Modern Slavery Act Statement

This statement is made on behalf of Bechtel Limited and Bechtel Management Company Limited (collectively referred to as “Bechtel”) 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 2017.

Bechtel is committed to respecting human rights everywhere we operate, consistent with Bechtel’s Vision, Values & Covenants. Within Bechtel 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

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

Our global supply chain program supports Bechtel’s goal of ensuring that our suppliers are also committed to acting ethically and ensuring modern slavery and human trafficking is not taking place anywhere in their supply chain or business, including in the recruitment of workers to Bechtel projects.

Our policies seek to prevent modern slavery and human trafficking and our employees are responsible for
complying with these policies. Bechtel employees found to be in violation are subject to discipline, up to and including termination.

Reportin Violations
Bechtel 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. Bechtel 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
Bechtel 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 Bechtel does not tolerate the use of slavery, servitude, forced or compulsory labor or human trafficking, as set forth in Bechtel’s Code of Conduct. We expect our suppliers to meet these expectations. Bechtel’s supplier portal (supplier.bechtel.com) clearly communicates Bechtel’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. Workplace conditions audits will be implemented in 2018 at select sites.

Verification of Supply Chain
Our procurement process includes vetting new suppliers and carrying out a risk analysis based on the nature and value of the product or service. Our vetting process includes collecting information from the suppliers, reviewing the supplier’s information and background data and performing a risk-based analysis considering the supplier’s location and scope of work.

External Engagement
We engage with external stakeholders to inform our risk management, as well as share good practices:

a. Founding member of the Building Responsibly Initiative (the first engineering and construction industry coalition dedicated to promoting worker welfare)

b. Vice-chair of the Human Rights Task Force of IPIECA (global oil and gas association)

c. Vice-chair of the U.S. Council for International Business Corporate Responsibility Committee on Business and Human Rights

Training
Bechtel employees complete an annual ethics awareness workshop. Additionally, Bechtel has developed an online training module focusing on the prevention of modern slavery and human trafficking in our supply chains and business. This targeted training has been delivered to relevant Bechtel personnel including Human Resources employees and those who may have a greater exposure to these areas of risk in their work.