

A summary of Fluor's
**Code of Business Conduct
and Ethics**
for craft employees.

INTRODUCTION

FLUOR HAS ALWAYS BEEN DETERMINED TO DO THE RIGHT THING. We are committed to the highest standards of conduct. This commitment is vital to Fluor and your success on this or any future Fluor project.

This summary describes the parts of Fluor's Code of Business Conduct and Ethics that apply most directly to you as a craft employee at Fluor and its subsidiaries ("Fluor"). You may review the complete Code at www.fluor.com or receive a print copy from Human Resources. You are responsible for understanding and complying with our entire code.

SAFE AND SECURE WORKPLACES

Safety is Fluor's first core value. We want to be known as an innovator in workplace safety – a company that promotes a culture of caring and leads the way in the development and implementation of best practices. As such, the health and safety of personnel associated with our work is integrated into the way we do business. We will provide you with health, safety, and environmental (HSE) information, which may include handbooks and training appropriate to your job. In addition, our company will provide you with equipment and materials that meets and in many cases exceeds legally required safety regulations.

You are responsible for following HSE and security policies and site-specific requirements to help make the workplace safe for everyone. If you are uncertain about HSE or security procedures or rules, have concerns about the materials or the equipment you work with, or are aware of an HSE or security violation, contact your HSE manager, supervisor or Human Resources representative. Fluor gives you the authority and responsibility to halt a task or operation when a hazard, unsafe act, unsafe condition, or concerns/questions related to control of HSE risk(s) exist.

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

EQUAL EMPLOYMENT OPPORTUNITY AND HARASSMENT-FREE WORK ENVIRONMENT

Fluor will not make employment decisions such as hiring, promotion, discipline and termination based on a person's gender, race, color, religion, national origin, marital status, pregnancy, age, disability, veteran status, sexual orientation, or any other legally protected status. We strive to create a work environment that is free from harassment, where employees can work in a safe and professional atmosphere, where merit and competence are vital, and diversity and trust are promoted.

As you would like to be treated with dignity and respect regardless of your gender, race, color, religion, national origin, marital status,

pregnancy, age, disability, veteran status, or sexual orientation, we expect you to treat all employees equally and fairly as well. Discriminatory or offensive gestures, jokes, slurs or other remarks or forms of harassment that create an offensive work environment will not be tolerated.

PROTECTING CONFIDENTIAL EMPLOYEE INFORMATION

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

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

This policy is not intended to prohibit employees from discussing their own wages or terms and conditions of employment with others.

CONFLICTS OF INTEREST

A conflict of interest may arise when your personal, social, financial or political activities have the potential of interfering with your loyalty and objectivity to our company.

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

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

A "close family member" is any person closely connected to an employee by blood, marriage or close affinity (e.g., a spouse, significant other, sibling, grandparent, brother-in-law, etc.) such that impartiality might be perceived to be affected by the relationship. This term also applies to a domestic partner and the domestic partner's child, parent, sibling, half-sibling, grandparent, grandchild or stepparent.

Notify Human Resources or designee immediately if you are supervising or asked to supervise a close family member or friend.



If you feel you may have a conflict of interest, you must talk to your supervisor or your site Human Resources representative for clarification. Conflicts of interest may often be resolved if they are disclosed promptly.

COMPANY INFORMATION AND RESOURCES

We expect you to know and follow the Company procedures that apply to your particular job. For example:

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

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

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

ANTI-BRIBERY AND CORRUPTION

Fluor will not tolerate bribery in any form. Offering, promising, giving, demanding or accepting bribes is prohibited. Never attempt to sell Fluor jobs by offering or accepting money, gifts, services or personal favors to get applicants hired by Fluor. Never offer or accept money, gifts, services, or personal favors from vendors or suppliers in exchange for doing your job or not doing your job to give the vendor or supplier an advantage in their relationship with Fluor.

You must not bribe or make payoffs to anyone, including your supervisors. Likewise, supervisors or any other co-workers must not request or accept bribes or payoffs from you or anyone else. In addition, you may not accept anything of more than nominal value from anyone with whom Fluor does business, including our clients, suppliers or contractors.

REPORTING SUSPECTED VIOLATIONS OF LAW OR POLICY

It is essential that every employee follows the law and company policies. Any concern about noncompliance should be reported immediately to protect us all. Our company will not tolerate retaliation against any

employee who, in good faith, raises concerns about compliance and ethics issues, reports suspected noncompliance, or cooperates with a company investigation.

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

GETTING HELP

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

WHERE TO REPORT YOUR CONCERN

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

- ▶ Your site Human Resources representative or Industrial Relations representative
- ▶ Your supervisor's supervisor (and escalate further up the reporting structure, as necessary)
- ▶ Fluor's Compliance and Ethics Integrity Portal & Hotline
- ▶ Compliance and Ethics at ethics@fluor.com or if you are an employee in the Mission Solutions business group at fggcompliance@fluor.gov.com

Retaliation Will Not Be Tolerated

Fluor prohibits retaliation of any kind against an individual who reports suspected misconduct in good faith.





Speak up and
make misconduct
disappear.

unethical
unethical
unethical
unethical
ethical

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

FLUOR'S COMPLIANCE AND ETHICS INTEGRITY PORTAL & HOTLINE

You may contact the Compliance and Ethics Integrity Portal & Hotline by phone at 1.800.461.9330 (inside the United States) or collect at 1.720.514.4400 (outside the United States) or online at www.fluorintegrity.com. The Integrity Portal & Hotline is operated 24 hours a day, 7 days a week, by a third-party company that reports the information you provide to Fluor. Reports may be made in more than 300 languages. In certain European countries, local law may prohibit anonymous reporting.

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