

# Modern Slavery Act Statement 2018

## Our Business and Supply Chain

Fluor is one of the world's largest engineering, procurement, fabrication, construction, maintenance, and project management companies. With headquarters in Irving, Texas, Fluor has more than 53,000 employees worldwide and operates in more than 60 countries. Fluor works with governments and clients in diverse industries around the world to design, construct, and maintain complex and challenging capital projects. Fluor's supply chain includes thousands of suppliers from more than 60 countries, delivering materials, equipment, and services to projects worldwide. This statement reflects the steps Fluor<sup>1</sup> took in 2018 to prevent modern slavery in its business and supply chain.

## Our Commitment

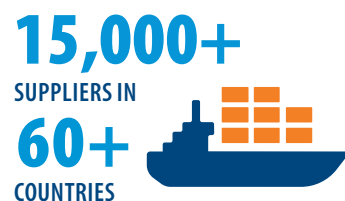
For more than 100 years, Fluor has had an absolute determination to do the right thing. In all of our dealings, Fluor is committed to unyielding integrity and the highest standard of business conduct. This commitment is integral to Fluor's continued success, and we believe it positively impacts our diverse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

communities where we do business. To learn more about Fluor's commitment to sustainable business practices, see our annual Sustainability Reports at [www.fluor.com/sustainability](http://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 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, employment, and fair employment practices. Further, the dignity of workers is protected and preserved; 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; charging recruitment fees to the employee is prohibited.

<sup>1</sup> This statement includes steps taken by Fluor subsidiaries, including Fluor Limited and Fluor International Limited, whose boards approved this statement on February 13, 2019.



- ▶ A clean, secure, safe, and healthy working environment is provided.
- ▶ 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, is 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 its expectations in our Code of Business Conduct and Ethics (Code) to which all employees are required to adhere. Additionally, Fluor's suppliers and contractors are required 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](http://www.fluor.com/sustainability/ethics-compliance).

Fluor's Code and Supplier Expectations also 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 and 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 its operations and procurement activities to instill confidence that modern slavery does not exist in our supply chain. Because at any one time Fluor has, an average of, 1,000 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 and Supplier Expectations. We also expect that our suppliers and contractors hold their own suppliers to these same high standards.

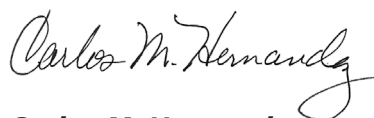
In the Human Rights and Employment Practices section of our Supplier Expectations, we clearly set forth our expectation that our suppliers and contractors perform work without the use of forced, compulsory, bonded, or indentured labor and that they never use misleading or fraudulent practices during 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 2018, we launched a required Human Trafficking and Modern Slavery training and certification program for our Supply Chain personnel globally. 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 2019, we will extend that training to other functions within Fluor. We will also continue our employee awareness campaign on modern

slavery, begun in 2017, which includes an educational course developed by TRACE and recommended to all employees on the Fluor University® online learning platform.

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 2018, we continued our leadership in Building Responsibly, a collaborative effort with five other engineering and construction companies that addresses worker welfare issues. Fluor co-led the effort to draft the Building Responsibly Worker Welfare Principles. These principles, released in June 2018, will serve as a global standard for worker welfare and are the foundation on which Building Responsibly will base its work. Fluor's commitment to worker welfare contained in this document is based on those principles, which 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>.

In 2019, Fluor will continue to review its 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

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