

Getting things right.

safety,
integrity,
teamwork,
excellence

BUSINESS CONDUCT AND ETHICS EXPECTATIONS FOR SUPPLIERS AND CONTRACTORS

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

Fluor is a signatory to the U.N. Global Compact. Fluor will do business only with others who share our values of safety, integrity, teamwork, and excellence, and the values expressed within the Global Compact. Our suppliers and contractors are expected to do what is necessary to understand and comply with these expectations and, in turn, require their suppliers and subcontractors to conform as well. Our mutual success and continuing business relationships depend on it.

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We reserve the right to verify that a supplier or contractor's business operations meet these expectations. **Failure to act in a manner consistent with these expectations may impede our ability to do business together in the future.**

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

Health, Safety & Environmental (HSE)

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

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

Human Rights and Employment Practices

The welfare of the workers of our suppliers and contractors is critical to Fluor successfully performing our work. We are a member of Building Responsibly whose purpose is to serve as the global standard on worker welfare for the engineering and construction industry. Our suppliers and contractors are expected to comply with the principles of [Building Responsibly](#) and to:

- ▶ Pay employees a living wage and expect the same from their supply base
- ▶ Support and respect human rights and avoid complicity in human rights abuses, including avoiding the use of conflict minerals
- ▶ Perform work without the use of forced, debt-bonded, indentured, trafficked, or child labor
- ▶ Never use force, fraud, coercion, or misleading practices during the recruitment of employees or offering of employment
- ▶ Treat all their workers with dignity, respect, and fairness
- ▶ Conduct all their operations in a socially responsible, non-discriminatory manner in the spirit of the ILO Declaration on Fundamental Principles and Rights at Work and in accordance with applicable laws including those associated with working hours, wages and benefits, equal opportunity, harassment-free work environment, freedom of association, and data privacy



Sustainability

Fluor's sustainability mission envisions meeting the needs of our clients while conducting business in a socially, economically, and environmentally responsible manner to the benefit of current and future generations, thereby creating value for all stakeholders. Every day, Fluor helps our clients safeguard the environment, conserve energy, protect lives, and strengthen the economies and social structures of communities in which our employees work and live. At Fluor, leadership in sustainability is more than just a responsibility; it is a privilege.

Our suppliers and contractors are expected to:

- ▶ Embrace diversity in their supply base by utilizing women business enterprises, minority business enterprises, LGBTQ business enterprises, veteran business enterprises, service disabled veteran business enterprises, historically underutilized business (HUB) enterprises, Aboriginal business enterprises, and the Small Business Administration's (SBA) defined small business enterprises, along with other similarly situated enterprises
- ▶ Commit to, select, and utilize suppliers and subcontractors who embrace, practice, and conduct their business in a socially, economically, and environmentally responsible manner
- ▶ Partner with Fluor to collaborate on sustainability improvements that benefit our clients, Fluor, and the communities in which we work and share the knowledge gained with their supply base so that they can benefit from sustainability best practices and implement them

Conflict Minerals

Fluor is committed to offering products that do not contain so called conflict minerals (i.e., tin, tantalum, tungsten, and gold) that have been sourced from mines that support or fund conflict within the Democratic Republic of Congo or adjoining countries. In that regard, we expect our suppliers to:

- ▶ Exercise due diligence to investigate the source of any conflict minerals
- ▶ Respond in a timely manner to our requests for information regarding their source of conflict minerals
- ▶ Only supply Fluor with products and materials that originate from conflict-free sources

Financial and Operation Controls

Our suppliers and contractors are expected to:

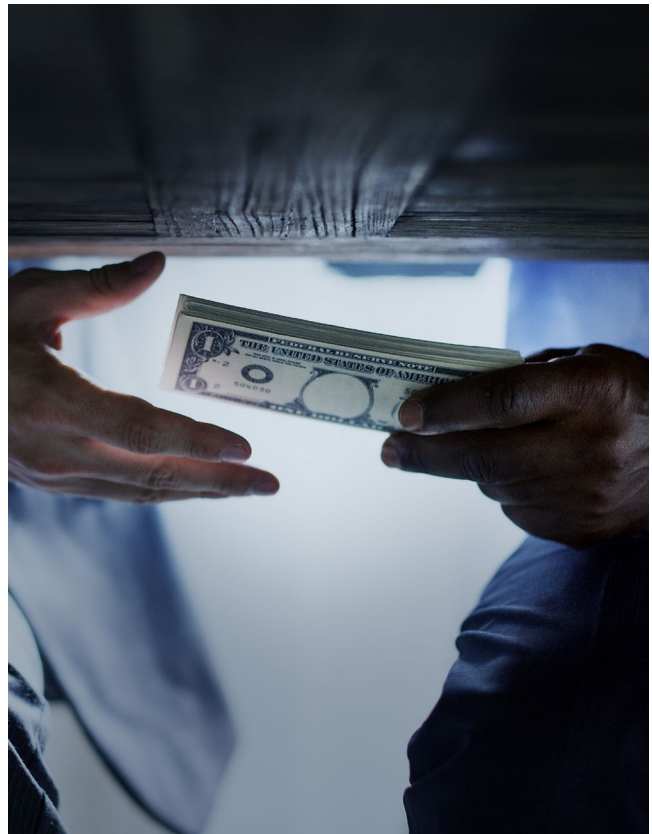
- ▶ Keep accurate, complete, fair, timely, transparent, and understandable financial and operational books, records, and accounts and a system of effective internal controls
- ▶ Create, retain, and dispose of business records in accordance with applicable legal and contractual requirements
- ▶ Keep accurate and complete records prepared for Fluor, including records of work time and expenses
- ▶ Protect nonpublic information relating to Fluor
- ▶ Comply with insider trading laws including the prohibition against buying or selling securities or advising (e.g., tipping) others to buy or sell securities while aware of material, nonpublic information relating to Fluor

Trade Controls

Our suppliers and contractors are expected to:

- ▶ Know and comply with the export controls, economic sanctions, import customs, and anti-boycott laws applicable to their work with and for Fluor
- ▶ Never participate in boycotts or other restrictive trade practices prohibited or penalized under United States or applicable local laws

- ▶ Provide accurate commodity jurisdiction and classification information for supplier-provided materials, equipment, technology, and technical data
- ▶ Disclose to their Fluor Supply Chain representative any apparent conflict between U.S. and applicable local law requirements, such as the laws blocking certain U.S. restrictions adopted by Canada, Mexico, and the members of the European Union



Anti-Bribery and Corruption

Fluor maintains zero tolerance for bribery and expects our suppliers and contractors to do the same. Bribery is directly or indirectly giving or promising to give anything of value to improperly influence actions of a third party. Bribes may include money, gifts, travel or other expenses, hospitality, below-market loans, discounts, favors, business opportunities, political or charitable contributions, or any direct or indirect benefit or consideration. We expect suppliers and contractors to remain in compliance with all relevant anti-corruption laws in addition to Fluor's contract terms and conditions related to anti-bribery and corruption.

Conflicts of Interest, Gifts, Entertainment, and Business Courtesies

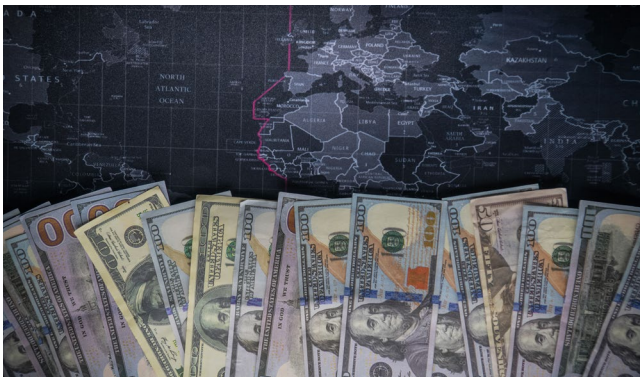
Our suppliers and contractors, their employees, and their family members must not receive improper benefits through their relationship with Fluor or allow other activities to conflict with acting in the best interests of Fluor. Our suppliers and contractors are expected to:

- ▶ Limit promotional items and entertainment involving our employees to reasonable business courtesies, within accepted business practices and never with the intent to improperly influence a business decision or create a potential conflict of interest or the appearance of impropriety
- ▶ Disclose any potential conflict of interest or contractual business relationship with Fluor employees and family members to their Fluor Supply Chain representative for review prior to entering into any business transaction

Competing Fairly

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

- ▶ Compete honestly and fairly
- ▶ Comply with applicable antitrust and competition laws
- ▶ Never participate in anti-competitive practices such as price fixing or bid rigging



Money Laundering Prevention

Our suppliers and contractors are expected to follow applicable laws that prohibit money laundering and require the reporting of cash and other suspicious transactions related to Fluor contracts to their Fluor Supply Chain representative.

Lobbying

In many countries, strict rules govern lobbying activities. Lobbying requires disclosure to the government and covers many kinds of activities, including but not limited to:

- ▶ Contact with legislators, regulators, executive branch officials, or their staff
- ▶ Making or negotiating sales for government contracts
- ▶ Efforts to influence legislative or administrative action

In certain countries, lobbyists must be registered. We expect our suppliers and subcontractors to comply with applicable lobbying laws and regulations.

Company Resources

Fluor's resources include property, assets, intellectual property, and confidential and/or private information. Our suppliers and contractors are expected to:

- ▶ Safeguard our resources utilized in the course of performing work and use such resources solely for legitimate business purposes to advance the interest of Fluor
- ▶ Honor the intellectual property rights of Fluor, our clients, and partners at all times
- ▶ Maintain, handle, and process any confidential information on a need-to-know basis, with appropriate technical and organizational controls and in accordance with applicable law
- ▶ Vigilantly oversee every effort to ensure that any possible phishing, hacking, malware attack, or other cyber-security threat identified during the course of business with Fluor is timely addressed and rectified and, where a data breach has occurred, immediately notify Fluor
- ▶ Comply with all commercial instructions found in purchase orders and contracts, which are designed to minimize the risks and occurrences of fraud (e.g., bank payment instruction changes, company name changes, payment terms changes, etc.)

Government Work

Our suppliers and contractors who work on projects where government entities or agencies are involved are expected to understand and follow government contracting rules, regulations, and procedures.

Reporting Concerns

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

- ▶ Their Fluor Supply Chain representative
- ▶ Fluor's Chief Procurement Officer Raj Desai at procurement@fluor.com or +1.281.263.1000
- ▶ Fluor's Compliance and Ethics Integrity Portal at <https://fluorintegrity.com> or by telephone at +1.720.514.4400

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

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Speak up and
make misconduct
disappear.

unethical
unethical
unethical
unethical
unethical
unethical
ethical

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

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