BECHTEL COMPLIANCE TRAINING PROGRAM

Bechtel's compliance curriculum is designed to assure that all employees in a given job family have the same basic competency in the substantive areas relevant to their jobs regardless of the business unit or location to which they are currently assigned. Courses are assigned based on the compliance risk level of a particular job family. More specialized instruction may also be required by an employee's base or assigned organization, based on the risk level of their specific job assignment. Employees in high-risk positions receive specialized training on an annual basis.

BU Course	Course Description	Required Audience[1]	Required	Languages[2]
ETH0002	Bechtel Business Ethics: Code of Conduct	New Hires	Onboarding only	A, C-S, C-Tr, E, Fr, P, Sp, T
ETH0003	Ethics Awareness Workshop	All Employees	Annual	A, C-S, C-Tr, E, Fr, Sp
ETH0006	Economic Trade Sanctions and OFAC	Procurement, Finance, L&RM, IA, HR, BBS & BEO	2 Years	A, E, Fr, Sp
ETH0007 (Basic Course)	Global Bribery and Corruption Awareness[3]	All Employees	2 Years	A, E, Fr, Sp
ETH0007-X (Tailored, Instructor Led Course)	Anti- Corruption Update - Refresher	High-risk position employees (including: senior leadership, business development, contracts and procurement, Legal, Internal Audit, and others designated as high-risk)	Annually	E
ETH0009 (Basic Course)	Export Controls: Commercial Products (BIS)	All employees except Project Management, Contracts, Engineering, Procurement, Legal & Risk Management (L&RM), Internal Audit (IA), Human Resources (HR), & Bechtel Equipment Operations (BEO)[5]	3 Years	A, E, Fr, Sp
ETH0010 (Basic Course)	Anti-Boycott: How to Handle Boycott Requests[4]	All Employees except Project Controls, ES&H, Quality, IS&T, Office Services, Administrative & Secretarial[6]	3 Years	A, E, Fr, Sp

BU Course	Course Description	Required Audience[1]	Required	Languages[2]
SC140 (Intermediate)	Export Control (Online or Instructor-led)	Project Management, Contracts, Engineering, Procurement, L&RM, IA, HR & BEO	3 Years	English only

[1] **Executive board members are subject to the same requirements as all employees. Non-executive board members receive periodic Bechtel Code of Conduct, conflict of interest, anti-corruption, and anti-bribery training.**

[2] Language Codes: Arabic (A), English (E), French (Fr), Portuguese (P), Spanish (Sp), Simplified Chinese (C-S), Traditional Chinese (C-Tr), and Thai (T).

[3] Acceptable Substitute: Instructor Led PM159 or Instructor Led ETH0001-X1

[4] Acceptable Substitute: Instructor Led PM161

[5] Acceptable Substitute: Instructor Led SC140

[6] Employees in Montreal and Chile who require instruction in French or Spanish may take the basic course.