



JOINT Modern Slavery

STATEMENT

01 January 2023 – 31 December 2023

1 REPORTING ENTITY

This is a Joint Modern Slavery Statement of Kellogg Brown & Root Pty Ltd (KBRPL) (ABN 91 007 660 317), and Frazer-Nash Consultancy Limited (Australian operations) (ABN 20 578 377 332) (FNCL), each a reporting entity pursuant to the Modern Slavery Act 2018 (Cth) and each a wholly-owned subsidiary of KBR, Inc.

KBR operates through various entities globally that share the same policies and processes and the same or similar business systems.

In 2021 FNCL was acquired by KBR, Inc. During this Reporting Period, the FNCL Australian operations business unit of FNCL continued to transition towards and build on its existing procurement processes to align with the global KBR processes. It is anticipated in the next reporting period that FNCL will have fully integrated into the global KBR business operations.

The procurement activities of KBR are centre led, locally deployed. Accordingly, this statement is a consolidated description of the actions taken to address modern slavery risks by KBR and has been published as a Joint Modern Slavery Statement of KBRPL and FNCL in accordance with section 14 of the Modern Slavery Act 2018 (Cth).

Throughout this Statement, except as otherwise stated, the terms “KBR”, “we” and “our” are used to refer collectively to KBR Inc. and its subsidiaries, of which KBRPL and FNCL are two wholly-owned subsidiaries.

This statement is for the year 1 January 2023 to 31 December 2023 (“Reporting Period”).

2 OUR BUSINESS, OPERATIONS AND SUPPLY CHAIN

KBR delivers science, technology and engineering solutions to governments and companies around the world. KBR employs approximately 34,000 people performing diverse, complex and mission critical roles in over 30 countries.

KBR is proud to work with its customers across the globe to provide technology, value-added services, and long-term operations and maintenance services to ensure consistent delivery with predictable results. At KBR, We Deliver.

KBR’s capabilities and offerings include the following:

- scientific research such as quantum science and computing, health and human performance, materials science, life science research and earth sciences
- defence systems engineering such as rapid prototyping, test and evaluation, aerospace acquisition support, systems and platform integration and sustainment engineering
- operational support such as space domain awareness, command, control and communications; human spaceflight and satellite operations, integrated supply chain and logistics and military aviation support
- information operations such as data analytics, mission planning systems, artificial intelligence and machine learning
- technology such as licensing of proprietary industrial process technology, advisory services focused on energy transition and digitally-enabled asset optimisation solutions.

KBR provides these and other services to a diverse customer base, including domestic and foreign governments, international and national integrated energy companies and industrial companies.

The diagram in Figure 1 is a depiction of where KBR conducted business operations globally as of 31 December 2023.

Our Vision

We bring together the best and brightest to deliver technology and solutions that help our customers accomplish their most critical missions and objectives. In doing so, we strive to create a better, safer and more sustainable world.



34,000 EMPLOYEES WORLDWIDE

9,000 unconsolidated joint venture employees at the end of 2023



\$7.0B 2023 REVENUE



Our Global Footprint

KBR is proud to work with its customers across the globe to provide technology, value added services, and long-term operations and maintenance services to ensure consistent delivery with predictable results. At KBR, We Deliver. The map above shows our office and project locations at the end of 2023.

Figure 1 Our global footprint

About KBR

KBR has over 5,000 vendors/suppliers globally. Through KBR's subsidiaries and joint ventures, KBR provides direct and indirect engagement to its customers of labour, goods, and services.

KBR's indirect engagement consists of KBR subcontractors providing the labour, goods, and services to KBR and/or their customers. KBR has a wide variety of global supply chains that are dependent on the type of project, KBR's role in the project, and the project's geographic location. KBR takes a risk-based approach to assessing human rights vulnerabilities in its supply chain, both during the onboarding process and throughout the project cycle.

Certain subcontractors and lower tier subcontractors in high-risk countries are the focus of enhanced due diligence efforts to mitigate risks regarding human rights abuses.

The treatment of foreign and/or low-skilled employees working for KBR subcontractors in host countries is a particular area of focus for KBR and is addressed through its Combatting Trafficking in Persons (CTIPS) and Modern Slavery Act (MSA) programmes.

KBR Operations in Australia

KBRPL is a wholly-owned subsidiary of KBR, Inc. (NYSE: KBR) a Delaware corporation. FNCL is a wholly-owned subsidiary of Kellogg Brown & Root Ltd based in Leatherhead, UK and KBRL, is also a wholly owned subsidiary of KBR, Inc. KBR, Inc. acquired FNCL in October 2021 and is undergoing its transition and integration period which requires consideration of the complexities of operating across the UK and Australia. As FNCL operates in both UK and Australia, this statement refers only to the FNCL Australian operations business unit activities.

KBRPL has three subsidiaries (not considered Reporting Entities for the purpose of this Joint Statement). FNCL does not have any subsidiaries in Australia.

Figure 2 below provides an overview of the KBRPL and FNCL corporate structure below, relevant to this Joint Statement:

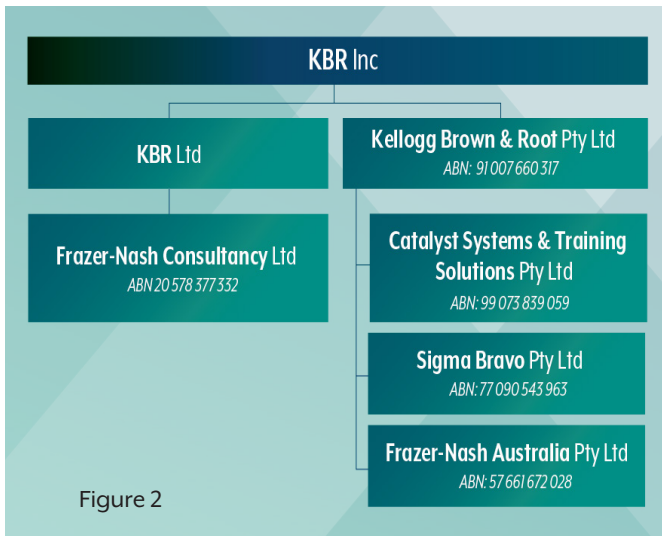


Figure 2

KBRPL has approximately 1730 employees across Australia with office presences in Brisbane, Sydney, Canberra, Melbourne, Adelaide and Perth.

FNCL has office presences in Adelaide, Melbourne, Canberra and Sydney. During this Reporting Period, KBRPL and FNCL commenced sharing office spaces in Canberra, Sydney and Brisbane. As part of the ongoing transition in the coming year more of the offices will be combined.

KBR operations in Australia is focused on delivery of differentiated professional solutions and services covering domains such as engineering, project and program management, business/commercial support, engineering design, training design and delivery and Integrated Logistical Support.

In Australia, KBR delivers its core offerings predominately to the Commonwealth of Australia (Department of Defence), State Governments (and State Government entities such as water utility providers), local government and infrastructure constructors/managing contractors.

KBR and FNCL’s supply chain comprises approximately 1,000 Australian active suppliers providing various services to KBRPL. The companies within our Supply Chain range in size from large multi-national/international companies to small-medium and micro businesses. The KBRPL supply chain includes several indigenous suppliers. The types of services procured by KBRPL and FNCL can be broadly categorised into three categories:

- **Project/Program Subcontractors and Subconsultants:** these are organisations providing services to KBRPL and FNCL in direct support of a project or program of work being executed by KBRPL and FNCL to a client or end-client. Typically, services are delivered under back-to-back (or broadly back-to-back) contracting arrangements. In respect of our services delivered to Defence these include provisions for compliance with national security and confidentiality obligations.
- **Internal Services:** these are organisations providing services to KBRPL and FNCL as part of our corporate activities. Typically, services include professional consultancy, recruitment, training, corporate development activities (bids and proposals) and internal compliance advice.

- **General Corporate Procurement:** these are organisations providing general corporate procurements to KBRPL and FNCL. Typically, services include office consumables, cleaning, real estate, travel and corporate memberships.

Across the three categories above, a significant majority of the services are delivered by Australian companies in Australia with expenditure for Project/Program Subcontractors and Subconsultants representing circa 90% of supply chain expenditure. The nature of the professional services results in the 'supplies' being direct with no or little indirect content (a report produced by a design engineer would be direct, the paper used to print the report would be indirect). There are services related to elements such as travel which may contain an overseas component and would comprise foreign content.

3 OUR MODERN SLAVERY RISKS IN THE OPERATIONS AND SUPPLY CHAINS (OF THAT REPORTING ENTITY AND/OR ANY OTHER ENTITIES OWNED OR CONTROLLED)

Both KBRPL and FNCL's risk of engaging in modern slavery practices or inadvertently procuring services from a supplier who has engaged in modern slavery is considered to be low. Neither KBRPL's nor FNCL's Australian operations appear to trigger any of the high-risk areas or indicators for modern slavery. This assessment is based on the below risk analysis:

- **Entity and Corporate Governance:** KBR minimises the risk of modern slavery through our corporate Code of Business Conduct and our Supplier Code of Conduct, Global Human Rights policy, and our strong anti-corruption and business ethics governance framework. All employees are required to certify on an annual basis their compliance with the Code of Business Conduct, and all subcontractors and suppliers to KBR must adhere to the Supplier Code of Conduct. Compliance with both Codes is overseen by the CEO and KBR Inc.'s Board of Directors.
- **Corporate and Business Operations:** KBRPL and FNCL provide services and do not deliver products. These services are predominately delivered by degree qualified professionals. In addition, given our client or end-clients comprise both Commonwealth and State government departments or authorities, the additional audit and oversight obligations (including national security obligations) further prevent and mitigate modern slavery practices or behaviours.
- **Employee Relations:** KBRPL and FNCL's workforce is predominately professionals (engineers, project managers, commercial/procurement professionals, etc). KBRPL's employment agreements are routinely assessed against National Employment Standards and industry best practice. KBRPL and FNCL do not substantially operate under the awards system relying on common law contracts given the majority of employees are degree qualified and members of relevant professional organisations. Our standard employment agreements meet the current Australian standards and are consistent with industry and market practice here in Australia. The type and complexity of the services we offer to our clients prevent the use of unskilled labour or foreign labour. All employees are required to complete annual Ethics training, which also includes training regarding human rights.
- **Industry and Geography:** The industry sectors that we operate within Australia are not generally considered to be susceptible to the use of vulnerable labour categories or persons. In the Defence sector the standards set to meet qualification levels, experience and national security requirements prevents the use of at risk labour. As most of our services are delivered in Australia by persons authorised to work in Australia for government clients, the geographic risks associated with modern slavery are considered to be extremely remote for KBRPL and FNCL. All subcontractors who are engaged as part of our business, undergo extensive vetting requirements that are undertaken by our Supply Chain.

4 OUR ACTIONS ADDRESSING RISKS, DUE DILIGENCE AND REMEDIATION PROCESSES

In Australia, KBR requires all employees (and direct contractors) to certify their compliance with the KBR Code of Business Conduct as part of its annual ethics training. This is a condition of employment. This annual certification encompasses employee's adherence to, among other things, avoidance or behaviours or practices that are inconsistent with the Code of Business Conduct.

In addition to our employees, KBRPL routinely assesses our supply chain against our Code of Business Conduct, the Supplier Code of Conduct, and the Global Human Rights policy which include corporate obligations on our suppliers around ethics, human rights, bribery and corruption and human trafficking.

As a global business we are very sensitive to the external factors which impact our commercial and corporate operations. As such, at registration, all suppliers are required to sign a declaration confirming their conformance with our Supplier Code of Conduct.

In addition to suppliers declaring conformance with the Supplier Code of Conduct, KBR ensures its suppliers are aware of KBR's zero tolerance position with regards to child labour, people trafficking and modern slavery. Within KBR's standard subcontract terms and conditions, suppliers warrant and agree that they abide by the same obligations imposed on KBR by the Modern Slavery Act 2018 (Cth).

In this Reporting Period:

- KBRPL has sought to ensure that all third party contracts contain clauses which acknowledge the requirements of the Modern Slavery legislation irrespective of whether the third party is a supplier to KBRPL or the customer.
- The management of FNCL's Australian Operations reported quarterly in an internal period management report with respect to incidences of modern slavery. No incidences or suspected incidences were reported.

5 OUR ACHIEVEMENT AND EFFECTIVENESS OF TAKING ACTIONS

As stated, both KBRPL and FNCL are wholly owned by KBR Inc. KBR globally takes a risk-based approach to assessing human rights vulnerabilities in its supply chain. Certain subcontractors and lower tier subcontractors in high-risk countries are the focus of enhanced due diligence efforts to mitigate risks regarding human rights abuses.

- KBR acknowledges its corporate responsibility to respect human rights as delineated in the United Nations Guiding Principles on Business and Human Rights and in its Global Human Rights policy. KBR has adopted Human Rights as part of its Governance Corporate Pillar in its sustainability platform. KBR further recognises that modern slavery is a heinous crime that affects communities and individuals across the globe.
- KBR has existing policies and procedures in relation to Human Rights that include acknowledgement of the principles contained in the United Nations Universal Declaration of Human Rights. KBR's Global Human Rights policy, sets forth KBR's commitment to ensure its operations and supply chain are free from modern slavery, human trafficking and forced labour, and its commitment that the Company, its subsidiaries, employees, its suppliers, and its partners will comply with all applicable laws.
- KBR is committed to the fair treatment and protection of migrant workers in accordance with the Dhaka Principles for Migration with Dignity. Furthermore, KBR expects its subcontractors, suppliers and business partners to enact and enforce similar migrant worker policies and protections.
- KBR's Code of Business Conduct revised in April 2023, recognises that promoting human rights is a corporate responsibility and requires all of its employees to adhere to the Code of Business Conduct. All employees are required to complete annual Ethics training, which also includes training regarding human rights.

Additionally, a large portion of the workforce is also required to complete separate CTIPS training on certain U.S. Department of Defense contracts.

- KBR's Global Procurement & Supply Chain Management Policy, as well as the Sustainable Supply Chain Charter set out the standards and goals to be adopted in the procurement of all goods, services and materials across all KBR activities. This includes commitments in respect of Human Rights and Labor Practices, that align to KBR's Sustainable Procurement Policy and its Supplier Code of Conduct.
- KBR has established an Ethics Hotline, where employees and others can report suspected inappropriate or unethical behaviour or human rights abuses, misconduct or violations of the Code of Business Conduct. KBR engages a third-party vendor to manage the Ethics Hotline, which permits reporters to maintain their anonymity.
- KBR's Legal Department (through its Business Integrity team) promptly and thoroughly investigates any report that may include indications of human rights abuses and contacts the appropriate authorities when appropriate.
- KBR's Supplier Code of Conduct affirms that KBR has zero tolerance for child or forced labour and trafficking in persons and requires suppliers to adhere to these principles.
- KBR conducts CTIPS/MSA audits/inspections of certain key subcontractors that include interviews and surveys of subcontractor employees, housing inspections, and prevailing wage reviews.
- KBR conducts restricted party screening on subcontractors and vendors to ensure KBR is not doing business with entities that are flagged for designated human rights abuses or other watchlists/sanctions.
- KBR conducts due diligence on certain business partners that include reviewing any derogatory information concerning human rights abuses when required.

During 2023, KBR delivered its online training programme to 50 'Tier 1' suppliers across its non-US businesses to raise awareness in identifying and combatting modern slavery in the supply chain. This is the third consecutive year that KBR has offered modern slavery training across its non-US businesses, with a 54% of targeted suppliers completing the training over that period.

- A desktop audit was then conducted on the identified 50 suppliers and subcontractors who specifically work with KBR in Tier 1, Tier 2, Tier 2 Watchlist, Tier 3 and Special Case countries (according to the US Department of State). Since its inception in 2020, 44% of targeted suppliers have now been audited.

6 OUR PROCESS OF CONSULTATION

KBRPL continually consults with its wholly owned subsidiaries and entities through each of KBRPL's major business units, Government Solutions & Infrastructure Solutions. KBRPL as provided in Figure 2 has three subsidiaries; Sigma Bravo Pty Ltd, Catalyst Australia Pty Ltd and Frazer-Nash Australia Pty Ltd. Each of these subsidiaries perform their procurement activities in the same manner and requirements of KBRPL and are governed by the same policies and procedures detailed herein.

FNCL (Australian operations) does not control other entities and therefore this criteria is not applicable for FNCL in relation to this Joint Statement.

7 OUR COMMITMENT AND OTHER RELEVANT INFORMATION

KBR is undertaking further steps to improve our oversight of our own project sites, our supply chains and our subcontractors to ensure workers being abused or exploited; and to monitor (and where necessary) reassess risks. KBRPL:

- will work towards implementing its strategic plan for conducting physical subcontractor and project site CTIPS/MSA inspections that include checks of housing, passports, and treatment of their employees through random interviews without subcontract management present. As part of these interviews, employees are asked a series of questions specific to the recruiting process in order to determine if any potential CTIPS/MSA violations have occurred;
- aims to conduct at least 25 further in-person inspections at project sites within Europe, the Middle East and Africa;
- is in the process of aligning suppliers' contractual conditions with the international guidance standard, ISO 20400, ensuring KBR maintains robust ethical and responsible procurement practices;
- will continue to implement the rollout of its online modern slavery training programme;
- as a result of issues highlighted during previous inspections, is in the process of producing a detailed modern slavery audit guide for staff, when conducting future in-person CTIPS interviews;
- is continually reviewing and, where necessary, updating our processes for appointing potential supply chain providers;
- is conducting further internal reviews to ensure that our systems contain appropriate processes to protect lesser skilled workers engaged in overseas locations;
- is providing ongoing training materials to be given to employees and certain key suppliers about modern slavery and trafficking in people, and referring them to our ethics hotline to report any concerns.

With KBR's operations and supply chains located in some high-risk countries and environments, the organisation and its leadership are fully aware of the challenges faced in such circumstances. As a result, the company takes a pro-active stance with educating subcontractors and suppliers operating within these regions, in order to mitigate risk. KBR focusses its efforts on training and auditing of modern slavery in the supply chain to ensure that its importance is embedded and aligned with our global policies and practices. As our approach to modern slavery auditing matures, KBR will seek enhancements to further automate and digitise supplier engagement in this regard.

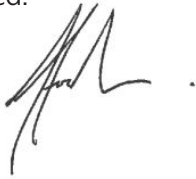
From 2024/25, Modern Slavery Act compliance will reside under the umbrella of Global Sustainability, as one of KBR's Environmental, Social and Governance (ESG) focus areas. KBR's Corporate Sustainability team directs the development and implementation of its modern slavery prevention strategy working with each of the group's business areas, aligning with the principles of accountability, good stewardship and integrity.

8 APPROVAL OF STATEMENT

This is the Modern Slavery Statement of Kellogg Brown and Root Pty Ltd and Frazer-Nash Consultancy Limited (Australian operations) for year ending 31 December 2023, having been agreed by each company's Board of Directors on or around 28 June 2024 and is submitted in accordance with Section 13 of the Modern Slavery Act 2018 (Cth).

Kellogg Brown & Root Pty Ltd


Signed:



Aaron Fowler
Company Director

Frazer-Nash Consultancy Limited

Signed:



Rupert Bridges
Company Director