

**Business Conduct and  
Ethics Expectations  
for Suppliers  
and Contractors**

# Getting things right.



Fluor has always had an absolute determination to do the right thing. Fluor is committed to unyielding integrity and the highest standards of business conduct throughout the corporation. This top-down commitment has positive impacts on our global supply chain, clients, employees and the communities where we work. It has proven integral to Fluor's continued success.

Fluor is one of over 20,000 signatories to the [United Nations Global Compact](#), which is a call to align strategies and operations with universal principles on human rights, labor, environment and anti-corruption, and take actions that advance societal goals. Fluor will only do business with others who share our values of safety, integrity, teamwork, excellence and the values expressed within the Global Compact. Fluor's suppliers and contractors are expected to do what is necessary to understand and comply with these expectations and, in turn, require their suppliers and subcontractors to conform as well. Suppliers and contractors must never act, or fail to act, in a way that could cause Fluor to be in breach of applicable laws or regulations. Our mutual success and continuing business relationships depend on it. Fluor reserves the right to verify that a supplier or contractor's business operations meet these expectations. **Failure to act in a manner consistent with these expectations may impede your business relationship with Fluor.**



**Fluor requires our suppliers and contractors to maintain and enforce policies and adhere to lawful business practices that are encompassed by our expectations.** These expectations may be amended periodically. The most current version is available at <https://www.fluor.com/about-fluor/approach/compliance-and-ethics>. Fluor expects its suppliers and contractors to provide their employees with enough information and training to make sure that they understand and comply with these expectations. For questions, comments or training support about our expectations, please contact your Fluor representative or Fluor's Chief Procurement Officer at [procurement@fluor.com](mailto:procurement@fluor.com).

## Health, Safety & Environmental

The health and safety of all personnel associated with our work is our highest priority. Fluor's suppliers and contractors are expected to:

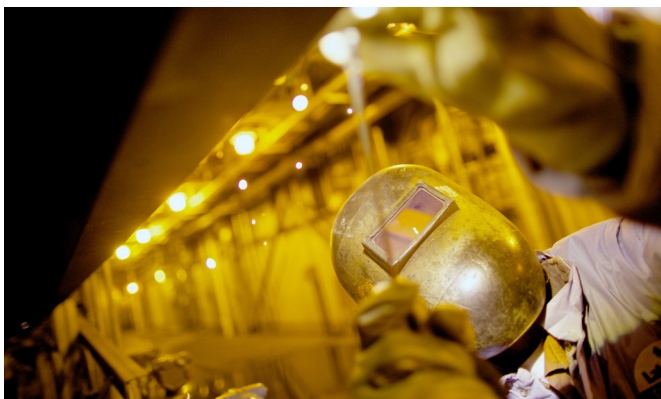
- ▶ Provide a safe and healthy work environment that supports accident prevention, minimizes exposure to risks, is in compliance with applicable workers' health and safety laws and reduces harmful impacts to the surrounding community.
- ▶ Apply safe work practices (including regulatory and contract-specific requirements) to all their activities and instill safety in every aspect of their work, attitude and behavior of all the workers.
- ▶ Conduct their operations in an environmentally responsible manner and in accordance with applicable environmental laws.

## Human Rights and Employment Practices

The welfare of our workers and the workers of our suppliers and contractors is critical to Fluor successfully performing work. We are a member of [Building Responsibly](#) whose purpose is to serve as the global standard on worker welfare for the engineering and construction industry and have agreed to abide by the Building Responsibly principles. Our suppliers and contractors are expected to comply with these principles and to do the following:

- ▶ Pay employees a living wage and require the same from their suppliers and contractors.
- ▶ Support and respect human rights and avoid complicity in human rights abuses, including through avoiding the use of conflict minerals.
- ▶ Perform work without the use of forced, debt-bonded, indentured, trafficked or child labor.
- ▶ Never use force, fraud, coercion or misleading practices during the recruitment of employees or offering of employment.
- ▶ Treat all their workers with dignity, respect and fairness.
- ▶ Conduct all their operations in a socially responsible, nondiscriminatory manner in the spirit of the [ILO Declaration on Fundamental Principles and Rights at Work](#) and in accordance with applicable laws, including those associated with working hours, wages and benefits, equal opportunity, harassment-free work environment, freedom of association and data privacy.

For more information on Fluor's commitment to Human Rights, refer to [Fluor's Modern Slavery Statement](#) available on [www.fluor.com](http://www.fluor.com).



## Sustainability

Fluor's sustainability mission envisions meeting the needs of Fluor's clients while conducting business in a socially, economically, and environmentally responsible manner to the benefit of current and future generations, thereby creating value for all stakeholders. Every day, Fluor helps our clients safeguard the environment, conserve energy, protect lives and strengthen the economies and social structures of communities in which Fluor employees work and live. At Fluor, leadership in sustainability is more than just a responsibility; it is a privilege.

Our suppliers and contractors are expected to do the following:

- ▶ Treat qualified suppliers and contractors without bias and discrimination.
- ▶ Maintain compliance and minimize any negative impact to biodiversity and ecosystems.
- ▶ Select and utilize suppliers and subcontractors who conduct their business in a socially, economically and environmentally responsible manner.
- ▶ Partner with Fluor to collaborate on sustainability improvements that benefit our clients, our company and the communities in which we work and share the knowledge gained with their supply base so that they can benefit from sustainability best practices and implement them.



## Conflict Minerals

Fluor is committed to offering products that do not contain conflict minerals (including tin, tantalum, tungsten and gold). Conflict minerals are those that support or fund conflict within the Democratic Republic of Congo or adjoining countries. In that regard, we expect our suppliers to:

- ▶ Exercise due diligence by investigating the source of any conflict minerals.
- ▶ Respond in a timely manner to requests for information regarding their source for the minerals.
- ▶ Only supply Fluor with products and materials that originate from conflict-free sources.

## Financial and Operation Controls

Our suppliers and contractors are expected to:

- ▶ Keep accurate, complete, fair, timely, transparent and understandable financial and operational books, records, and accounts, and a system of effective internal controls in accordance with Generally Accepted Accounting Principles.
- ▶ Create, retain and dispose of business records in accordance with applicable legal and contractual requirements.
- ▶ Keep accurate and complete records prepared for Fluor, including records of work time and expenses, and allow access in accordance with the contractual audit requirements.
- ▶ Protect nonpublic information relating to Fluor.
- ▶ Comply with insider trading laws, including the prohibition against buying or selling securities or advising (e.g., tipping) others to buy or sell securities while aware of or in possession of any material, nonpublic information including that of Fluor or our clients and partners.

## Trade Controls

Our suppliers and contractors are expected to:

- ▶ Know and comply with the export controls, economic sanctions, import regulations, and anti-boycott laws applicable to their work with and for Fluor.
- ▶ Never participate in boycotts or other restrictive trade practices contrary to United States or applicable local laws.
- ▶ Be familiar and compliant with export controls and understand any possible risk and noncompliance scenarios as they relate to the company's products, technology, destination and activities.
- ▶ Provide accurate commodity jurisdiction and export control classification information, including all applicable material test reports, supplier-provided materials, equipment, technology and technical data.
- ▶ Be familiar and compliant with import controls and customs regulations and provide accurate tariff classification information, including applicable material test reports (as required), for supplier- and contractor-provided materials and equipment.
- ▶ Provide proper country of origin information for all supplier-provided materials and equipment.
- ▶ Maintain appropriate customs and trade-related processes and procedures to adhere with all applicable customs laws and regulations.
- ▶ Disclose to your Fluor Supply Chain representative any apparent conflict between U.S. and applicable local law requirements, such as the laws blocking certain U.S. restrictions adopted by Canada, Mexico, and the members of the European Union.

## Anti-Bribery and Corruption

Fluor maintains zero tolerance for bribery and expects our suppliers and contractors to do the same. Bribery is directly or indirectly giving or promising to give anything of value to improperly influence actions of a third party. Bribes may include money, gifts, travel or other expenses, hospitality, below-market loans, discounts, favors, business opportunities, political or charitable contributions or any direct or indirect benefit or consideration. We expect suppliers and contractors to remain in compliance with all relevant anti-corruption laws in addition to Fluor's contract terms and conditions related to anti-bribery and corruption.



## Conflicts of Interest, Gifts, Entertainment and Business Courtesies

Our suppliers and contractors, their employees and their family members must not receive improper benefits through their relationship with Fluor or allow other activities to conflict with acting in the best interests of Fluor. Our suppliers and contractors are expected to:

- ▶ Limit promotional items and entertainment involving our employees to reasonable business courtesies, within accepted business practices and never with the intent to improperly influence a business decision or create a potential conflict of interest or the appearance of impropriety.
- ▶ Disclose any potential conflict of interest or contractual business relationship with Fluor employees, family members and other close personal relationships to your Fluor Supply Chain representative for review prior to entering into any business transaction.

## Competing Fairly

Fluor believes in the free-market system where merit, quality, price and other objective factors determine who succeeds and who fails. Our suppliers and contractors are expected to:

- ▶ Compete honestly and fairly.
- ▶ Comply with applicable antitrust and competition laws.
- ▶ Never participate in anti-competitive practices such as price fixing or bid rigging.

## Money Laundering Prevention

Our suppliers and contractors are expected to follow applicable laws that prohibit money laundering and require the reporting of cash and other suspicious transactions related to Fluor contracts to their Fluor Supply Chain representative.

## Lobbying

In many countries, strict rules govern lobbying activities. Lobbying requires disclosure to the government and covers many kinds of activities, including but not limited to:

- ▶ Contact with legislators, regulators, executive branch officials or their staff.
- ▶ Making or negotiating sales for government contracts.
- ▶ Efforts to influence legislative or administrative action.

In certain countries, lobbyists must be registered. We expect our suppliers and subcontractors to comply with applicable lobbying laws and regulations.



## Company Resources

Fluor “resources” include property, assets, intellectual property and confidential and/or private information. Our suppliers and contractors are expected to:

- ▶ Safeguard Fluor resources utilized in the course of performing work by using such resources solely for legitimate business purposes to advance the interest of Fluor and for no other purpose.
- ▶ Honor the intellectual property rights of Fluor, our clients and partners at all times.
- ▶ Maintain, handle and process any confidential information on a need-to-know basis, with appropriate technical and organizational controls and in accordance with applicable law.
- ▶ Not download software onto Fluor assets, nor utilize tools that connect to the Fluor network or process Fluor information (including for example any Artificial Intelligence tools), without Fluor prior approval.
- ▶ Vigilantly oversee every effort to ensure that any possible phishing, hacking, malware attack or other cyber-security threat identified during the course of business with Fluor is addressed and rectified in a timely manner and, where a data incident or breach has occurred, immediately notify Fluor.
- ▶ Protect the privacy of Fluor employees’ personal data by strictly complying with governing legal requirements regarding the collection, storage, processing and use of such data in relation to the services provided to Fluor.
- ▶ Comply with all commercial instructions found in purchase orders and contracts, which are designed to minimize the risks and occurrences of fraud (e.g., bank payment instruction changes, company name changes, payment terms changes, etc.).

Additionally Fluor’s Third-Party Privacy Notice is available at [www.fluor.com](http://www.fluor.com) and describes how Fluor collects, uses and discloses personal information about you, as a contracting partner, supplier or other similar third party in the course of our business dealings with you or in the general course of our business.



## Government Work

Our suppliers and contractors who work on projects where government entities or agencies are involved are expected to understand and follow government contracting rules, regulations and procedures.

## Reporting Concerns

Our suppliers, contractors and their employees should promptly report any business conduct and ethics concern involving or affecting Fluor, whether or not the concern involves the supplier or contractor, by contacting one of the following:

1. Their Fluor Supply Chain representative
2. Fluor’s Chief Procurement Officer at [procurement@fluor.com](mailto:procurement@fluor.com)
3. The Fluor Compliance and Ethics Integrity Portal and Hotline at [www.fluorintegrity.com](http://www.fluorintegrity.com).

The Fluor Compliance and Ethics Integrity Portal and Hotline is a way for Fluor suppliers, contractors and others to report activities that may involve illegal or unethical conduct or violations of these expectations or Fluor’s Code of Business Conduct and Ethics. Reports may be made anonymously where allowed by local law. A supplier or contractor may also be requested to take such steps as Fluor may reasonably request to assist Fluor with investigating any ethics concern involving Fluor and the supplier or contractor. Fluor prohibits Fluor personnel from retaliating against any person reporting an ethics concern. Fluor expects suppliers to similarly protect their own employees from retaliation by others in their own organization. Contact the Fluor Compliance and Integrity Portal and Hotline if retaliation is suspected.

**Speak up and make misconduct disappear.**

**unethical  
unethical  
unethical  
unethical  
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ethical**

**Report unethical activity. It's the right thing to do.**

**FLUOR**<sup>®</sup>