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ENERGY  
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# Bechtel's Expectations for Suppliers' and Subcontractors' Conduct

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# Bechtel's Expectations for Suppliers' and Subcontractors' Conduct

Bechtel works only with qualified suppliers and subcontractors who commit to safely and responsibly deliver quality goods and services—on time and within budget. Although quality, cost, and timeliness are important, we will not solicit and award purchase orders and subcontracts to suppliers and subcontractors that do not meet our standards for safety, ethics, conduct, and protection of human rights. Bechtel is committed to the highest safety, ethical, and human rights standards in the industry, and we expect the same dedication from our supplier and subcontractor organizations.

Our suppliers and subcontractors must comply with all terms of the purchase order and/or subcontract and will immediately notify Bechtel of any actual or potential violations. To the extent that the purchase order or subcontract does not contain specific requirements that append or modify the below, we expect our suppliers and subcontractors at all tiers of performance to commit to the following:

## Compliance with Laws and Regulations

Our suppliers and subcontractors must be familiar with and follow all applicable laws and regulations at all times in the performance of the work. Our suppliers and subcontractors must also ensure that lower-tier suppliers and subcontractors give an identical representation in their subcontracts and purchase orders for any portion of the work. "Laws" include all applicable national, federal, state, and local laws, ordinances, and regulations of the United States of America and any other national or international laws with jurisdiction that cover the work.

## Anti-Corruption Compliance

Bechtel is committed to full compliance with all domestic and international anti-bribery laws, regulations, and conventions that prohibit corrupt actions in obtaining or retaining business or obtaining any other improper business advantage. In addition, Bechtel policy prohibits making facilitating payments of any kind, that is, payments to secure or expedite the performance of routine government actions. Bechtel will not condone or tolerate suppliers or subcontractors engaging in or not reporting behavior that violates, or has the potential to violate, the standards set forth in the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act of 2010, or any other relevant anti-corruption laws.

## Conflict Minerals

Although Bechtel is not a manufacturer and is a privately held company, we expect our suppliers to adhere to Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, which aims to prohibit the use of conflict minerals (gold, tungsten, tantalum, and tin) from the Democratic Republic of the Congo or adjoining countries. Suppliers shall conduct due diligence to preclude the sales or installation of any materials or equipment that contain conflict minerals.

## Data Protection

Bechtel recognizes and respects the privacy of the individuals whose personal information it collects, uses and otherwise processes in the course of its business. Our suppliers and subcontractors must comply with all applicable data protection and privacy laws and regulations in the performance of the work, including the EU Data Protection Directive 95/46/EC (GDPR), and must enter into a data processing agreement when requested by Bechtel or required by law. Our suppliers and subcontractors must also ensure that lower-tier suppliers and subcontractors give an identical representation in their subcontracts and purchase orders for any portion of the work and enter into a data processing agreement when requested by Bechtel or required by law. "Laws" include all applicable national, federal, state, and local laws, ordinances, and regulations of the United States of America and any other national or international laws with jurisdiction that cover the work or personal data that is collected, processed or disclosed in connection with the work.

## Equal Opportunity

Bechtel is an equal opportunity employer and employment decisions are made without regard to race, color, gender, age, religion, national origin, ancestry, physical or mental disability, veteran status, sexual orientation, gender identity, caste, and other grounds for discrimination prohibited by applicable law. Bechtel expects that suppliers and subcontractors will have employment policies and practices that prohibit employment decisions being made with regard to any legally protected characteristics.

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For work performed in the United States, and to the extent the supplier or subcontractor is not otherwise exempt, the suppliers and subcontractors must abide by the requirements of 41 CFR §§ 60-1.4(a), 60-300.5(a), and 60-741.5(a). These regulations prohibit discrimination against qualified individuals based on their status as protected veterans or individuals with disabilities, and prohibit discrimination against all individuals based on their race, color, religion, sex, sexual orientation, gender identity, or national origin. Moreover, these regulations require that the covered parties take affirmative action to employ and advance individuals in employment, without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, protected veteran status, or disability.

## Ethics

Bechtel is committed to the highest standards of ethical conduct and seeks to do business only with suppliers and subcontractors who share these values. We conduct our business transactions fairly, properly, and impartially and expect the same from our suppliers and subcontractors. Any conduct that fails to meet our standard of ethics, integrity, and responsible conduct may preclude suppliers and subcontractors from being invited to participate in a solicitation.

## Human Trafficking and Anti-Slavery

Bechtel is committed to respecting all human rights everywhere we operate, consistent with Bechtel's Vision, Values and Covenants and the spirit and intent of the United Nations Guiding Principles on Business and Human Rights. To that end, Bechtel will not tolerate or condone any activities that support human trafficking, slavery, servitude, or forced or compulsory labor. We expect our suppliers and subcontractors to obey the laws that require them to treat workers fairly and provide a safe and healthy work environment. Bechtel expects suppliers and subcontractors to adhere to these standards, and expects them to hold their own suppliers and subcontractors to the same standards. In addition, Bechtel expects suppliers and subcontractors to:

- Employ workers at or above the applicable minimum age requirement.
- Maintain a workplace free from threats of violence, physical abuse, or other conduct that fails to respect the safety and dignity of a worker.
- Comply with applicable wage laws and, upon end of employment, pay for return transportation costs for workers recruited from outside the country.
- Not charge workers recruitment fees or utilize firms charging workers such fees, and not utilize fraudulent or misleading recruitment practices.
- Not withhold a worker's passport or immigration documents.
- Provide workers a process for escalating and reporting concerns without retaliation.

We fully expect that our suppliers and subcontractors will ensure that lower-tier suppliers and subcontractors give an identical representation in their subcontracts and purchase orders for the performed work.

## Import/Export

Throughout the supply chain, our suppliers and subcontractors must comply with all applicable export and import laws and regulations, including the international sanctions programs administered by the U.S. Department of Treasury as well as any other applicable government agency in the U.S. or abroad.

## Restricted Parties

All suppliers and subcontractors must acknowledge that the U.S. Government, other country governments, and international organizations publish Restricted Parties Lists ("Lists") that identify parties (such as known or suspected terrorists, money launderers, and drug traffickers) restricted from certain or all types of transactions. Our suppliers and subcontractors must review such Lists prior to initiating transactions with any lower-tier or subcontractor, including financial institutions, for all or any portion of the goods or services to ensure such lower-tier or subcontractor and any relevant owners are not identified on any applicable Lists.

## Safety

Bechtel has a "Zero Accidents" policy at its construction sites. Our suppliers and subcontractors must comply with the site safety requirements of each Bechtel jobsite. At suppliers' facilities, suppliers must operate facilities in a safe manner to protect Bechtel personnel, its agents, and suppliers' employees at all times. In all locations, suppliers and subcontractors must provide a safe work environment in accordance with all applicable international and national laws, regulations, and standards.

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## Supply Chain Diversity

Bechtel is committed to a diverse workforce and a diverse supply chain. Within the United States, our suppliers and subcontractors must assist Small, Disadvantaged, Women-Owned, Veteran-Owned, Service-Disabled Veteran-Owned, and HUB Zone Business concerns to obtain business opportunities by identifying and encouraging not just within their own company but also the lower-tier supplier and subcontractor companies to participate to the greatest extent possible, consistent with their qualifications, quality of work, and obligations as may be required by 48 CFR 52.219-9 (subcontracting plan regarding small business concerns). For all work regardless of locations, our suppliers and subcontractors must strive to identify, source, develop, and otherwise assist local suppliers and subcontractors in performance of the work.

## Sustainability

We strive to lead the engineering and construction industry in designing and constructing facilities that are environmentally sound, are socially responsible, and leave a sustainable and positive impact on the local communities. We similarly expect our suppliers and subcontractors to develop work practices to adhere to safe work practices, mitigate adverse impact to the environment, develop local suppliers and subcontractors, and advance the economics of the local community.

## Lower-Tier Suppliers Throughout the Supply Chain

In addition to the above commitment, we expect our suppliers and subcontractors to secure the same commitment from lower tier suppliers and subcontractors. The above requirements are mandatory and reflect, in part, Bechtel's corporate values/ethics and social responsibility on such issues.