



Modern Slavery Act Statement

Financial Year 1 January 2024 – 31 December 2024

1. The Reporting Companies

This Statement is made in accordance with the United Kingdom's Modern Slavery Act 2015, Australia's Modern Slavery Act 2018, and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023. It covers the reporting period January 1, 2024 to December 31, 2024.

United Kingdom Modern Slavery Act 2015

The reporting "Commercial Organisations"¹ for this Statement under the United Kingdom Modern Slavery Act 2015 are:

- Bechtel Limited ("BLTD"), a private company limited by shares, registered in England & Wales (company number 506133) with its registered office at 6th Floor, Building 6, Chiswick Park, 566 Chiswick High Road, London W4 5HR, England. BLTD's board of directors approved this statement on May 27, 2025.
- Bechtel Management Company Limited ("BMCL"), a private company limited by shares, registered in England & Wales (company number 04252526) with its registered office at 6th Floor, Building 6, Chiswick Park, 566 Chiswick High Road, London W4 5HR England. BMCL's board of directors approved this statement on May 27, 2025.

Australian Modern Slavery Act 2018

The "Reporting Entities"² for this Statement under the Australian Modern Slavery Act 2018 are:

- Bechtel Australia Proprietary Limited ("BAPL"), a proprietary company registered in Australia (company number ACN 006 334 505) with its registered office at Level 3, 540 Wickham Street, Brisbane, QLD, 4006, Australia. BAPL's board of directors approved this Statement on May 24, 2025.
- (Australia) Pty Ltd ("BCAPL"), a proprietary company registered in Australia (company number ACN 137 316 539) with its registered office at Level 3, 540 Wickham Street, Brisbane, QLD, 4006, Australia. BCAPL's board of directors approved this Statement on May 24, 2025.
- Bechtel (Western Australia) Pty Ltd ("BWAPL"), a proprietary company registered in Australia (company number ACN 147 531 226) with its registered office at Level 12, 140 St. Georges Terrace, Perth, WA 6000, Australia. BWAPL's board of directors approved this Statement on May 24, 2025.

Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023

The "Entities"³ with a Reporting Obligation under Canada's Fighting Against Forced Labour in Supply Chains Act 2023 for this Statement are:

- Bechtel Canada Co. ("BCANDCO"), a proprietary company registered in Nova Scotia, Canada (company number 3053855), with its registered office at 600-1741 Lower Water Street, Halifax, NS, B3J 0J2, Canada. BCANDCO's board of directors approved this statement on May 22, 2025.
- Northbech Co. ("NOBC"), a non-operating holding company that owns 100% of the issued and outstanding stock of BCANDCO.⁴ NOBC is a proprietary company registered in Nova Scotia, Canada (company number 3056281) with its registered office at Queen's Marque, 600-1741 Lower State Street, P.O. Box 997, Halifax, NS, B3J 2X2, Canada. NOBC's board of directors approved this statement on May 22, 2025.

¹Clause 54(1)-(3), Part 6 of the United Kingdom's Modern Slavery Act 2015 defines a "commercial organisation" required to prepare a Modern Slavery Act statement.

²Section 5, Part 1 of the Australian Modern Slavery Act 2018 defines a "reporting entity" required to prepare a Modern Slavery Act statement.

³Sections 2 and 9 of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 sets out the "Entities" required to prepare a modern slavery-related annual report.

⁴NOBC is also a shareholder of Bantrel Co., which will file a separate annual report under Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023.

This is a joint Statement made on behalf of BLTD, BMCL, BAPL, BCAPL, BWAPL, BCANDCO and NOBC (collectively referred to herein as the “Reporting Companies”) reporting on the risk of modern slavery and human trafficking in their operations and supply chains and the actions taken to address and mitigate those risks.

A table setting out how this Statement addresses the United Kingdom, Australian and Canadian legislation reporting criteria for each of the Reporting Companies, as applicable, is set forth in Appendix I.

The Reporting Companies are part of the Bechtel group of companies. Unless expressly stated otherwise herein, references to the ‘Bechtel group of companies,’ ‘Bechtel,’ ‘we,’ ‘us’ and ‘our’ refer to refers to Bechtel Group, Inc. and its direct and indirect wholly owned subsidiaries.

2. Our Business

Bechtel is a leading global engineering, procurement, construction, and project management company. Differentiated by the quality of our people and our relentless drive to deliver the most successful outcomes, we align our capabilities to our customers’ objectives to create a lasting positive impact.

We operate through five global business units (GBUs):

- **Infrastructure**, headquartered in London, with offices in Riyadh, KSA, and projects across the globe.
- **Nuclear, Security, & Environmental**, headquartered in Reston, Virginia, with offices in Knoxville and Oak Ridge, Tennessee, and projects in the United States and allied nations.
- **Energy**, headquartered in Houston, Texas, with projects across the globe.
- **Mining & Metals**, with offices in Brisbane and Perth, Australia; Santiago, Chile; and Lima, Perú; with projects across the globe.
- **Manufacturing & Technology**, headquartered in Reston, Virginia, with an office in Chandler, Arizona, and projects in the United States and Europe.

BLTD and BMCL operated across the Energy, Mining & Metals, and Infrastructure GBUs during 2024, primarily in the United Kingdom, Albania, Serbia and Taiwan.

BAPL, BCAPL and BWAPL operated across the Energy and Mining & Metals GBUs during 2024.

BCANDCO operated across the Energy, Mining & Metals, and Infrastructure GBUs during 2024 predominantly in Alberta, Ontario, and Manitoba, and its activities included Engineering, Procurement, Construction and Project Management and professional services. NOBC is a holding company with no operations.

Core to Bechtel is our [Vision, Values & Commitments](#) (VV&Cs). They are what we believe in, what our customers expect, and how we deliver. Consistent with our VV&Cs, we are dedicated to upholding and respecting human rights everywhere we operate and treating people with the utmost respect. We expect our business partners, contractors, and suppliers to do the same.



3. Risk Assessment

a. Modern Slavery and Human Trafficking Risks Within Our Operations

The risk of modern slavery and human trafficking within our operations is influenced by and interdependent on several factors, including, most significantly, the geographical locations where we operate, the scope of services we provide, how we engage our workforce, and whether we perform individually or through a partnership/joint venture/consortium with a third-party(ies).

Geography. Our projects and related offices/sites that provide the on-the-ground day-to-day work needed to manage, design, and build our customers' complex projects are geographically dispersed, and in some cases, remote. Although a risk of modern slavery and human trafficking exists in every country, we consider projects located in countries with a higher prevalence of, or vulnerability to, modern slavery and human trafficking to have a higher risk than projects located in countries with a lower risk of modern slavery and human trafficking. As part of our analysis to understand our highest risk locations, we utilize the World Justice Project Rule of Law Index (the "WJP Rule of Law Index") available at WorldJusticeProject.org, which measures human rights, access to justice and authoritarianism in 140 countries. We consider, for example, projects undertaken by Bechtel in Canada to have a low risk of modern slavery and human trafficking. In addition to Canada having a lower risk according to the WJP Rule of Law Index, Bechtel projects in Canada involve primarily highly skilled or office-based workers, as well as workers who are primarily permanent residents of Canada.

In addition to project offices, Bechtel operates at permanent offices that support core business functions and provide centralized support to our projects. We believe the overall risk of modern slavery and human trafficking at Bechtel's permanent offices is low as they are located primarily in countries with strong worker welfare and employment laws and where modern slavery risk and human trafficking is relatively low according to the WJP Rule of Law Index— e.g., Australia, the United Kingdom, Canada, and the United States. Even where a permanent office is located in a country with a higher risk of modern slavery and human trafficking according to the WJP Rule of Law Index — e.g., India — we believe the risk is still low as Bechtel follows a robust set of corporate and human resources policies and processes at such locations.

Scope of Services. We are involved at various stages of and contract for various scopes in connection with our customers' projects, from feasibility studies and front-end engineering and design to project management consulting and full engineering, procurement, and construction services. The risk of modern slavery and human trafficking varies based on the type of services provided.

Study/FEED/Engineering Scopes: We believe that study, front-end engineering and design, and engineering scopes have a low risk of modern slavery and human trafficking. This is because such scopes generally involve highly skilled personnel working from Bechtel permanent offices.

Construction Scopes: Construction scopes generally present a higher risk of modern slavery and human trafficking particularly for large projects in less developed countries. Given the demand for and limited availability of sufficient craft labor in many countries, foreign migrant labor is often utilized. Foreign migrant laborers are particularly vulnerable to modern slavery risks due to such factors as language barriers and potential exploitation by recruitment agencies (see "Workforce Engagement," below).

Procurement Scopes: Projects with procurement scopes involving purchasing materials and services required to construct large projects present a higher risk of modern slavery and human trafficking because of the complexity and scale of our global supply chains (see "Modern Slavery Risks Within Our Supply Chain," below). These risks are higher when purchasing goods and services that have a higher risk of modern slavery and human trafficking and/or when procuring from countries with a higher risk of modern slavery and human trafficking.

Partnering. Projects where we partner with third parties to perform may present a heightened risk of modern slavery and human trafficking, as we may not have the same level of authority, control, and influence as we do when self-performing.

Workforce Engagement. The use of contingent or temporary workers carries a high risk of modern slavery and human trafficking, as these can include potentially vulnerable groups such as migrant workers. This risk is heightened when using third-party recruitment agencies, given the potential for deceptive recruitment practices such as charging workers fees that can result in debt bondage.

b. Modern Slavery Risks Within Our Supply Chain

Bechtel primarily purchases capital goods and/or equipment and services for construction projects. Across all of Bechtel's business lines and in all countries in which Bechtel does business, Bechtel's procurement and contracts group worked directly with approximately 7,000 suppliers of goods, equipment and services from 47 countries and issued 56,870 orders with approximately USD\$12.2 billion total commitments during the 2024 financial year.⁵

Given the complexity and reach of Bechtel's supply chain, we apply a risk-based approach to assess modern slavery and human trafficking risk. Risk is considered higher when purchasing goods, equipment and/or services that have a higher risk of modern slavery and human trafficking, as identified by US Department of Labor and Responsible Sourcing Tool, and/or when procuring goods, equipment, and/or services from countries with a higher risk of modern slavery and human trafficking, as identified by the WJP Project Rule of Law Index. We maintain a dashboard which ranks current first-tier suppliers as having a high or low risk of modern slavery and human trafficking based on their countries of direct operations and the risk of the goods, equipment or services they provide.

In 2024, Bechtel did not purchase any goods, equipment or services from any first-tier suppliers in the 18 countries identified by the WJP Project Rule of Law Index as having the highest risk with respect to modern slavery and human trafficking. In addition, in 2024, less than 1.5% of Bechtel's commitments were for high-risk commodities identified by the US Department of Labor and Responsible Sourcing, including electronics and electronic components, solar panels, steel products and galvanized products.

4. Due Diligence and Management

a. Policies Against Human Trafficking and Slavery

Bechtel maintains systems and processes to avoid complicity in practices that constitute modern slavery and human trafficking. Bechtel maintains policies on modern slavery and human trafficking that reflect our commitment to maintaining a work environment free from modern slavery and human trafficking. Bechtel's policies generally apply across the Bechtel group of companies and have been adopted by the boards of directors of each of the Reporting Companies. Bechtel respects human rights everywhere and operates in accordance with the spirit and intent of the United Nations Guiding Principles on Business and Human Rights and the International Labour Organization Labour Standards.

b. Ethics and Compliance

Bechtel's [Code of Conduct](#), which is published in seven languages, makes clear that we are committed to ensuring that there is no form of modern slavery (including forced labor or child labor) or human trafficking in our supply chain or in any part of our business, and that Bechtel does not tolerate the use of either in the performance of Bechtel contracts by our employees, suppliers, subcontractors, or business partners. The Code of Conduct instructs employees to immediately report any concerns about any issue or suspicion of modern slavery or human trafficking to their supervisor, the Ethics & Compliance Officer, the Legal Department, or the [Ethics HelpLine](#). Our employees are responsible for complying with our policies and the Code of Conduct, and violation of them is subject to discipline, up to and including termination.

Bechtel encourages employees, suppliers, subcontractors, and other third-party business partners to ask questions about our Code of Conduct and to report any issues, concerns, or suspicions of modern slavery or human trafficking. We have an Ethics HelpLine available as a confidential resource on the internet at HelpLine.Bechtel.com, by email at ethics@bechtel.com, or by phone at 1-800-BECHTEL (1-800-232-4835) from the United States and Canada, 0800-206-

⁵ With respect to Canada specifically, in 2024, BCANDCO and NOBC committed total funds of USD \$27.7 million and with respect to the United Kingdom, BLTD and BMCL committed total funds of USD \$25.9 million in goods and services to suppliers and contractors, of which the vast majority of spend was for construction consumables and construction services.

1009 from the United Kingdom, and 1-800-316-704 from Australia. Where permitted by law, the Ethics HelpLine allows anonymity. We do not tolerate threats or acts of retaliation against anyone for raising legitimate concerns, and we are committed to addressing each concern in a prompt and responsible manner. Our Ethics & Compliance Officer has responsibility for assessing and responding to any issues, including any related to Modern Slavery and Human Trafficking, reported to Ethics & Compliance through the Ethics Helpline or otherwise.

c. Training and Awareness

Our online and instructor-led course entitled “Modern Slavery Awareness” is available to all Bechtel employees in English and Spanish. It focuses on how to identify the warning signs of modern slavery and human trafficking and how to manage it, and it incorporates assessments requiring the application of training knowledge to potential real-world scenarios. The course is mandatory for employees who, due to the nature of their work, function, or location, may be more likely to encounter signs of modern slavery or human trafficking. A workshop format, designed with the flexibility to address local issues and risks and share best practices on how to manage them, is also available to project management teams on sites where modern slavery and human trafficking may be higher risk. In 2024, across Bechtel, 6,018 employees completed the course.

All Bechtel employees must participate in annual compliance and ethics training. Participation for employees required to take the Modern Slavery Awareness course and for all employees with respect to the annual compliance and ethics training is monitored and enforced by supervisors and Bechtel management.

d. Upfront Risk Assessment and Mitigation Planning

Bechtel policy requires an upfront risk assessment before a commitment can be made to a customer’s project. This includes identifying sustainability risks, which includes risks to the environment, safety, and well-being of the people and communities who may be affected by our projects, as well as reputational risks arising from association with or performance of services for a customer whose reputation for business practices and ethics does not match our own.

Similarly, Bechtel policy requires due diligence and corporate approval before entering into project-specific or multi-project joint associations to ensure that the proposed third-party associate has ethical standards and modern slavery and human trafficking policies and procedures that are compatible with our own. Approval requests to enter into joint associations must address any character, reputation, ethics or compliance issues and the proposed associate’s commitment to Bechtel’s standards regarding ethics, legal compliance, health, safety, the environment, and sustainable development. This upfront risk assessment encourages early and proactive risk mitigation planning and actions, including modern slavery and human trafficking policies and procedures.

e. Foreign Migrant Workers

The technical challenges of large engineering and construction projects combined with the lack of sufficiently skilled craft professionals in many countries means that some of our customers’ projects require the recruitment of foreign migrant workers. The recruitment and employment process for craft professionals varies from project to project. Bechtel, a joint venture partner, or subcontractors may have varying levels of responsibility or shared responsibility over the process. However, regardless of who has the responsibility, Bechtel seeks customers, partners, and subcontractors who share our values and promote global standards of ethical business conduct through these relationships. Bechtel’s Guiding Principles on the Recruitment and Employment of Foreign Migrant Workers (the “Guiding Principles”) provide a consistent approach to ethically recruiting and managing foreign migrant workers, engaging our joint venture partners who may be responsible for recruiting and managing migrant workers, and communicating our standards to customers and other external stakeholders. The Guiding Principles provide that:

- Relevant policies and procedures should treat migrant workers fairly and without any form of discrimination.
- Contract terms and conditions should be written and communicated in a manner that is understood by migrant workers, and employment should be with a recognized and authorized employer in the country of work.
- No recruitment or placement fees should be collected.
- National passports, identity, and residency documents should be freely accessible by migrant workers.
- Wages should be paid regularly and directly to migrant workers per contract terms.

- Freedom to join worker associations and bargain collectively should be available to migrant workers.
- Migrant workers should be provided with humane, safe, and secure working conditions, accommodation, and transportation between the work site and living quarters.
- Migrant workers should not be subjected to any form of intimidation or inhumane treatment, including in disciplinary matters.
- Access to legitimate grievance mechanisms and resolution processes should be provided to migrant workers without fear of retaliation or dismissal.
- Upon completion of work, or under special circumstances, as per contract terms, migrant workers should be able to return to their home country or seek other employment in the country of work, without restrictions.

On projects in which Bechtel controls the recruitment and employment process, our contracts for recruitment services state that Bechtel does not tolerate activities that support modern slavery or human trafficking and requires the contractor to represent that it will adhere to these standards.

For recruitment services of craft professionals in India and the Philippines, Bechtel primarily works with two agencies with which there is an established long-term relationship. These organisations have demonstrated their alignment with Bechtel on standards with regard to ethical recruitment practices.

Bechtel recruitment teams work closely with these organisations in the region and oversee their practices to ensure continued alignment. Regarding a worker's employment contract, recruitment services contractors are required to provide the worker documentation in their native language and provide the worker with sufficient time and opportunity to read the entire agreement. When needed, the recruiter is also required to read the agreement to the worker in the worker's language and answer all the worker's questions relating to the agreement in the worker's language to ensure a full understanding before signing.

In addition, Bechtel's contracts specifically prohibit recruitment services contractors from accepting or requesting any payment of any kind from any potential worker. To assess the effectiveness of such prohibition, in Bechtel recruitment offices in India and the Philippines, candidates are asked by the Bechtel recruitment representatives about whether the candidate worker has paid any such fees to any agencies during the screening process. After the conclusion of the Trade Test and Medical processes, Bechtel representatives ask candidates this question again in their induction prior to travel to the designated projects. An internal investigations team is charged with investigating any potential breaches of the requirements set forth in this paragraph and responding to any breaches.

On projects in which Bechtel does not control the recruitment and employment process, Bechtel uses its influence and available leverage to steer the controlling party toward the best practices reflected in the Guiding Principles. This is through both contractual commitments and ongoing auditing and compliance work throughout the project execution.

In 2024, none of the Reporting Companies engaged foreign migrant workers.

f. Supply Chain

Bechtel manages modern slavery and human trafficking risks in our supply chain by establishing clear expectations with our supply chain partners, conducting due diligence reviews of suppliers, obtaining their commitment to Bechtel's Code of Conduct, incorporating terms and conditions relating to modern slavery and human trafficking in awarded contracts, and conducting in-shop and/or third-party monitoring of suppliers during performance to identify potential issues.

Setting Clear Expectations

As part of the qualification and proposal and prior to award, we require suppliers and subcontractors to commit to [Bechtel's Supplier & Subcontractor Expectations](#), which in addition to stating that Bechtel does not tolerate the use of slavery, servitude, forced or compulsory labor, or human trafficking, require suppliers and subcontractors to:

- Employ workers above the applicable minimum age requirement.
- Maintain a workplace free from threats of violence, physical abuse, or other conduct that fails to respect the safety and dignity of the worker.
- Comply with applicable wage laws and, upon the end of employment, pay return transportation costs for workers recruited from outside the country.

- Not charge workers recruitment fees or utilize firms charging workers such fees and not utilize fraudulent or misleading recruitment practices.
- Not withhold a worker's passport or immigration documents.
- Provide workers with a process for escalating and reporting concerns without retaliation.
- Contractually require their suppliers to conform to the same standards.

In addition, although Bechtel is not a manufacturer and is a privately held company, suppliers must adhere to Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, which aims to prohibit the use of conflict minerals (gold, tungsten, tantalum, and tin) from the Democratic Republic of the Congo or adjoining countries. Suppliers are expected to conduct due diligence to preclude the sales or installation of any materials or equipment that contain conflict minerals.

Identifying, Selecting, and Contracting with Suppliers

Suppliers are generally selected on a project-by-project basis by our Supply Chain function, in collaboration with the project team, making supplier selection and supplier diligence an ongoing dynamic process. Proposed suppliers go through (i) a restricted parties list review that vets the suppliers across 40 different databases, and (ii) a review of our internal warnings and advisories, which identify concerns raised in the performance of prior work with Bechtel.

Depending on various commercial factors, Bechtel may also engage joint venture partners to supply materials and/or services. We maintain, for example, partnership arrangements with two suppliers, Unger Steel FZE, a joint venture that supplies premium steel, and the Çimtaş Group, a joint venture that provides piping supply to Bechtel projects worldwide. These organisations have undergone an enhanced due diligence review and have demonstrated their alignment with Bechtel's VV&Cs.

Once a supplier or subcontractor has been vetted and selected, Bechtel's standard contract terms and conditions require that no modern slavery or human trafficking be used in the supplier's or subcontractor's business or by any of the suppliers or subcontractors in its own supply chain. Bechtel seeks to implement its standard terms and conditions or equivalent terms on modern slavery and human trafficking. Our suppliers and subcontractors agree to comply with all applicable local and national laws and regulations. We have the right to terminate contracts with suppliers and subcontractors that breach our terms and conditions.

Our standard terms and conditions also provide that, at the project site, all suppliers and subcontractors must comply with Bechtel's rigorous safety and health plan. This plan includes Bechtel's core processes for safety and health to ensure that all workers—both Bechtel's and its supply chain's—adhere to our zero-incident values.

Assessing Effectiveness by Managing and Monitoring Supplier Relationships and Performance

In addition to upfront vetting and contract requirements, Bechtel manages and monitors its supplier relationships and supplier performance. Bechtel Supplier Quality & Expediting's (BSQE's) primary function is to communicate with and visit supplier facilities, reinforcing our proactive approach to resolving potential issues, which helps suppliers deliver consistent value in a timely manner. To verify compliance with purchase order requirements and specifications, supplier quality surveillance is performed in accordance with approved quality surveillance plans.

Our quality surveillance checklist and reporting for our suppliers' facilities includes a Sustainability Section requiring the assessor to identify and report any signs of underage workers, involuntary labor, or worker abuse and to identify any indications of worker restrictions that might prevent the reporting of grievances or concerns. If any issue is flagged by the assessor, it goes directly to the project representative and Bechtel management for review and follow-up. All records are kept in our supplier quality database. In consultation with Bechtel management, projects may engage a third-party provider to conduct a workplace conditions assessment or investigate if a positive flag is identified during a Bechtel surveillance assignment.

Along with supplier quality surveillance, we annually identify our key suppliers based on spending and the provision of critical equipment or services, as well as conduct a desktop review of a select group of their policies and approaches to many areas of sustainability, including modern slavery and human trafficking. In 2024, Supply Chain incorporated a

third-party supply chain risk management tool that includes modern slavery and human trafficking among other elements.

Failure of a supplier to cure any identified deficiencies will result in a supplier advisory being issued to Bechtel's Supply Chain personnel, which will remain in place until the deficiencies are rectified. Where we have higher risk suppliers, e.g., in countries without strong labor laws or with identified modern slavery or human trafficking issues, we have a process for engaging a third-party entity to conduct a review of the supplier's facility. When we find corrective actions are needed, we will brief the supplier and conduct a follow-up review of the corrective actions taken.

g. Assessing Effectiveness by Audit and/or Adoption of Compliance Plans

Audit and compliance plans are important tools in ensuring that corporate policies and procedures regarding modern slavery and human trafficking are being implemented and cascaded throughout Bechtel and that contract provisions relating to the same are being complied with.



Corporate Internal Audit

Bechtel's Internal Audit function provides an independent evaluation of internal controls over: (i) compliance with policies and procedures; (ii) the reliability and integrity of information provided to management; and (iii) processes that safeguard Bechtel's assets. With respect to modern slavery and human trafficking, Bechtel's Internal Audit function verifies that modern slavery and human trafficking terms and conditions are incorporated in project pro forma contracts and in sample purchase orders and subcontracts for those projects included in the Internal Audit Annual Audit Plan. In addition, when project payroll is audited, Internal Audit monitors whether hours worked by project personnel are potentially at risk of violating local labor laws. Internal Audit identifies projects for inclusion in its annual audit plan through an assessment of risk attributes of active projects. The risk attributes that overlap with modern slavery and human trafficking risks are the country of execution and the procurement and construction scopes of work. Bechtel entities and projects are audited based on risk; not all are audited annually.

Project Self-Assessments and Audits of Suppliers

In 2024, we continued to deploy a self-assessment tool as part of our implementation of the Building Responsibly Guidance Notes on Worker Welfare. This questionnaire is completed collaboratively via onsite visits with the project teams. It has also been included in the Mental Health Planning toolkit for project managers with the idea that projects effectively implementing the Building Responsibly Guidance Notes on Worker Welfare are less likely to experience mental health and safety issues across the workforce.

Based on our risk assessment of suppliers, we undertake independent audits of certain suppliers that have been identified as potentially higher risk for modern slavery or human trafficking. They are subject to additional monitoring activity, which may include third-party audits.

i. Steps Taken During 2024 To Prevent or Reduce the Risk of Forced Labor and Child Labor

As described more fully in the above sections, the following are some of the steps taken by Bechtel during the 2024 financial year to prevent or reduce the risk of forced labor and child labor:

- Maintained policies, systems, and processes aimed at respecting modern slavery and human trafficking and avoiding complicity in any practice that constitutes modern slavery or human trafficking.
- Required that employees immediately report any concerns about any issue or suspicion of modern slavery or human trafficking.
- Made clear in our policies and contracts that we are committed to ensuring that there is no form of modern slavery (including forced labor or child labor) or human trafficking in our supply chain or in any part of our

business. This includes within the performance of Bechtel contracts by our employees, contractors, business partners, or suppliers.

- Promoted the use of and specified the purpose of the Ethics HelpLine, available in Australia, Canada, and the United Kingdom, by internet, email, and phone.
- Conducted appropriate upfront risk assessments, including identifying sustainability risks, which include risks to the safety and well-being of the people and communities who can be affected by our projects.
- Conducted due diligence before entering into project-specific or multi-project joint associations to ensure that the proposed third-party associate has ethical standards and modern slavery and human trafficking policies and procedures compatible with our own.
- Made available to all Bechtel employees, including those in Australia, Canada, and the United Kingdom, our online (with an option of instructor-led) course entitled “Modern Slavery Awareness.”
- Incorporated a third-party supply chain risk management tool that includes modern slavery and human trafficking among other elements.

h. Remediation

During the 2024 reporting period, the Reporting Companies did not identify any instances of modern slavery (including forced labor and child labor) or human trafficking in their operations or supply chain. As a result, there is nothing to report with respect to measures taken by the Reporting Entities to remediate (i) instances of any forced labor or child labor, or (ii) the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labor or child labor in their activities and supply chains.

5. Industry Engagement

We understand the importance of engaging and collaborating with the broader engineering and construction industry to promote best practices and elevate standards to prevent modern slavery and human trafficking. Bechtel was one of the founding members of [Building Responsibly](#), a group of engineering and construction companies working together to raise the bar in promoting the welfare of workers across the industry.

Bechtel works with other members to identify additional implementation tools such as effectiveness assessments for site-specific project grievance mechanisms. Bechtel has also included the Worker Welfare Assessment Tool as a resource for developing Project Mental Health Plans.

In 2024, Building Responsibly continued to facilitate peer learning opportunities for companies to share their implementation successes and challenge areas as well as engage with others in the field, offering training and technology options to engage workers. The main peer learning topic in 2024 was a series on Responsible Recruitment. Building Responsibly also held its Bi-Annual Members’ Meeting and Building Responsibly Forum in Paris to spotlight critical issues and set ethical and sustainable labor practice goals for 2025.

Bechtel also serves as co-chair of the [Corporate Responsibility and Labor Policy Committee of the U.S. Council for International Business](#), an association of 300 U.S. multinational companies. The committee promotes policies and practices to international standard-setting bodies to strengthen governments’ responsibilities to develop and enforce legislation and regulation to prevent modern slavery and engage companies to share their experiences and best practices.

Bechtel Global Logistics (BGL), a discipline focusing on delivery of materials and equipment, works to raise awareness of human trafficking within the transportation industry and across multiple modes of transportation (e.g., ports, roads, etc.) by sponsoring regular discussions on the subject with the U.S. Exporters Competitive Maritime Council and various industry conferences, as well as encouraging BGL’s logistics service providers to share information, lessons learned, and methods they are employing to reduce the risk of human trafficking in the transportation and logistics industry.

We will continue to engage with diverse organisations to help advance a safer, healthier environment for all workers in the engineering and construction sector and other industries.

6. Process of Consultation

Because employees, officers, GBU managers, and several functional groups (e.g., Contracts & Procurement, Human Resources and Global Workforce Services, Ethics & Compliance, Sustainability) are responsible for applying Bechtel's policies against modern slavery and human trafficking, we established a cross-GBU and cross-functional group, the Taskforce on Human Trafficking and Modern Slavery (the "Taskforce"). Through the Taskforce, we share updates, ideas, and practices relating to modern slavery and human trafficking across Bechtel and support the development of goals and the implementation of relevant policies, principles, processes, and legislation. The Taskforce includes representatives of the five GBUs and representatives located in, or with responsibility over, the key regions in which Bechtel operates, including Australia, Canada, and the United Kingdom.

This statement was prepared in consultation with the Taskforce, the Corporate Manager of Sustainability, the Corporate Legal Department, the Heads of Legal for each of the relevant GBUs, and with select members of the Boards of BLTD, BMCL, BAPL, BCAPL, BWAPL, BCANDCO, and NOBC prior to review and approval by each of those Boards.

For and on behalf of Bechtel Limited:



David King, Director

For and on behalf of Bechtel Management Company Limited:



David King, Director

For and on behalf of Bechtel Australia Proprietary Limited:




Shaun Kenny, Director

For and on behalf of Bechtel Construction (Australia) Pty Ltd:



Shaun Kenny, Director

For and on behalf of Bechtel (Western Australia) Pty Ltd:



Nicholas E. Robertson, Director

This Report was approved pursuant to subparagraph 11(4)(b)(i) of the Canadian Modern Slavery Act by the boards of directors of BCANDCO and NOBC.

In accordance with the requirements of the Canadian Modern Slavery Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this report for the entity specified below. Based on our knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects, for the purposes of the Canadian Modern Slavery Act, for the financial year 1 January 2024 – 31 December 2024.

I make the above attestation in my capacity as a director of the board of directors of Bechtel Canada Co. (the "**BCANDCO Board**") for and on behalf of the BCANDCO Board.

I have the authority to bind Bechtel Canada Co.

Per: Martyn N. Daw
Full Name: Martyn N. Daw
Title: Director and Chair
Date: 5/27/2025

I make the above attestation in my capacity as a director of the board of directors of Northbech Co. (the "**NOBC Board**") for and on behalf of the NOBC Board.

I have the authority to bind Northbech Co.

Per: Martyn N. Daw
Full Name: Martyn N. Daw
Title: Director
Date: 5/27/2025

Appendix I: Content Cross-Referenced to MSA Reporting Criteria

U.K. Modern Slavery Act 2015, Section 54(5)'s Recommended Reporting Criteria	Australia Modern Slavery Act 2018, Section 16(1)'s Mandatory Reporting Criteria	Canadian Modern Slavery Act, Section 7(1) and (2)'s Reporting Criteria	Sections Addressing Criteria
➤ The organization's structure, its businesses, and its supply chains	<ul style="list-style-type: none"> Identify the reporting entity Describe the structure, operations, and supply chains of the reporting entity Describe the process of consultation with (i) any entities that the reporting entity owns or controls and, (ii) for joint modern slavery statements, the entity giving the statement 	➤ The entity's structure, activities and supply chains	<p>The Reporting Companies</p> <p>Our Business Risk Assessment</p> <p>Due Diligence, and Management</p> <p>Process of Consultation</p>
• Its policies in relation to slavery and human trafficking		➤ Its policies in relation to forced labor and child labor	<p>Policies Against Human Trafficking and Slavery</p> <p>Ethics and Compliance</p>
<ul style="list-style-type: none"> Its due diligence processes in relation to slavery and human trafficking in its businesses and supply chains The parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk 	<ul style="list-style-type: none"> Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes 	<ul style="list-style-type: none"> Its due diligence processes in relation to forced labor and child labor The parts of its business and supply chains that carry a risk of forced labor or child labor being used and the steps it has taken to assess and manage that risk 	<p>Risk Assessment</p> <p>Due Diligence and Management (and subsections)</p> <p>Upfront Risk Assessment and Mitigation Planning</p> <p>Supply Chain</p>
• Its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply	• Describe how the reporting entity assesses the	➤ How the entity assesses its effectiveness in ensuring that forced labor and child labor are not	<p>Foreign Migrant Workers</p> <p>Assessing Effectiveness by Audit and/or Adoption of</p>

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chains, measured against such performance indicators as it considers appropriate	effectiveness of such actions	being used in its business and supply chains. ➤ The steps the entity has taken during that year to prevent and reduce the risk that forced labor or child labor is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity	Compliance Plans (and subsections)
• The training about slavery and human trafficking available to its staff		➤ The training provided to employees on forced labor and child labor	Training & Awareness
		➤ Any measures taken to remediate any forced labor or child labor ➤ Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labor or child labor in its activities and supply chain	Remediation
	• Include any other information that the reporting entity, or the entity giving the statement, considers relevant		Industry Engagement