Modern Slavery Act Statement

This statement is made on behalf of Bechtel Limited and Bechtel Management Company Limited (collectively referred to as “Betchel”) pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) and constitutes Bechtel’s slavery and human trafficking statement for the financial year ending 31st December 2016.

Betchel is committed to respecting human rights everywhere we operate, consistent with Betchel’s Vision, Values & Covenants. Within Betchel and throughout our supply chain, we are committed to treating people with dignity and respect. We expect our business partners, contractors and suppliers to adhere to ethical business conduct consistent with our own.

ORGANISATION’S STRUCTURE
Betchel is engaged in engineering, construction, and project management services. We work within a diverse value chain of business partners and suppliers and recognize that each entity in this supply chain has a duty to respect human rights. As customers, we take an active role in communicating our expectations to suppliers.

OUR POLICIES
We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our Policy Against Human Trafficking and Slavery reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Consistent with the principles set forth in our Betchel Code of Conduct, Betchel does not tolerate the use of slavery, servitude, forced or compulsory labor or human trafficking in the performance of Betchel contracts by our employees, our contractors, business partners or suppliers.

Betchel has resources available to facilitate reporting and protect workers who lodge complaints or report violations. We have an Ethics HelpLine available as a confidential resource at ethics@bechtel.com or by phone at 1-800-BECHTEL (1-800-232-4835) from the USA and 0800-206-1009 from the UK. Where allowed by law, the Ethics HelpLine allows anonymity. Betchel does not tolerate threats or acts of retaliation against anyone for raising legitimate concerns. The company is committed to investigating and responding to such concerns in a prompt and responsible manner.

DUE DILIGENCE PROCESS
Betchel has taken several steps to identify, assess, and mitigate the risk of slavery and human trafficking in our supply chain, including the following:

1) We set clear expectations for our suppliers that Betchel does not tolerate the use of slavery, servitude, forced or compulsory labor or human trafficking, as set forth in Betchel’s Code of Conduct. We expect our suppliers to meet these expectations. Betchel’s supplier portal (supplier.bechtel.com) clearly communicates Betchel’s expectations.
2) Bechtel’s standard terms and conditions with suppliers establish our expectations that no slavery is used anywhere in the supplier’s business or by any of the suppliers in its own supply chain. Our suppliers agree to comply with all applicable local and national laws and regulations. We have the right to terminate a contract with a supplier for a breach of our terms and conditions.

3) Bechtel has resources available to facilitate reporting and protect workers who lodge complaints or report violations.

4) Our procurement process includes vetting new suppliers and carrying out a risk analysis based on the nature and value of the product or service.

5) We engage with external stakeholders to inform our risk management, as well as share good practices:
   a) Founding Member and Steering Committee Member of the Building Responsibly Initiative
   b) Observer to the International Code of Conduct Association for Private Security Providers on Human Rights
   c) Vice Chair of the Human Rights Task Force of IPIECA (global oil and gas association)
   d) Vice chair of the U.S. Council for International Business Corporate Responsibility Committee on Human Rights

TRAINING
Bechtel employees complete an annual ethics awareness workshop. To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we are developing additional training to provide to relevant members of staff. We plan to continue expanding on our training with content specific to recognizing possible signs of slavery and human trafficking and mitigating risks within the supply chain.

Steven Kay
For and on behalf of Bechtel Limited
June 22, 2017

Richard Freer
For and on behalf of Bechtel Management Company Limited
June 22, 2017