



Steven J. Demetriou
Chairman & CEO

Ms. Mariam Bhacker
Ms. Marti Flacks
Business & Human Rights Resource Centre
120 Wall Street
16th Floor
New York, NY 10005

March 6th, 2018

Dear Ms. Bhacker and Ms. Flacks,

Thank you for your letter of February 26. We are pleased to learn of the Business and Human Rights Resource Center's interest in our social impact activities.

Since its founding over 70 years ago, Jacobs has operated with a deep commitment to safety, ethics, and integrity, with people at the heart of our business. We aspire not only to deliver high-quality infrastructure, but to do so in a manner that promotes the health, safety, and welfare of the people and communities involved.

BeyondZero® is the name of Jacobs' safety program. Anchoring our "culture of caring," BeyondZero is about every one of us making safety a personal value that we live by each day. Not only do our employees work relentlessly to foster behaviors and conditions that produce an incident- and injury-free work environment, we go beyond this – with the ultimate goal of identifying and eliminating risks both on and off the job.

In addition to our own culture of caring, we seek to hold our suppliers, vendors, and subcontractors to the same standards that we hold ourselves. Jacobs' [Supplier Code of Conduct](#) details what we expect from those with whom we partner to meet our clients' needs. In addition to standards related to safety and ethics, our Supplier Code of Conduct includes provisions on human rights, requiring business partners to adhere to human rights laws, practices, and principles.

While we have strong systems in place, we consider the acquisition of CH2M an opportunity to enhance our human rights program even further. One of the most exciting aspects of our newly combined company is not only our tremendous capability when it comes to delivering innovative engineering solutions, but our synergistic values, culture, and shared commitment to having positive impact.

CH2M has indeed established itself as a thought leader when it comes to promoting worker rights and welfare in our industry. Beyond its own human rights policies and practices, CH2M has gone one step further to spark increased collaboration across the engineering and construction community at large. Its success in these efforts has been evidenced both in last year's launch of [Building Responsibly](#), as well as in CH2M being the only company in our industry shortlisted for the 2017 Thomson Reuters Foundation [Stop Slavery Award](#).

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Jacobs recognizes the significance of CH2M's leadership on human rights and has already begun working to harmonize the companies' programs, leveraging the strong groundwork established by CH2M. Organizationally, Jacobs has named CH2M's former human rights lead as Jacobs' Director of Social Impact, responsible for overseeing strategy and implementation of Jacobs' worker welfare program globally. This position reports into our Vice President for Ethics & Compliance, and our Chief Administrative Officer serves as Executive Sponsor.

We are currently in the process of updating Jacobs' [Code of Conduct](#) and [Supplier Code of Conduct](#) to provide an integrated policy framework for our combined company and reflect international best practices. Additionally, we will be introducing a new human rights policy for Jacobs based upon CH2M's industry-leading [Worker Welfare Policy](#). These materials will underpin a robust human rights program that incorporates risk-based supplier prequalification, monitoring, assessment, auditing, reporting, intervention, and continuous improvement, along with innovations in training, outreach, and technology to enhance worker welfare.

Externally, Jacobs will continue to play a leadership role in the [Building Responsibly](#) business coalition, with our Director of Social impact currently serving as Chair of the Steering Committee. While there is much we can accomplish internally, we know that no single company can address these complex challenges alone, and thus believe that it is essential to collaborate with peer companies to establish and disseminate common standards, practices, and tools across the industry.

We also understand the importance of considering a diversity of perspectives, and thus will continue to operate with a commitment to multi-stakeholder engagement across the business, government, civil society, and academic sectors.

Again, we appreciate your outreach and look forward to ongoing collaboration as we move forward in our common journey to promote the ethical treatment of workers.

Best regards,



Steven J. Demetriou