sustainability Report Appendix B](#).

Not applicable. No restatements are necessary.

There are no changes in 2019.
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**APPENDIX A**

- SASB Disclosures

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### REPORTING REQUIREMENTS

This GRI Table features quantitative and qualitative data for 2019, as well as information from previous years. It also may include relevant information that became available in 2020 before publication of this GRI Table and the 2019 Sustainability Report. This Table should be read in conjunction with Fluor’s 2019 Sustainability Report, and other publicly filed documents.

**November 2020**


For more information about Fluor’s global sustainability efforts or to share your thoughts about the report, contact:

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 Irving, Texas 75039  
 United States  
 +1.469.398.700  
 [Sustainability@fluor.com](mailto:Sustainability@fluor.com)

Fluor’s 2019 Sustainability Report has been prepared in accordance with the GRI Standards: Core option. The GRI Content Index, as reflected on the Aspect table in the About the Report section of the 2019 Sustainability Report Appendix B, can be found in this table.

The GRI Content Index is reflected in this table.

Fluor did not employ an external organization to audit its Sustainability Reports.
Our team is working safely to decontaminate and decommission more than 10 million square feet of contaminated facilities at the U.S. Department of Energy Portsmouth plant in Pike County, Ohio. In addition, we are partnering with the community to leverage site assets to help the local economy, create jobs and ultimately find new uses for the site.
GRI STANDARD DISCLOSURE

GRI 201: Economic Performance

103-1 Explanation of the material topic and its boundary

Fluor provides financial information, including revenues; cost of revenues; cost of capital, including interest expense and dividends to shareholders; and corporate, general and administrative costs, including compensation costs and retained earnings, in its quarterly and annual filings with the SEC. Details about Fluor’s operations in 2019 are available in the 2019 Form 10-K.

103-2 The management approach and its components

Fluor’s approach to community investment includes a community involvement strategy set by executive leadership and implemented via programs, initiatives and partnerships led by Fluor, the Fluor Foundation and the Fluor Cares® employee volunteer program. Fluor’s primary areas of focus with respect to community investment are education, social services, community and economic development and the environment. These four areas leverage Fluor’s capabilities as a global engineering and construction company and align with its business priorities. This alignment allows Fluor to have a greater positive impact on the communities in which it operates.

103-3 Evaluation of the management approach

Fluor develops annual and multiyear quantitative targets associated with key areas of its community focus to help assess its impact, evaluate the continued relevance of the company’s community involvement strategy and recommend course corrections as appropriate. Tools include a combination of custom and off-the-shelf data management systems for collecting and reporting outputs.

201-1 Direct economic value generated and distributed

Refer to GRI 201: Economic Performance 103-1. Fluor and the Fluor Foundation contributed more than $7 million in 2019 to community initiatives and programs. The equivalent of an additional $1,066,890 was contributed in employee volunteer time. Fluor annually tracks and reports on key community-related metrics.

201-2 Financial implications and other risks and opportunities due to climate change

Refer to 2019 Form 10-K, p. 30.

201-3 Defined benefit plan obligations and other retirement plans

Fluor has consistently funded defined benefit plans currently in effect to at least the minimum levels required by local and national regulatory agencies. Over the past decade, Fluor has continued efforts to transfer open defined benefits plans to a closed status in an effort to manage long-term risks and liabilities.

201-4 Financial assistance received from government

Refer to 2019 Form 10-K, pp. 44, 48.

GRI 202: Market Presence

103-1 Explanation of the material topic and its boundary

Fluor calibrates compensation to meet local market standards and comply with legal requirements, such as minimum wage laws. The focus is on creating fair compensation for all employees. The company considers factors such as business need, economic conditions, individual job responsibilities and personal performance when determining compensation. Fluor has an orderly system for establishing and maintaining both an equitable means of compensating employees and policies and practices that prohibit discrimination based on a number of factors, including gender.

103-2 The management approach and its components

Refer to GRI 202: Market Presence 103-1.

103-3 Evaluation of the management approach

Refer to GRI 202: Market Presence 103-1.

201-1 Ratios of standard entry level wage by gender compared to local minimum wage

Data are not included for privileged, proprietary and/or competitive reasons.

201-2 Financial implications and other risks and opportunities due to climate change

Defined benefit plan obligations and other retirement plans

201-3 Defined benefit plan obligations and other retirement plans

Financial assistance received from government

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Consistently applied systems and reporting enable Fluor to evaluate and adapt its approach to community investments in order to provide better outcomes for community stakeholders and the company.

Also, refer to www.fluor.com/sustainability/community.

Refer to 2019 Form 10-K, p. 30.

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Data are not included for privileged, proprietary and/or competitive reasons.
Fluor values a diverse workforce as a competitive advantage. In all of its global locations, the company uses a variety of methods to attract local management talent. Nine of its 10 largest permanent offices are led by office general managers who come from the country in which the office is located.

Fluor's management approach to indirect economic community impact includes engaging with local communities, governments and municipalities to address project-related social, economic and environmental concerns. These engagements are directed by project managers and conducted jointly with the company's clients and partners. They take place in a variety of ways, including face-to-face meetings, attendance at conferences, employee participation on local boards and involvement with issue-specific campaigns.

Fluor's evaluation of its indirect economic community impact is done at the individual project level. There is no company-wide database that tracks significant infrastructure investments and services or indirect economic impacts across the company due to the large number and disparate nature of projects in multiple markets. Fluor invests in community-building strategies and programs that strengthen society and encourage lasting change. The company supports youth programs and initiatives that develop leadership skills, build character and resiliency, provide job training and construct or refurbish affordable housing and community-serving facilities.

As a global engineering and construction company, Fluor is conscious of its impact on the environment and the need to conserve and protect environmental quality. As a result, Fluor manages its operations consistent with the UN Global Compact's Environmental Principles, which are detailed in the Health, Safety and Environmental section of this table.

Fluor supports programs that preserve and/or enhance natural resources and habitats. In 2019, Fluor employees recycled or disposed of 17.8 tons (16.1 tonnes) of litter and helped plant nearly 6,300 trees, flowers and shrubs to beautify and restore communities where they live and work. For the past six years, as part of a collaborative worldwide effort, Fluor has organized the Global Shore Cleanup to help clean areas bordering oceans, rivers, lakes and parks to benefit the environment. In 2019, volunteers helped restore miles of shoreline, removing more than 5.3 tons (4.8 tonnes) of garbage and recyclable waste.
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Fluor is proud to support the men and women of the U.S. military, seeking ways to improve their lives and those of their families. In 2019, Fluor supported efforts such as the Army Scholarship Foundation; Army Women’s Foundation; Boys and Girls Clubs of America Military Youth Initiative; Texas Sentinels Foundation, which provides debt-free housing for wounded veterans; and Upstate Warrior Solution, which provides workforce training and professional development opportunities for combat veterans.
GRI 204: Procurement Practices

103-1 Explanation of the material topic and its boundary

103-2 The management approach and its components

103-3 Evaluation of the management approach

204-1 Proportion of spending on local suppliers

GRI 205: Anti-corruption

103-1 Explanation of the material topic and its boundary

103-2 The management approach and its components
**Procurement Practices**

Procurement is an integral component of the projects that Fluor executes. In 2019, more than $12 billion was spent procuring equipment, material and services.

Procurement on a project adheres to Fluor standard practices. Individual projects may have additional practices and policies from the project client to supplement Fluor standards. **Fluor’s Business Conduct Expectations for Suppliers and Contractors** are incorporated into the Terms and Conditions of every purchase order and subcontract for mandatory adherence by suppliers and contractors.

Audits may be periodically conducted to confirm compliance with procurement practices.

Fluor defines local supply as products or services that are manufactured, shipped or provided in regional or local proximity to where they are installed or used. For goods, this can include interim points of manufacture or fabrication, in addition to the eventual jobsite itself. Defined in this way, Fluor’s local spend was approximately 75 percent of its total global spend, which was more than $12 billion in 2019.

Fluor’s risk management begins with its ethical culture and core values that support good decision-making and the company’s stance against corruption and includes formal processes to assess and combat the potential for corruption.

Refer to **Anti-corruption Initiatives**.

The company’s approach to project teams includes assessing and managing ethics and compliance risks specific to each project. Fluor’s Business Risk Management Framework (BRMF\(^{TM}\)) is a formal system to assess, manage and monitor risks at Fluor projects. Fluor employs this framework to assess a project’s risk potential. Fluor projects are assessed for corruption-related risks, such as location of the project, business culture, third parties which are locally required and government touch points.

Fluor also has a structured practice for project ethics and compliance. The Preliminary Project Compliance and Ethics Plan Assessment process is intended to be initiated during the preparation of a sales proposal. Bid/no bid decisions are based on analyzing a project’s risk profile according to the BRMF and the Preliminary Project Compliance and Ethics Plan Assessment, assessing anti-corruption, trade compliance, fair competition, worker welfare, information security, conflict of interest, confidential information and other ethics and compliance-related risks. Upon award, the completed assessment supports the development and implementation of the project’s ethics and compliance plan.

At a corporate level, Fluor has an Enterprise Risk Management program, as well as subject-matter-based task forces that assess the company’s anti-corruption and other ethics and compliance risks.

Due to the nature and locations of Fluor’s work, the two most significant corruption risks stem from the large number of third parties with which the company works and frequent contact with governments around the world throughout a project’s life cycle. Fluor will pursue only projects that can be executed without violating its **Code of Business Conduct and Ethics** (the Code).
Refer to GRI 205: Anti-corruption 103-2.

205-1 Operations assessed for risks related to corruption

Fluor uses various risk assessment procedures for corruption. All operations are assessed for risks related to corruption. At a corporate level, Fluor has an Enterprise Risk Management program and ethics and compliance subject-matter-based task forces who assess corruption risks on a periodic basis. The regulatory landscape, industry risks, risks seen by the company and any other relevant indicators to help understand risks are considered. At a project level, the company’s Business Risk Management Framework (BRMFSM) is used to assess corruption risks of each project against a background of project location, business culture, third parties which are locally required and government touch points.

Additionally, each project is required to assess its corruption risks through a mandatory Project Compliance and Ethics assessment practice. Due to the nature and location of Fluor’s work, the two most significant corruption risks stem from the large number of third parties with which Fluor works and frequent contact with governments around the world through a project’s life cycle.

Fluor addresses conflicts of interest immediately through mandatory prompt reporting to HR for review and resolution. An additional layer of review requires the annual disclosure of conflicts of interest.

205-2 Communication and training about anti-corruption policies and procedures

Fluor’s anti-corruption policies and procedures have been communicated to all directors, employees and business partners. The Code, the Anti-Bribery and Corruption Policy and charitable donation procedures specifically address charitable donations and scholarships to ensure they are not used as disguised forms of bribery.

Fluor employees in all regions receive anti-corruption training. Additionally, Fluor provides tailored training and communication to employees in situations that have been identified as having a high risk of corruption.

Fluor works with effective global platforms and others in the industry to fight corruption. The company is a founding member of the United Nations (UN) Partnering Against Corruption Initiatives (PACI) and a UN Global Company signatory. Fluor CEOs and Fluor’s current Executive Chairman have been PACI Vanguard directors for many years and one co-chaired the B20 Task Force on Improving Transparency and Anti-Corruption.

205-3 Confirmed incidents of corruption and actions taken

Any and all confirmed incidents of corruption result in appropriate discipline and corrective action including termination if appropriate.

GRI 206: Anti-competitive Behavior

103-1 Explanation of the material topic and its boundary

Anti-competitive behavior can occur during the sales and procurement functions.

103-2 The management approach and its components

Fluor maintains policies and practices and provides training and communications to employees in situations that have been identified as having a high risk of anti-competition. Suppliers are prohibited from engaging in anti-competitive practices.

Refer to section Competing Fairly in the Market Place of Fluor’s Code of Business Conduct and Ethics, p.43.

Refer to Fluor’s Business Conduct Expectations for Suppliers and Contractors.

103-3 Evaluation of the management approach

Fluor evaluates its management approach by conducting periodic assessments to determine whether a risk has increased, decreased or changed and addressing the risk accordingly.

206-1 Legal actions for anti-competitive behavior, anti-trust and monopoly practices

Fluor is not aware of any anti-competitive legal actions in which it has been identified as a participant in 2019.
Fluor uses various risk assessment procedures for corruption. All operations are assessed for risks related to corruption. At a corporate level, Fluor has an Enterprise Risk Management program and ethics and compliance subject-matter-based task forces who assess corruption risks on a periodic basis. The regulatory landscape, industry risks, risks seen by the company and any other relevant indicators to help understand risks are considered. At a project level, the company’s Business Risk Management Framework (BRMF™) is used to assess corruption risks of each project against a background of project location, business culture, third parties which are locally required and government touch points.

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### GRI 206: Anti-competitive Behavior

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Refer to section Competing Fairly in the Market Place of Fluor’s Code of Business Conduct and Ethics, p.43. Refer to Fluor’s Business Conduct Expectations for Suppliers and Contractors.

Fluor evaluates its management approach by conducting periodic assessments to determine whether a risk has increased, decreased or changed and addressing the risk accordingly.

Fluor is not aware of any anti-competitive legal actions in which it has been identified as a participant in 2019.
The Arizona Department of Transportation Loop 202 South Mountain Freeway Project team kept waste out of the landfill and turned steel scrap into the 38 million pounds of rebar needed to construct 40 freeway bridges.
GRI STANDARD | DISCLOSURE
---|---
GRI 302: Energy | 
103-1 | Explanation of the material topic and its boundary
103-2 | The management approach and its components
103-3 | Evaluation of the management approach
302-1 | Energy consumption within the organization
302-2 | Energy consumption outside of the organization
302-3 | Energy intensity
302-4 | Reduction of energy consumption
302-5 | Reductions in energy requirements of products and services
Fluor has control over its offices and the energy measured relates to those offices around the world. Energy use in offices is material from a sustainability standpoint due to the economic impact on office operations.

Each office is responsible for determining how it will meet energy needs and implementing sustainability initiatives to address those needs.

Facility management uses the return-on-investment approach to determine which initiatives to implement to reduce energy consumption while providing consistent sources of energy for office operations.

In 2019, direct energy consumption by Fluor facilities was approximately 36 million kilowatt hours (approximately 130,000 gigajoules) for natural gas, diesel, propane and gasoline. Indirect energy consumption at Fluor facilities in 2019 was approximately 89.5 million kilowatt hours (approximately 322,000 gigajoules) for electricity.

Fluor transportation-related green initiatives to reduce environmental impact include bicycling programs; using energy-efficient vehicles, such as hybrid and electric models; providing vans to and from transportation hubs or between offices; providing interoffice shuttles and encouraging carpooling. Video conferencing and training webinars are well established across the network of Fluor global offices, helping colleagues around the world collaborate while reducing Fluor’s travel footprint. Video conferencing is used routinely across the company for communicating with project sites, clients and offices. Limiting travel on projects also helps reduce Fluor’s travel footprint. Increased local sourcing of materials is an important part of Fluor’s commitment to promoting sustainable development by reducing delivery distances, vehicle fuel use and carbon emissions.

Fluor does not measure energy consumption outside its organizational boundary. That responsibility lies with the energy companies providing power to the offices.

Refer to GRI 302: Energy 302-1.

Fluor works to either improve energy efficiency by lowering operating costs and integrating environmentally friendly solutions in its 150 facilities in 31 countries around the world or to exceed the standards set by leading sustainability organizations.

Fluor is proud of the results of its continuous improvement programs, which have achieved U.S. Environmental Protection Agency (EPA) ENERGY STAR® certifications for over 1.25 million square feet of office buildings in Houston, Texas and Aliso Viejo, California, for seven consecutive years. The certifications reflect Fluor’s commitment to operational optimization, continuous improvement, organic carbon reduction and sustainability. To be considered for ENERGY STAR certification, office properties must rank in the top 25 percent for energy efficiency compared to similar buildings and meet all current indoor environment standards. ENERGY STAR-certified buildings typically use 35 percent less energy and have 35 percent lower carbon emissions than average buildings.

Sustainability is a company-wide philosophy as reflected in Fluor’s Building Research Establishment Environmental Assessment Method (BREEAM), Leadership in Energy and Environmental Design (LEED) and ENERGY STAR-certified buildings. Fluor is committed to adopting the best environmental methods wherever possible and reducing energy consumption, carbon emissions and operating expenses.

**NABERS Certification**

Fluor’s Perth, Australia office has received 5.0-Star NABERS Energy Rating.

Refer to GRI 305: Emissions 305-5.

Fluor’s energy requirement relates to buildings, as the company provides services to clients in its offices during the design phases and preparation for construction. Once a project goes into construction, the job site and energy requirements are the clients’ responsibilities. Given that the energy requirements relate to buildings, the 2019 Sustainability Report and this GRI Table provide this information. Energy requirements for products relates to products created by Stork.
GRI STANDARD DISCLOSURE

GRI 305: Emissions

103-1 Explanation of the material topic and its boundary

Emissions of greenhouse gases are material to Fluor in the setting of office operations, as these emissions are generated primarily as Scope 2. The boundary is Fluor's offices, given that Fluor has control over these operations. The baseline excludes client sites, fabrication yards and Stork facilities. Stork facilities acquired in 2016 were added to the Fluor scope for emissions calculations in 2019.

103-2 The management approach and its components

Fluor follows the Greenhouse Gas Emissions (GHG) Protocol standards for inventory over which Fluor maintains operational control and updates emission factors periodically. The basic unit of measure used throughout the GHG inventory is metric tons of equivalent carbon dioxide (tCO2e). Emission sources in Fluor's GHG inventory include electricity, steam and other stationary fuel consumption for Fluor's facilities, refrigerants used in building cooling systems, fleet vehicle fuel consumption and emissions associated with business-related air travel. For each source, GHG emissions are quantified in the inventory for the following, if applicable: carbon dioxide, methane, nitrous oxide and any hydrofluorocarbon refrigerants reported.

Fluor's UK operations are subject to carbon emissions regulations. Fluor does not buy carbon credits in order to reduce its emissions. In general, Fluor is not governed by a requirement to measure its carbon footprint. However, Fluor established its global carbon footprint in 2006 for offices, vehicle fleets at those offices and air travel.

103-3 Evaluation of the management approach

Evaluation is reflected in absolute emissions and normalized emissions (normalized by revenue).

305-1 Direct (Scope 1) GHG emissions

Refer to 2019 Sustainability Report, pp. 12-14, Appendix A.

305-2 Energy indirect (Scope 2) GHG emissions

Refer to 2019 Sustainability Report, pp. 12-14, Appendix A.

305-3 Other indirect (Scope 3) GHG emissions

Refer to 2019 Sustainability Report, pp. 12-14, Appendix A.

305-4 GHG emissions intensity

Refer to 2019 Sustainability Report, pp. 12-14, Appendix A.

305-5 Reduction of GHG emissions

Energy efficiency activities help manage the amount of carbon emissions generated at Fluor's global facilities. With approximately 8.4 million square feet (approximately 778,000 square meters) of office space and associated land in 31 countries, voluntary and diverse conservation, energy efficiency and green initiatives are providing cost-effective solutions and contributing significant value to the company.

In 2019, Fluor continued to integrate a variety of energy efficiency and conservation practices into daily operations to reduce energy consumption by almost 12 million kilowatt-hours (approximately 47,000 gigajoules).

Energy reduction practices included installing solar panels, replacing lighting with LED lights, changing operating time on air conditioning units and switching to energy efficient appliances.

305-6 Emissions of ozone-depleting substances (ODS)

Fluor does not manufacture, import or export ozone-depleting substances.

305-7 Nitrogen oxides (NOX), sulfur oxides (SOX) and other significant air emissions

Because Fluor assets are offices, only greenhouse gases are measured. Nitrogen oxides, sulfur oxides, volatile organic compounds, hazardous air pollutants and particulate matter are air pollutants not associated with the office environment and are not measured.

GRI 306: Effluents and Waste

103-1 Explanation of the material topic and its boundary

Water consumption in Fluor's offices relates to drinking water and water used in lavatories.

103-2 The management approach and its components

Fluor encourages its employees to practice water conservation and waste minimization. Dining facilities within offices practice conservation as well. In some cases, the company recycles landscape water. Fluor maintains a corporate HSE policy stating its commitment to these goals.

103-3 Evaluation of the management approach

Conservation is measured by the amount of water brought into each facility as measured by municipality invoices.

305-1 Direct (Scope 1) GHG emissions

Emissions of ozone-depleting substances (ODS)

305-2 Energy indirect (Scope 2) GHG emissions

305-3 Other indirect (Scope 3) GHG emissions

305-4 GHG emissions intensity

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103-1 Explanation of the material topic and its boundary

103-2 The management approach and its components

103-3 Evaluation of the management approach
**REPORTING REQUIREMENTS**

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Conservation is measured by the amount of water brought into each facility as measured by municipality invoices.
### GRI 306: Environmental Standards Series

#### 306-1 Water discharge by quality and destination
- In 2019, Fluor conserved approximately 305,000 gallons (1.15 million liters) of water in its facilities. Conservation programs included deployment of low-flush valves, installation of automatic faucet sensors and commodes and low-flow showerheads.
- Water for potable use and landscaping is generally obtained by Fluor offices from municipal water authorities. Responsibility for sources of municipal water and any impact caused by water withdrawal belongs to the water authorities.
- In a few cases, rainwater in ponds is used and reused for landscaping and runoff returns to the ponds. Water used in kitchens and bathrooms cannot be recycled or reused per regulations.
- Water on project sites is obtained by the property/project owners, and discharge occurs through the owners’ discharge permits.

#### 306-2 Waste by type and disposal method

**Waste Reduction, Reuse and Conservation**
- Fluor offices reduce waste by donating electrical appliances and used furniture, office supplies, chairs, carpet and computers to schools, homes for the elderly and non-profit organizations. During 2019, approximately 134 tons (122 tonnes) of these items were donated or reused rather than sent to local landfills. During renovations, furniture and materials, including low-emitting and recycled-content materials, are reused whenever possible. Approximately 2,969 tons (2,693 tonnes) of solid waste were sent to landfills in 2019.
- Conservation and landfill avoidance activities are also an important part of Fluor’s global HSE initiatives. Fluor’s ongoing initiative to promote double-sided printing saved approximately 47 tons (43 tonnes) of paper in 2019.

**Recycling**
- In 2019, Fluor offices worldwide, through their active recycling programs, recycled approximately 543 tons (493 tonnes) of paper, 117 tons (106 tonnes) of cardboard, 8.5 tons (7.7 tonnes) of batteries and 272 tons (247 tonnes) of mixed recyclable materials. Additionally, 220 tons (200 tonnes) of solid waste were sent to energy recovery facilities.
- In 2019, 1,060 tons (962 tonnes) of assorted bulk material was recycled. Assorted bulk material included aluminum cans, glass containers, iron, steel, landscape trimmings, light bulbs, cooking oil, tires, plastic containers and toner and ink cartridges.

#### 306-3 Significant spills
- Fluor had no significant spills in 2019.

#### 306-4 Transport of hazardous waste
- Because Fluor operates office buildings, no hazardous waste is generated.

#### 306-5 Water bodies affected by water discharges and/or runoff
- Fluor does not have receiving water bodies. Water discharges are returned to the water authorities for treatment. Typically, only the water intakes are metered, and invoice calculations for influents and effluents are based on influent volume.
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Fluor has a long-standing commitment to the UN Global Compact, including its Environmental Principles 7 through 9. Fluor began tracking data related to these principles in 2004.

Fluor uses its Sustainability Performance Indicator Management System (SPIMS) to manage its environmental data.

The efficiency of the management approach is determined by the accuracy of the data from each office.

In 2019, Fluor did not receive any monetary sanctions for noncompliance related to environmental issues. One location was cited for missing a required water sampling.
Fluor continually evaluates new and existing suppliers, validating their technical and commercial qualifications to supply goods and services to projects. While environmental criteria are not tracked in bid evaluations, suppliers must comply with environmental laws and regulations mandated in each project’s prime contract. These contract provisions and governing regulations are stipulated in purchase orders and subcontract language, and the process is vigorously documented, as is compliance with laws at points of supply and jobsites.

**GRI 308: Supplier Environmental Assessment**

- **103-1** Explanation of the material topic and its boundary
- **103-2** The management approach and its components
- **103-3** Evaluation of the management approach
- **308-1** New suppliers that were screened using environmental criteria
- **308-2** Negative environmental impacts in the supply chain and actions taken

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**APPENDIX A**
- SASB Disclosures
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Refer to GRI 308: Supplier Environmental Assessment 103-1.

Fluor does not evaluate the management approach to environmental programs of our suppliers and contractors.

Fluor does not screen suppliers using environmental criteria.

Fluor does not collect data from its projects on supplier environmental assessments; however, the company actively complies with laws and regulations relating to any environmental impacts found within its supply chain and/or at its jobsites. Fluor proactively works to enforce the adherence of its suppliers and contractors to all laws, codes and regulations pertaining to health, safety and environmental considerations through formal mandates and provisions in contracts for goods and services. Refer to Fluor’s Business Conduct Expectations for Suppliers and Contractors.
Employees on the Guinea Alumina Corporation Bauxite Mine Project participated in a clean-up during Fluor’s HSE Week in May 2019. For 15 years, our projects and offices have engaged in the annual, global celebration to promote the safety of our employees, clients, contractors and communities.
For more than 100 years, Fluor has maintained a viable business based on ethical and sustainable business practices. The company's highly skilled, diverse workforce of 46,980 employees helps create a workplace environment that builds strong internal and external relationships in order to serve clients across many industries and geographies.

The company's approach to employees and the workplace includes the development and implementation of a comprehensive global human resources strategy that provides both short- and long-term focus on employee-related objectives in support of the business.

Each year, the human resources strategy is reviewed and updated in accordance with the company's business strategy. Some data are not included in this report for privileged, proprietary and/or competitive reasons.

Fluor provides its employees with insurance coverage that can support their health and well-being in alignment with regulations and competitive benchmarking. Salaried employees in many locations have opportunities to participate in life, health and disability insurance coverage, as well as retirement savings choices. Part-time employees in some countries may also be eligible to receive these benefits. Additionally, Fluor's global offices continue to increase opportunities for employees to proactively learn about and engage in improving their health and well-being. Programs to support proactive, preventive health and wellness are a top priority for the company. Many global offices continue to promote programs and activities that engage employees in managing their own health. The following are a few examples of local wellness initiatives:

- Fluor’s Global Benefits Team provides training and resources to regional and country subject matter experts on well-being. A global walking challenge is held annually, enabling country teams to compete within their region.

- The health and wellness program in Fluor’s office in India provides:
  - A health insurance plan which covers employees, dependent children, parents and/or parents-in-law.
  - Preventive annual health check-ups for its employees. Employees’ dependents can also participate on a self-paid basis. Health concierge cards are provided to participating employees and their dependents, offering year-long unlimited telephonic/video physician consultations and discounts on medical services.
  - A pregnancy care program, which includes online learning modules, informative mailers, query resolutions and telephonic and email-based consultations.
  - A creche day care program for employees’ children from 6 months to 6 years of age.
  - Onsite health camps, which offer employees flu vaccinations, diet consultation, dental care, spirometry tests, eye tests and tests for blood pressure and sugar levels, as well as for body mass and bone mineral density.
  - Awareness camps, which focus on heart and liver health, lifestyle management, parenting, yoga, women’s health, emotional well-being and stress management.

- The Netherlands office provides health assessments for employees and hosts an annual well-being week. To promote a healthy lifestyle, employees can participate in a bike plan, as well as in a fitness program. A new health and well-being program is being rolled out this summer, focusing on mental, physical and social issues. In addition, some fun physical activities have been added during HSE week, including Zumba®, cycling, Pilates and running classes.

Fluor provides parental leave in accordance with applicable laws and regulations. Employees and their families benefit from having leave time to care for family needs. The company also benefits when Fluor’s employees are retained after their leave concludes. In the United States, Fluor’s policy provides eligible employees an unpaid leave of absence of up to 12 weeks in a single, rolling 12-month period to accommodate birth; adoption; foster care; child, spouse or parental illness; and other qualifying reasons.

Fluor adapts its leave policies, as necessary, to meet all applicable legal requirements in any jurisdiction in which it operates. Data are not included for privileged, proprietary and/or competitive reasons.
Reporting Requirements

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GRI 402: Labor/Management Relations

103-1 Explanation of the material topic and its boundary

Human resources policies, practices and services enhance the company's ability to grow intellectual capital and address both current and future workforce and workplace needs. They also serve to reinforce legal requirements and corporate commitments regarding fair employment processes and human rights.

103-2 The Management approach and its components

Recruiting and Hiring

Fluor uses recruiting and hiring practices to develop and employ a diverse local, regional and global workforce. All current and future employees benefit from company policies that drive nondiscriminatory hiring, training, testing, promotion, transfer, compensation, leaves of absence and termination practices based on lawful employment-related criteria.

Hiring and training local talent, including developing local leaders at office and site locations, demonstrates Fluor's commitment to supporting communities where it conducts business. The company is committed to helping its employees develop the skills necessary to meet local market labor needs.

103-3 Evaluation of the management approach

Fluor is committed to maintaining a successful, diverse and effective workforce. Employee exit interviews and any complaints are monitored to ensure that Fluor's Human Resources policies are successful at meeting the company's workforce goals.

402-1 Minimum notice periods regarding operational changes

Refer to GRI 402: Labor/Management Relations 103-1.

Data are not included for privileged, proprietary and/or competitive reasons.

GRI 403: Occupational Health and Safety

103-1 Explanation of the material topic and its boundary

Occupational Health and Safety (OH&S) is a material topic given Fluor's emphasis on a safe working environment. The boundary for OH&S is Fluor's offices and the project sites over which it has control.

103-2 The Management approach and its components

The structure of Fluor's HSE Management System (MS) incorporates several levels of control as shown below.

The HSE MS includes consideration of:

- Sustainable development
- Risk management
- Accountability to community
- Cross-discipline cooperation
- Best practices
- Requirements applicable to the scope of work (such as regulatory requirements, in-country standards and contract requirements)

The HSE Policy outlines Fluor's commitment to and position on HSE management. The HSE MS has been developed in support of this policy.

The HSE Principles provide the fundamental precepts upon which the HSE MS is based and executed. Practices establish the performance requirements for offices, engineering and projects.

Procedures and plans are the implementation documents developed at the project level. Client procedures and plans may be substituted for Fluor's procedures and plans or tailored to a particular project if they meet or exceed Fluor requirements and are required by the client.

While it is recognized that there are different, but related, requirements and responsibilities for office, engineering and field execution activities, the HSE MS is designed to integrate these functions.

103-3 Evaluation of the management approach

The HSE MS is based on a continual improvement model, as contained in international standards such as ANSI Z 10:2005, OHSAS 18002:2000 and ISO 14001:2004.

The HSE MS is reviewed at least annually to accommodate factors such as changing expectations, new objectives, new legislation, organizational changes and results from continual improvement elements.
## REPORTING REQUIREMENTS

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403-1 Occupational health and safety management system

All employees and contractors on project sites under the control of Fluor, including its joint venture partners, must adhere to the HSE MS or an equivalent program approved by Fluor. The HSE MS is a comprehensive program that incorporates legal requirements, as well as identification and management of risks. Refer to HSE Management System.

403-2 Hazard identification, risk assessment and incident investigation

Fluor implements a process for identifying hazards in the workplace, including both offices and project sites, and for mitigating those hazards. The hierarchy of control is used, with the intent to eliminate hazards where possible, followed by substitution, engineering controls and administrative controls. Personal protective equipment is the least effective control per the hierarchy. Workers who are charged with identifying hazards in a specific venue are trained to appropriately do so, and training documents are maintained. Prior to initiating a task, a Job Safety Analysis (JSA) is performed. Each day that a task is performed, the team participates in a Safety Task Assignment built on the JSA to confirm that the hazards are known and have been mitigated according to the control hierarchy.

Workers are required to report unsafe conditions and have the authority to stop work, so an investigation and evaluation can occur. Fluor’s HR procedures prevent reprisals, and Fluor maintains a company ethics hotline to allow anonymous complaints.

Fluor maintains a robust process to investigate incidents. The basic purpose of an incident investigation is to prevent a recurrence of the incident. The objectives of an incident investigation are:

- Determine facts associated with the incident
- Correct unsafe conditions
- Eliminate unsafe acts
- Improve work capability
- Improve supervision

The investigation phase begins as soon as the supervisor is made aware of the incident. While treatment of injuries and immediate HSE concerns created by the incident are the initial top priority, the supervisor carefully observes the incident scene, planning for follow-up action and future reference. Once the immediate needs caused by the incident have been satisfied, the supervisor begins to investigate the incident in detail. Taking into account any injuries or personnel problems that occurred as a result of the incident, the supervisor interviews the personnel involved in the incident and witnesses to it. The important considerations after an incident are:

- Mitigate the impact on personnel involved in the incident
- Mitigate the impact on Fluor as a result of the incident
- Prevent reoccurrence of a similar incident

The HSE representative conducts the investigation with the supervisor(s) of the individual(s) involved in the incident.

403-3 Occupational health services

Occupational health services are provided on each project by the HSE department. On a mega-project, Fluor typically hires medical professionals and creates a clinic for workers. On smaller projects, medics and emergency medical technicians provide their services. It is the responsibility of the HSE department and medical personnel to definitively identify hazards and work with the construction and fabrication personnel to mitigate those hazards.

403-4 Worker participation, consultation and communication on occupational health and safety

Fluor’s worker and leadership engagement was highlighted by its new Safer Together theme, which embraces a commitment to a caring and preventive culture. The 10 actions that will help achieve the Safer Together objectives were implemented in 2019. A new company-wide incident and injury response protocol that details requirements for recording, communicating and investigating incidents based on their severity was issued. This new protocol has already resulted in a steady stream of HSE Incident Alerts issued in a new standardized format with the objective of preventing incident recurrence. For more information on the Safer Together program, refer to HSE section of 2019 Sustainability Report, p. 9.
## REPORTING REQUIREMENTS

All employees and contractors on project sites under the control of Fluor, including its joint venture partners, must adhere to the HSE MS or an equivalent program approved by Fluor. The HSE MS is a comprehensive program that incorporates legal requirements, as well as identification and management of risks.

Refer to [HSE Management System](#).

Fluor implements a process for identifying hazards in the workplace, including both offices and project sites, and for mitigating those hazards. The hierarchy of control is used, with the intent to eliminate hazards where possible, followed by substitution, engineering controls and administrative controls. Personal protective equipment is the least effective control per the hierarchy.

Workers who are charged with identifying hazards in a specific venue are trained to appropriately do so, and training documents are maintained. Prior to initiating a task, a Job Safety Analysis (JSA) is performed. Each day that a task is performed, the team participates in a Safety Task Assignment built on the JSA to confirm that the hazards are known and have been mitigated according to the control hierarchy.

Workers are required to report unsafe conditions and have the authority to stop work, so an investigation and evaluation can occur. Fluor’s HR procedures prevent reprisals, and Fluor maintains a company ethics hotline to allow anonymous complaints.

Fluor maintains a robust process to investigate incidents. The basic purpose of an incident investigation is to prevent a recurrence of the incident. The objectives of an incident investigation are:

- Determine facts associated with the incident
- Correct unsafe conditions
- Eliminate unsafe acts
- Improve work capability
- Improve supervision

The investigation phase begins as soon as the supervisor is made aware of the incident. While treatment of injuries and immediate HSE concerns created by the incident are the initial top priority, the supervisor carefully observes the incident scene, planning for follow-up action and future reference. Once the immediate needs caused by the incident have been satisfied, the supervisor begins to investigate the incident in detail. Taking into account any injuries or personnel problems that occurred as a result of the incident, the supervisor interviews the personnel involved in the incident and witnesses to it. The important considerations after an incident are:

- Mitigate the impact on personnel involved in the incident
- Mitigate the impact on Fluor as a result of the incident
- Prevent recurrence of a similar incident

The HSE representative conducts the investigation with the supervisor(s) of the individual(s) involved in the incident.

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Worker participation, consultation and communication on occupational health and safety

Worker training on occupational health and safety

Promotion of worker health

Prevention and mitigation of occupational health and safety impacts directly linked by business relationships
The HSE function participated in a Requirements-Based Practices (RBP) initiative in 2017 to streamline HSE work processes across functions, ensure that requirements for all HSE practices are clearly stated and designate responsibility for completing each requirement. This initiative will result in greater efficiency and consistency in implementing sustainability and HSE practices.

In 1992, Fluor created the Silver Safety Medallion Award, which recognizes employees who have acted in a life-saving manner and/or assisted others in distress either on or off the job. More than 400 Silver Safety Medallions have been awarded to Fluor employees since the program was implemented.

Fluor conducts extensive health and safety training for its employees and provides the course contents to contractors. These courses are instructor led, as well as computer based. Examples of training include:

- HSE 025 Pre-Task Planning, Risk Analysis
- HSE 100 HSE Management System Overview
- HSE 104 Ergonomics
- HSE 105 Barricades, Signs and Tags
- HSE 106 Personal Protective Equipment
- HSE 109 Hot Work (Welding, Cutting, Burning)
- HSE 107 Pressurized/Compressed Air and Gas Cylinders
- HSE 108 Portable Ladders
- HSE 135 Respiratory Protection
- HSE 243 Signal Person
- HSE 132 Hazardous Energy Control
- HSE 133 Excavation, Trenching and Shoring
- HSE 136 Fall Protection
- HSE 137 Confined Space Entry
- HSE 147 Motorized Heavy Equipment
- HSE 156 Loading and Unloading Material
- HSE 187 Electrical Work Safety
- HSE 242 Rigging Basics
- HSE 244 Cranes
- HSE 245 Motor Vehicle Operations
- HSE 150 Hand Safety Awareness
- HSE 110 Hand and Portable Power Tools
- HSE 173 Basics of Sustainability

All workers are provided health services related to their work. Employees' needs are addressed by Fluor, while contractors are required to provide appropriate health services to their employees per contractual requirements. As noted in GRI 403: Occupational Health and Safety 403-3, project sites provide workers with health care. In office locations, employees are offered health insurance and health services, such as health assessments and wellness coaching.

The company offers a number of health-based programs, such as Naturally Slim Weight Management, Chronic Condition Management and Healthy Eating. Employees decide whether to participate.

Fluor has extensive experience identifying and mitigating negative occupational health and safety impacts on a construction site and at its fabrication facilities. In most cases, Fluor or a joint venture partnership has control over the project site and implements the HSE MS. In a small number of cases, Fluor provides resources, but the client has ownership of the site. In those cases, Fluor confirms that potential impacts to its employees have been identified and appropriately addressed. All employees visiting a project site must undergo mandatory HSE training before arriving at the site. When visiting a project site, the client will often ask for Fluor's perspective on additional preventative measures that could be taken.
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## REPORTING REQUIREMENTS

Fluor’s HSE MS establishes basic requirements for all Fluor operations and employees. Refer to [HSE Management System](#).

All Fluor employees are covered by the company’s HSE MS. Contractors are contractually required to have an equivalent HSE MS or be covered directly under Fluor’s HSE MS.

Fluor implements a robust audit protocol on all of its projects. There are various levels of audits, including area, management and corporate audits.

The 2019 Sustainability Report, p. 11, provides details of one fatality, the Total Case Incidence Rate (TCIR) and the Days Away, Restricted or Transferred (DART) Case Rate. The Data Performance Table in Appendix A of the Sustainability Report provides the results for 2017, 2018 and 2019 for comparison purposes. All workers under the control of Fluor or a joint venture partnership are included in the rates.

Over the years, Fluor has found that hand injuries occur at a higher rate than many other injuries. Significant emphasis has been placed on a hand injury management program to address this issue.

In addition, Fluor has performed an in-depth analysis of injuries and their severities and identified Life CriticalSM operations:

- Hazardous energy control
- Excavation, trenching, and shoring
- Confined space entry
- Motorized heavy equipment
- Loading and unloading material
- Electrical work safety
- Cranes and rigging basics
- Motor vehicle operations
- Working at height

There is special safety training for these specific areas. Refer to GRI 403: Occupational Health and Safety 403-2 for details on eliminating work-related hazards using the hierarchy of controls.

Refer to GRI 403: Occupational Health and Safety 403-9.

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<th>103-1</th>
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<td>The company’s highly skilled, diverse workforce of 46,980 employees helps create a workplace environment that builds strong internal and external relationships in order to serve clients across many industries and geographies. Providing ample training and educational opportunities are keys to maintaining a skilled workforce.</td>
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Fluor provides ongoing training and development opportunities for both salaried and craft personnel, reinforcing its commitment to improving the lives of employees and increasing their skills. Leaders have tools to help them provide continual performance feedback and conduct career planning discussions. Managers encourage employees to cultivate skills that can enhance their professional growth and employability. A strong workforce with skills to serve the business benefits employees, their communities and the company.

Training and educational programs often end with quizzes to test employee comprehension of the topic. Surveys are available for employees to give feedback on ways to improve courses. Additionally, employees engage in an annual performance assessment with their manager. Employees are encouraged to discuss with their managers the training they need to achieve their goals and express their desires for additional training, if necessary.

Refer to 2019 Sustainability Report, pp. 24-25.
Fluor provides many internal and external opportunities for employees to learn and improve their skills. Employees can access the company’s online training portal, Fluor University®, which provides 24/7 access to self-paced, virtual training across a broad array of topics, including leadership, communications and teamwork. Additionally, discipline-specific, instructor-led courses are listed in the online catalog. Employees can sign up for these courses voluntarily, and managers can assign classes to employees to help ensure they get the training they need in their chosen fields.

In 2019, managers and supervisors completed performance assessments for 98.5 percent of the company’s total salaried population. One aspect of the annual review is a career planning discussion, which is designed to determine the best path for employees making progress in their professional development.

Fluor values a diverse workforce as a competitive advantage. The company uses a variety of avenues to attract talent. Fluor attends job networking events, such as local, regional and national job fairs, including those that promote job opportunities for military personnel, underrepresented job candidates, new college graduates and experienced professionals. Fluor’s regional representatives attend career fairs to attract talent based on labor needs in the region. Company representatives also play active roles in the community to ensure Fluor maintains a positive and strong local presence.

Fluor calibrates compensation to meet local market standards and comply with legal requirements, such as minimum wage laws. The focus is on creating fair compensation for all employees. The company considers factors such as business need, economic conditions, individual job responsibilities and personal performance when determining compensation. Fluor has an orderly system for establishing and maintaining both an equitable means of compensating employees and policies and practices that prohibit discrimination based on a number of factors, including gender.

Fluor monitors employee engagement surveys, feedback from exit interviews and complaints to gauge success in maintaining a healthy and diverse workforce.

Fluor publishes information about the board of directors in its annual Proxy Statement. In 2019, the board, consisting of 12 members, was 83 percent male. All board members are over 50 years old.

Fluor gathers information on the diversity of its workforce. All individuals within the company are included in the data, with the data points helping Fluor understand and manage resources. For information on Fluor’s global workforce and its diversity, refer to GRI 102: Organizational Profile 102-8.

Fluor has an orderly system for establishing and maintaining both an equitable means of compensating employees and policies and practices that prohibit discrimination based on a number of factors, including gender.

The company has policies and procedures that enable the human resources team to recruit, hire, develop and retain employees based on job-related specifications, including experience, qualifications and other criteria. All leaders, managers, supervisors and employees are expected to maintain an environment free from any form of unlawful discrimination and harassment. Managerial and supervisory training courses include company and location-specific requirements.

See the section of Fluor’s Code of Business Conduct and Ethics titled Treating Your Fellow Employees Fairly for more information.

The company offers all employees required and elective courses on business conduct and diversity and inclusion. It also defines expected conduct in its policies, procedures and practices to encourage respectful behavior among employees.
## REPORTING REQUIREMENTS

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In all of its global locations, the company uses a variety of avenues to attract talent. Fluor attends job networking events, such as local, regional and national job fairs, including those that promote job opportunities for military personnel, underrepresented job candidates, new college graduates and experienced professionals.

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### Reporting Requirements

The company also employs an open-door policy to foster direct communication between employees and management. Employees may discuss any concerns with their immediate supervisors or may contact their office or project employee relations representatives at any time.

Refer to GRI 406: Non-discrimination 103-1.

**Overview**

Fluor believes that a collaborative work environment benefits all parties, including employees, clients and shareholders.

The company acknowledges employees’ legal rights to choose whether or not to join third-party organizations without fear of retaliation, coercion or harassment. These rights are in accordance with applicable laws related to third-party involvement, which may include labor unions and/or trade unions in countries where Fluor employees work. Fluor managers and employees receive instruction and periodic training about these rights.

Approximately 4.5 percent of Fluor’s U.S. workforce is covered by collective bargaining agreements; however, this percentage fluctuates as the project-based workforce changes. Fluor does not collect and aggregate global data on specific operations or suppliers who violate or place at significant risk collective bargaining or the right to freedom of association.

Data are not included for privileged, proprietary and/or competitive reasons.

Fluor is committed to fostering an environment that recognizes and supports all aspects and dimensions of human rights. Fluor does not tolerate the use of forced labor.

Fluor projects and offices worldwide are subject to laws and regulations prohibiting the hiring of underage employees, and the company’s policies and practices are consistent with such laws. The company has internships, apprenticeships and other related programs designed to comply with hiring and compensation laws and regulations. The company neither allows nor supports child labor in any way.

Fluor follows standard requirements in all countries where it operates to ensure compliance with local laws and regulations regarding age requirements for workers.

The company has had no child labor incidents and does not believe any of its operations are at significant risk for an incident or violation.

Fluor is committed to fostering an environment that recognizes and supports all aspects and dimensions of human rights. Fluor does not tolerate the use of forced labor.

Fluor does not promote, condone, practice or tolerate the use of forced or compulsory labor, human trafficking or the sale of sexual acts of any kind, and the company’s policies and practices reflect this position.

The company adheres to all applicable local laws and regulations regarding forced or compulsory labor, including those related to wages and benefits.

Although Fluor does not publicly report incidents or violations, the company has no knowledge of any significant risks for compulsory or forced labor incidents in its operations or in the operations of its suppliers and subcontractors.
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### GRI 410: Security Practices

#### 103-1 Explanation of the material topic and its boundary
Fluor is strongly committed to a workplace free from violence, threats of violence, harassment and/or any other disruptive behavior.

#### 103-2 The management approach and its components
The company has established programs that promote the highest standards of employee safety and security. This includes a zero-tolerance policy that prohibits actual or threatened violence by employees against coworkers, visitors or others while performing their duties. Where applicable, Fluor takes the necessary steps to train its security personnel on company policies and procedures relating to human rights issues and familiarize them with potential concerns that may be relevant to company operations globally.

Incidents received through the hotline are used to measure effectiveness and refine procedures when necessary.

Refer to GRI 410: Security Practices 103-1.

### GRI 411: Rights of Indigenous Peoples

#### 103-1 Explanation of the material topic and its boundary
Fluor is strongly committed to maintaining the rights of indigenous peoples. Indigenous peoples may be employed in Fluor’s offices as engineers, scientists and support staff.

#### 103-2 The management approach and its components
As employees, indigenous peoples would have the national and local employment protections afforded all employees, as well as coverage by Fluor’s human resources policies. On the project sites, the clients have the lead in working with indigenous peoples.

Evaluation is based on adherence to national and local laws and Fluor human resources policies. Reports delivered through the hotline may also be used.

Fluor has no knowledge of any significant risks for violations of the rights of indigenous peoples in its operations or in the operations of its suppliers and subcontractors.

### GRI 412: Human Rights Assessment

#### 103-1 Explanation of the material topic and its boundary
The belief that all individuals should be treated with dignity and respect is firmly rooted in Fluor’s core value of integrity. Fluor is committed to fostering an environment that recognizes and supports all aspects and dimensions of human rights.

#### 103-2 The management approach and its components
Fluor’s Code of Business Conduct and Ethics, known as the Code, for employees and Fluor’s Business Conduct and Ethics Expectations for Suppliers and Contractors provide guidance on human rights and child and forced-labor prohibitions. Employees are required to certify compliance with the Code annually, and training is offered to employees on human rights issues.

Fluor encourages employees and other stakeholders to report any activities not in compliance with the company’s human rights and fair labor practices and provides reporting mechanisms, including an anonymous, toll-free Compliance and Ethics Hotline. More information on Fluor’s ethics and compliance policies, practices and hotline can be found in the Ethics and Compliance section of the 2019 Sustainability Report and in Fluor’s Modern Slavery Act Statement.

This information is not available. Fluor is not aware that any of its operations have been subject to human rights assessments.

All Fluor employees are required to complete ethics training annually.

This is not tracked. However, Fluor enters into joint venture relationships with the expectation that all parties hold similar core values.
GRI STANDARD DISCLOSURE

GRI 413: Local Communities

103-1 Explanation of the material topic and its boundary

Fluor’s management approach to indirect economic community impact includes engaging with local communities, governments and municipalities to address project-related social, economic and environmental concerns. These engagements are directed by project managers and conducted jointly with the company’s clients and partners. They take place in a variety of ways, including face-to-face meetings, attendance at conferences, employee participation on local boards and involvement with issue-specific campaigns.

103-2 The management approach and its components

Refer to GRI 413: Local Communities 103-1.

103-3 Evaluation of the management approach

Fluor’s evaluation of its indirect economic community impact is done at the individual project level. There is no company-wide database that tracks significant infrastructure investments and services or indirect economic impacts across the company due to the large number and disparate nature of projects in multiple markets. Fluor invests in community-building strategies and programs that strengthen society and encourage lasting change. The company supports youth programs and initiatives that develop leadership skills, build character and resiliency, provide job training and construct or refurbish affordable housing and community-serving facilities.

GRI 414: Supplier Social Assessment

103-1 Explanation of the material topic and its boundary

Fluor is proud of its long-standing Supplier Diversity Program, which has three pillars: environmental stewardship, economic growth and social progress. Fluor also supports the U.S. government’s goals and standards regarding small, minority and women-owned businesses.

Fluor’s Supplier Diversity Program does the following:

- Contributes to economic growth
- Enables Fluor to help create local jobs
- Enhances, refines and promotes growth of diverse businesses
- Inspires community dialogue
- Makes a positive impact on local economies

103-2 The management approach and its components

Fluor proactively identifies new and diverse potential suppliers through research and participation in trade fairs, workshops, business recruitment conferences and conventions and small and minority business opportunity days, as well as works with national and regional diversity councils and the U.S. Small Business Administration.

Fluor maintains subcontractor and supplier information through its Supplier and Contractor Online Registry, which tracks all new suppliers for appropriate classifications and certifications.

103-3 Evaluation of the management approach

In 2019, Fluor spent approximately $917 million with U.S. small, minority and women-owned businesses or approximately 18 percent of the $5.2 billion spent with U.S.-based suppliers and subcontractors.
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Fluor has diverse operations, a large number of ongoing projects, decentralized sustainability management among business lines and differing roles on projects where responsibility for stakeholder engagement, environmental and/or social impacts is shared with a client or there is no direct responsibility for Fluor. This arrangement limits Fluor’s ability to offer detailed reporting on the topic as required by GRI Standards.

Refer to 2019 Sustainability Report, pp. 18-19.

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GRI 419: Socioeconomic Compliance
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419-1 Non-compliance with laws and regulations in the social and economic area
All Fluor subcontractors and suppliers are required to comply with **Fluor’s Business Conduct and Ethics Expectations for Suppliers and Contractors**, which addresses, among other areas:

- Bribery and trade controls
- Conflicts of interest
- Financial and operational controls
- Health, safety and environmental stewardship
- Human rights and employment practices

Fluor does not measure negative social impacts in the supply chain.

Public policy and political activities conducted by or on behalf of Fluor are managed by the Company’s Government Relations department. Government Relations reports not less than annually to the Governance Committee of the Board of Directors, which is responsible for reviewing and making recommendations regarding the Company’s practices related to political contributions and policy activities. This review structure helps us focus the Company’s efforts on those public policy issues and political activities most relevant to the long-term interests of the enterprise overall and to our clients and shareholders.

Safety is one of Fluor’s core values. The company holds sacred the well-being of people, including employees, clients and the communities in which they work and live.

In 2019, workplace safety regulatory agencies issued one notice of non-compliance and one stop work notice to Fluor at two different locations. The citation was related to rigging requirements during lifting operations and resulted in a financial penalty. This citation and subsequent penalty is being contested. The stop work notice resulted from a routine inspection that found barricading inadequacies for work being conducted near the water’s edge.
TOPIC DISCLOSURE

ACCOUNTING METRIC RESPONSE

Environmental Impacts of Project Development IF-EN-106a.1

Number of incidents of non-compliance with environmental permits, standards, and regulations Refer to GRI 307: Environmental Compliance 307-1

Workforce Health & Safety IF-EN-320a.1

(1) Total recordable incident rate (TRIR) and (2) fatality rate for (a) direct employees and (b) contract employees

2019 TRIR (per 200,000 hours)
Direct Hire = 0.40
Contractors = 0.29

2019 Fatality Rate (per 200,000 hours)
Direct Hire = 0.00 (no direct hire fatalities)
Contractor = 0.002 (single fatality in 2019)

Business Ethics IF-EN-510a.2

Total amount of monetary losses as a result of legal proceedings associated with charges of (1) bribery or corruption and (2) anti-competitive
Refer to GRI 205: Anti-corruption 205-3
Refer to GRI 206: Anti-competitive Behavior 206-1

Business Ethics IF-EN-510a.3

Description of policies and practices for prevention of (1) bribery and corruption and (2) anti-competitive behavior in the project bidding processes
Refer to GRI 205: Anti-corruption 205-2
Refer to GRI 206: Anti-competitive Behavior 103-2

APPENDIX A – SASB DISCLOSURES

The Sustainability Accounting Standards Board (SASB) standards help companies and their investors communicate on several sustainability-related topics. The SASB standards can be used alongside other sustainability reporting frameworks, such as the GRI table in this document, to communicate additional information to investors in a defined manner.

In 2020, Fluor has made the decision to adopt SASB reporting standards for future reports and is in the process of determining the materiality of the recommended disclosures. The table below is a selection of disclosures that have already been identified as relevant disclosures such that a complete report can be made in the 2020 disclosure tables. All accounting metrics were taken from the Engineering and Construction Services Sustainability Accounting Standards.

<table>
<thead>
<tr>
<th>TOPIC</th>
<th>DISCLOSURE</th>
</tr>
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<tbody>
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<td>Environmental Impacts of Project Development</td>
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</tr>
</tbody>
</table>
### DISCLOSURES

Companies and their investors communicate on several sustainability-related topics. The SASB standards can be used in this document, to communicate additional information to investors in a defined manner.

Fluor is in the process of determining the materiality of the recommended disclosures. The table below that can be included in this 2019 report. Over the course of 2020, Fluor will continue to further define other material tables. All accounting metrics were taken from the Engineering and Construction Services Sustainability Accounting Standards.

#### ACCOUNTING METRIC

<table>
<thead>
<tr>
<th>ACCOUNTING METRIC</th>
<th>RESPONSE</th>
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<td>Number of incidents of non-compliance with environmental permits, standards, and regulatory violations</td>
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<tr>
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