



# MODERN SLAVERY ACT STATEMENT 2022

## Reporting Entities and Consultation

This statement has been prepared by Fluor Corporation, a publicly traded, U.S.-domiciled company providing professional and technical services worldwide through various entities, including wholly owned subsidiaries and joint ventures.

This statement was developed in consultation with Fluor's relevant wholly owned subsidiaries to meet the requirements of both the UK Modern Slavery Act of 2015 and the Australia Modern Slavery Act of 2018. It has been posted on the Fluor Corporation website as required by the UK Act, and it has been submitted to the Australian Border Force as required by the Australian Act. This statement sets out the steps taken by Fluor for the year ended December 31, 2022, to prevent modern slavery in our business and supply chain, as well as our efforts to ensure the welfare of our workers.

### REPORTING ENTITIES

The reporting entities for this statement under the UK Modern Slavery Act of 2015 are:

- ▶ Fluor Limited, domiciled at 140 Pinehurst Road, Farnborough GU14 7BF. The Board of Fluor Limited approved this statement on March 21, 2023;
- ▶ Fluor International Limited, domiciled at 140 Pinehurst Road, Farnborough GU14 7BF. The Board of Fluor International Limited approved this statement on March 21, 2023; and
- ▶ Stork Technical Services UK Limited, domiciled at Norfolk House, Pitmedden Road, Dyce AB21 0DP, Aberdeen. The Board of Stork Technical Services UK Limited approved this statement on February 28, 2023.

The reporting entity for this statement under the Australia Modern Slavery Act of 2018 is:

- ▶ Fluor Australia Pty Ltd, domiciled at 168 St. George's Street, Perth, Western Australia 6000. The Board of Fluor Australia Pty Ltd approved this statement on April 10, 2023.

### CONSULTATION PROCESS

All Fluor Corporation policies, procedures, and codes of conduct are applicable to Fluor-controlled entities worldwide. Those policies, procedures, and codes, and this Modern Slavery Statement, are developed in consultation with the appropriate corporate functions both at the Fluor Corporation headquarters, and those functions within the reporting and other entities. This includes Human Resources; Legal; Health, Safety & Environment; Supply Chain; and Construction.

The Modern Slavery Statement is approved by the governing Board of each reporting entity and approved by the Governance Committee of the Board of Directors of the parent company, Fluor Corporation. It is signed on behalf of all reporting entities by the Fluor Corporation Chairman and CEO.

### Commitment

For more than 100 years, Fluor has had a steadfast determination to do the right thing. In all our dealings, Fluor is committed to the highest standards of integrity and ethical 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 ethics and integrity, read our annual [Sustainability Report](#) or visit the [Ethics and Compliance](#) webpage both available on [www.fluor.com](http://www.fluor.com).

Fluor strives to move beyond just strict compliance with laws and regulations by proactively approaching ethics issues such as worker welfare. We continually improve and enhance our compliance and ethics programs by monitoring evolving risks and benchmarking best practices in our company, our industry, and the global business community.

As a signatory to the UN Global compact, Fluor conducts its operations in a socially responsible, non-discriminatory manner, in the spirit of the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. We are similarly committed to implementing and enforcing effective systems and controls to provide confidence that modern slavery does not exist in our supply chain.

Fluor's commitment is fully aligned with the principles published by **Building Responsibly**, a global leader in improving worker welfare, and we are committed to, among other things, the following standards.

1. All workers, irrespective of their nationality, gender, ethnicity, social status, race, religion, or other protected characteristics, are treated fairly with regard to recruitment and employment practices. Further, the dignity of workers is protected and preserved, and inhumane treatment, abuse, and humiliating disciplinary action are not permitted.
2. 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.
3. The use of misleading or fraudulent practices during recruitment of employees is not tolerated, and charging recruitment fees to the employee is prohibited.
4. A clean, secure, safe, and healthy working environment is provided.
5. Worker accommodation standards contained in national and local regulations are considered as a baseline requirement.
6. All workers have unrestricted 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.
7. Wage payments are made regularly and on time, consistent with applicable law.
8. The legal rights of workers to choose whether or not to join third-party organizations, without fear of retaliation, coercion, or harassment, is acknowledged.
9. Through Fluor's Integrity Portal, a process is available for employees to report, without fear of retaliation, activity inconsistent with these commitments.

## Fluor's Business

Fluor is a global, publicly traded (NYSE) professional and technical services company, delivering engineering, procurement, and construction (EPC) projects worldwide. Headquartered in Irving, Texas, Fluor has approximately 40,000 employees and had a revenue of \$13.7 billion in 2022. Fluor's clients include leaders in energy, chemicals, life sciences, advanced technologies, mining, metals, infrastructure, and government agencies. More information can be found on our webpage at [www.fluor.com](http://www.fluor.com).

Fluor's business is divided into three primary segments.

- ▶ **Energy Solutions.** Fluor is a leading partner in the production of safer, cleaner, and sustainable energy solutions to meet the world's increasing energy demand by providing EPC services for the production and fuels, chemicals, liquefied natural gas (LNG), and nuclear power services markets. We also focus on the energy transition markets, including carbon capture, renewable fuels, waste-to-energy, green chemicals, and hydrogen.
- ▶ **Urban Solutions.** The urbanizing world needs reliable infrastructure, advanced technologies, life science innovations, ample resources, and sophisticated manufacturing. Fluor supports these needs with innovative EPC and professional staffing services supporting our clients in diverse industries including mining, metals, advanced technologies, manufacturing, life sciences, and infrastructure.
- ▶ **Mission Solutions.** Fluor supports U.S. Government customers in markets where there is a significant national interest. This includes national security, energy security, environmental management of federal nuclear sites, nuclear operations, advanced research, and disaster and humanitarian assistance.

## Modern Slavery Risks within our Supply Chain

Fluor works with clients in diverse industries and geographies worldwide to design, construct, and maintain complex and challenging capital projects. Fluor's supply chain comprises several thousand suppliers and subcontractors from more than 60 countries, delivering materials, equipment, and services to hundreds of projects worldwide.

Because of this supply chain complexity, we employ a risk-based due diligence approach to the assessment of the potential for modern slavery and worker welfare violations in our supply chain. We give specific focus to projects and suppliers in high-risk geographic locations, especially with limited local labor supply, and where low-skilled, third-country migrant labor is employed in construction and other services. Additionally, we may be required by our client, or by local content laws, to use specific suppliers and contractors over which we may have only indirect and limited control and which we may not have the ability to fully vet. It is in these two areas where we believe there is the most risk of worker welfare violations and modern slavery, and we are vigilant in making sure these violations cannot and do not occur.

## Addressing the Risk: Policies and Procedures

Fluor employs a risk-based approach to addressing potential instances of modern slavery and worker welfare issues. We continuously assess our operations and procurement activities to verify that modern slavery does not exist in our supply chain or at any Fluor-controlled office or site.

### FLUOR

The welfare of our workforce is critical to Fluor successfully performing our work. Fluor clearly sets out our expectations for employees and management in our [Code of Business Conduct and Ethics](#) (Code of Conduct). The Code of Conduct clearly states that Fluor does not tolerate the use of child or forced labor or the trafficking in persons. Moreover, all employees must work to ensure that Fluor does not have suppliers, contractors, or other business partners who do so.

Fluor-led projects in high-risk geographies are required to have project-specific compliance plans for business ethics and worker welfare. Additionally, Fluor's Mission Solutions business segment also complies with the U.S. Government's Combatting Trafficking in Persons (CTIP) requirements.

We are a founding member of [Building Responsibly](#) whose purpose is to serve as the global standard on worker welfare for the engineering and construction (E&C) industry and encourage the adoption and application of the [Building Responsibly Worker Welfare Principles](#) by the global E&C industry.

### SUPPLIERS AND CONTRACTORS

Fluor seeks to do business with third parties who share our standards and values. Our suppliers and contractors are required to understand and comply with our [Business Conduct and Ethics Expectations for Suppliers and Contractors](#) (Supplier Expectations) and with the Building Responsibly Worker Welfare Principles – both of which address, among other issues, the health and safety of workers, fair employment practices, and respect for the dignity of each person. Fluor's suppliers and contractors are also expected to hold their suppliers to the same high standards and are contractually obligated to require their suppliers to comply with Fluor's Supplier Expectations.

Fluor screens its direct suppliers for worker welfare concerns such as child or forced labor. Additionally, our pre-qualification questionnaire form for new 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.

Fluor's suppliers fall into three categories:

- ▶ **Strategic Suppliers**, which are among the largest global corporations, and which have worker welfare policies and/or due diligence programs in place;
- ▶ **Evaluated Suppliers**, which have worked previously on Fluor projects, and which have met all performance standards set by Fluor, including adherence to our Supplier Expectations; and
- ▶ **Pre-qualified Suppliers**, which have not previously worked on Fluor projects and which receive a greater level of scrutiny in the pre-qualification process.

Fluor's subcontractors are similarly vetted and evaluated on a project-by-project basis, specific to the scope of work and location. Just as Fluor develops its own project-specific labor plans to cover areas such as worker welfare, our subcontractors develop their own labor plans in accordance with the local labor laws and requirements and Fluor's expectations, subject to review and approval by Fluor and/or our client. Specific criteria and predetermined weightings can be ascribed to identified areas of risk, such as worker welfare, to ensure greater focus and attention is given to labor plans in locations where laws are not well established or migrant labor is employed.

We include adherence to our Supplier Expectations in our contract terms and conditions, and non-compliance can lead to sanctions up to and including termination. In the Human Rights and Employment Practices section of our Supplier Expectations, we clearly set forth our expectation that our suppliers and contractors:

- ▶ Pay their employees a living wage and expect the same from their supply base;
- ▶ Support and respect human rights and avoid complicity in human rights abuses, including 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; and
- ▶ Conduct all their operations in a socially responsible, non-discriminatory 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.

## REPORTING MISCONDUCT

Fluor's Code of Conduct and Supplier Expectations provide multiple avenues for our employees, suppliers, contractors, and other business partners to report any business conduct and ethics concerns, including human rights violations such as modern slavery. We take seriously any allegation that human rights have not been properly respected. All reports are fully investigated, and appropriate remedial actions are taken.

All concerns related to ethics and business practices, including working conditions and human rights, may be reported by phone from any Fluor location or project worldwide or through [Fluor's Integrity Portal](#). The Integrity Portal is managed by an independent third-party company; is available 24 hours a day, seven days a week with translation and interpretation support in over 150 languages; and allows for anonymous reporting.

Fluor Corporate Compliance handles all compliance and ethics investigations with oversight from the Chief Compliance Officer. Fluor strictly prohibits retaliation against anyone who makes a good faith report.

## TRAINING

Training is one of the most critical components for success of an ethics and compliance program, including issues related to human rights and modern slavery. Fluor's training has a multi-topic curriculum to ensure employees understand the risks that apply to their positions and comply with the related Fluor policies and procedures.

In 2022 we continued the Human Trafficking and Modern Slavery training and certification program. We have now provided training to employees in our Supply Chain, Human Resources, Construction, and Sales and Marketing functions. This training is intended to help those who engage directly with our clients, suppliers, and contractors to better identify and mitigate potential modern slavery risks in both our sales and operations.

In 2022, we also continued our employee awareness campaign on modern slavery, initiated in 2017, which includes intranet articles, employee discussion topics, and messages for craft personnel at projects globally.

## Assessing the Effectiveness of Our Policies and Procedures

Fluor assesses the effectiveness of our policies and procedures through various mechanisms. Fluor's Compliance & Ethics Committee reviews the trends and dispositions of issues reported through the Integrity Portal. That information helps to inform Fluor of any systemic issue and allows us to make any changes to our policies and procedures to address those concerns. We publish aggregated information about issues reported through the Integrity Portal and in our Sustainability Report.

Fluor annually audits all of its projects and work sites to assure compliance with our health, safety & environmental (HSE) practices and standards. These audits include living conditions on sites where accommodation is provided, safety and worker concerns about safety, and working conditions such as adequate rest, access to hygiene facilities, and water. Even on projects or sites that are not controlled by Fluor, we audit annually the site conditions.

Fluor's Supply Chain function also conducts periodic quality reviews of suppliers for a range of issues. Through these reviews and our up-front vetting of our suppliers, we can identify potential worker welfare concerns and address them in a timely manner.

## Further Steps to Prevent Modern Slavery in Our Supply Chain

Fluor's commitment to improve worker welfare and combat modern slavery is integral to our business practice. We know that we cannot achieve success in this commitment without the cooperation of our clients, our suppliers, and other business partners and stakeholders. We know this is a long-term commitment that requires continuous review, improvement, and enforcement of our policies and processes. Thus, we will continue to engage with all our partners to identify potential risks and implement policies to mitigate them.

As in years past, Fluor will continue our ongoing review of our sales, operations, procurement, and contracting activities and procedures and update them as appropriate. We will:

- ▶ Review our worker welfare policies and procedures;
- ▶ Roll out our revamped worker welfare training; and
- ▶ Continue and strengthen our public engagement on worker welfare.

Finally, because we believe in the power of collective action, we will also continue to provide leadership in our industry in support of further improving worker welfare practices and eliminating modern slavery. We will continue to emphasize the importance of collaboration with others to address the multifaceted challenges of worker welfare. In 2022, we continued to serve on the Board of Building Responsibly, a collaborative effort with 15 other engineering and construction companies that addresses worker welfare issues.

As we have for over 100 years, Fluor remains committed to being a leader in addressing worker welfare issues in our industry in 2023 and beyond.



David E. Constable  
Chairman and Chief Executive Officer  
May 2023