

MODERN SLAVERY ACT STATEMENT 2019

OUR BUSINESS AND SUPPLY CHAIN

Fluor is one of the world's largest engineering, procurement, fabrication, construction, and maintenance companies. With headquarters in Irving, Texas, Fluor has approximately 47,000 employees worldwide. Fluor works with clients in diverse industries around the world to design, construct, and maintain complex and challenging capital projects. Fluor's supply chain comprises more than 15,000 suppliers from more than 60 countries delivering materials, equipment, and services to projects worldwide. This statement sets out the steps taken by Fluor¹ for the year ended December 31, 2019, to prevent modern slavery in our business and supply chain.

OUR COMMITMENT

For more than 100 years, Fluor has had an absolute determination to do the right thing. In all of our dealings, Fluor is committed to unyielding integrity and the highest standard of business conduct. This commitment is integral to Fluor's continued success, and we believe it positively impacts our diverse and worldwide suppliers, contractors, clients, employees, investors, and the communities where we do business. To learn more about

Fluor's commitment to sustainable business practices, our annual Sustainability Reports may be found at www.fluor.com/sustainability.

We are further committed to implementing and enforcing effective systems and controls to instill confidence that modern slavery does not exist in our supply chain. Fluor is committed, among other things, to the following standards:

- ▶ All workers, irrespective of their nationality, gender, ethnicity, social status, race, religion, or other protected characteristics, are treated fairly with regard to recruitment and employment practices. Further, the dignity of workers is protected and preserved, and inhumane treatment, abuse, and humiliating disciplinary action are not permitted.
- ▶ Forced, compulsory, bonded or indentured labor, human trafficking practices, child labor, or any other violations of human and labor rights according to local, national, or international standards are not tolerated.
- ▶ The use of misleading or fraudulent practices during recruitment of employees is not tolerated and charging recruitment fees to the employee is prohibited.
- ▶ A clean, secure, safe, and healthy working environment is provided.



4,000+
CLIENTS IN
60+ COUNTRIES

15,000+

SUPPLIERS IN
60+
COUNTRIES



47,000+
GLOBAL EMPLOYEES

2019
**WORLD'S MOST
ETHICAL
COMPANIES™**
WWW.ETHISPHERE.COM

13
CONSECUTIVE
YEARS

FORTUNE
WORLD'S MOST
ADMIRABLE
COMPANIES 2019

19
CONSECUTIVE
YEARS

5 NORTH AMERICA
CONSECUTIVE **DOW JONES**
YEARS SUSTAINABILITY INDEX



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FOUNDING
MEMBERS

¹This statement also includes steps taken by Fluor subsidiaries, including Fluor Limited and Fluor International Limited, as well as Stork Technical Services (RBG) Limited, whose boards approved this statement on January 17, March 10, and March 2, 2020 respectively.

- ▶ Worker accommodation standards contained in national and local regulations are considered as a baseline requirement.
- ▶ All workers have access to personal documentation and passports, and freedom of movement outside normal working hours is not restricted, unless there are legitimate safety or security issues that might threaten the health, safety, and well-being of the worker.
- ▶ Wage payments are made regularly and on time, consistent with applicable law.
- ▶ The legal rights of workers to choose whether or not to join third-party organizations, without fear of retaliation, coercion, or harassment, are acknowledged.
- ▶ A process is available for employees to report, without fear of retaliation, activity inconsistent with these commitments.

POLICIES AND CONTRACTUAL CONTROLS

Fluor clearly sets out our expectations in our Code of Business Conduct and Ethics (Code of Conduct) to which all employees are required to adhere. Additionally, Fluor's suppliers and contractors are expected to understand and comply with our Business Conduct and Ethics Expectations for Suppliers and Contractors (Supplier Expectations). These two policies address, among other issues, health and safety of workers, fair employment practices, and respect for the dignity of each person. They are both available at: www.fluor.com/sustainability/ethics-compliance.

Fluor's Code of Conduct and Supplier Expectations provide multiple avenues for our employees, and for our suppliers and contractors, to report any business conduct and ethics concerns, including human rights violations such as modern slavery. We take seriously any allegation that human rights are not properly respected. All reports are fully investigated, and appropriate remedial actions are taken. We have outlined our approach to handling complaints/concerns on our website at: <https://www.fluor.com/sustainability/ethics-compliance/compliance-ethics-hotline>.

ASSESSMENT OF MODERN SLAVERY RISK WITHIN OUR SUPPLY CHAIN

Fluor continuously assesses our operations and procurement activities to instill confidence that modern slavery does not exist in our supply chain. Because at any one time Fluor has, on average, 3,000 projects ongoing worldwide, each with its own supply chain, we employ a risk-based due diligence approach to those assessments. Thus, we focus primarily on projects in certain geographic locations, especially with limited local labor supply, and where low-skilled, third-country migrant labor is employed in construction and other services.

FURTHER STEPS TO PREVENT MODERN SLAVERY IN OUR SUPPLY CHAIN

As part of our contracting processes, we require our suppliers and contractors to follow our Code of Conduct and Supplier Expectations. We also expect that our suppliers and contractors hold their own suppliers to these same high standards.

In the Human Rights and Employment Practices section of our Supplier Expectations, we clearly set forth our expectation that our suppliers and contractors perform work without the use of forced, compulsory, bonded, or indentured labor, and that they never use misleading or fraudulent practices during the recruitment of employees or offering of employment. Our prequalification questionnaire form for all suppliers contains questions regarding policies and processes prohibiting forced labor and human trafficking, as well as convictions, legal actions, or allegations related to employing, engaging, or otherwise using forced labor, trafficked labor, or exploitative child labor.

Building on our continuous work to improve methods that Fluor's Supply Chain uses to prequalify suppliers of goods and services, in 2019 we continued the

successful Human Trafficking and Modern Slavery training and certification program for our Supply Chain personnel with over 1,300 supply chain employees completing the training. This training is intended to help those who engage directly with our suppliers and contractors to better identify and mitigate potential modern slavery risks. In 2020, that training will be extended to other functions within Fluor. We will also continue our employee awareness campaign on modern slavery, begun in 2017, which includes intranet articles, employee discussion topics, and messages for craft personnel at projects globally.

Fluor believes in the power of collective action, and we continue to emphasize the importance of collaboration with others to address the multifaceted challenges of worker welfare. In 2019, we assumed the Chair of Building Responsibly, a collaborative effort with nine other engineering and construction companies that addresses worker welfare issues. In that role, Fluor co-led the effort to draft the Building Responsibly Worker Welfare Guidance Notes. These Guidance Notes offer a substantive discussion of each Principle and suggest good practices for consideration when implementing the Principles, as well as a discussion of major challenges faced by companies. These Principles and Guidance Notes

serve as a global standard for worker welfare and are the foundation on which Building Responsibly will base its work. Fluor's commitment on worker welfare contained in this document is based on those Principles and Guidance Notes, and they can be found at the Building Responsibly website at: <https://www.building-responsibly.org/> as well as Fluor's website at <https://www.fluor.com/sustainability/ethics-compliance/worker-welfare>. To strengthen our commitment to fostering respect for human rights and worker welfare in our supply chain, we have incorporated specific reference to the Building Responsibly Principles and Guidance Notes into our Supplier Expectations, effective in 2020.

As in years past, in 2020, Fluor will continue our ongoing review of our sales, operations, procurement, and contracting activities and procedures and update them as appropriate. We will also continue to provide leadership in our industry in support of further improving worker welfare practices and eliminating modern slavery.



Carlos M. Hernandez
Chief Executive Officer