



# JOINT Modern Slavery STATEMENT

1 January 2024 – 31 December 2024

## 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 completed its transition to align with the global KBR processes.

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 2024 to 31 December 2024 (“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 38,000 people worldwide with customers in more than 80 countries and operations in over 29 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; and
- 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 2024.



**38,000**  
**EMPLOYEES**

+ 10,000  
unconsolidated  
joint venture  
employees

At the end of  
fiscal 2024



**\$7.7B**  
**REVENUE**  
in fiscal  
2024



**CUSTOMERS**  
in more than  
**80**  
**COUNTRIES**



**OPERATIONS IN**  
**29**  
**COUNTRIES**

## 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 fiscal 2024.

### About KBR

KBR has approximately 6,500 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.

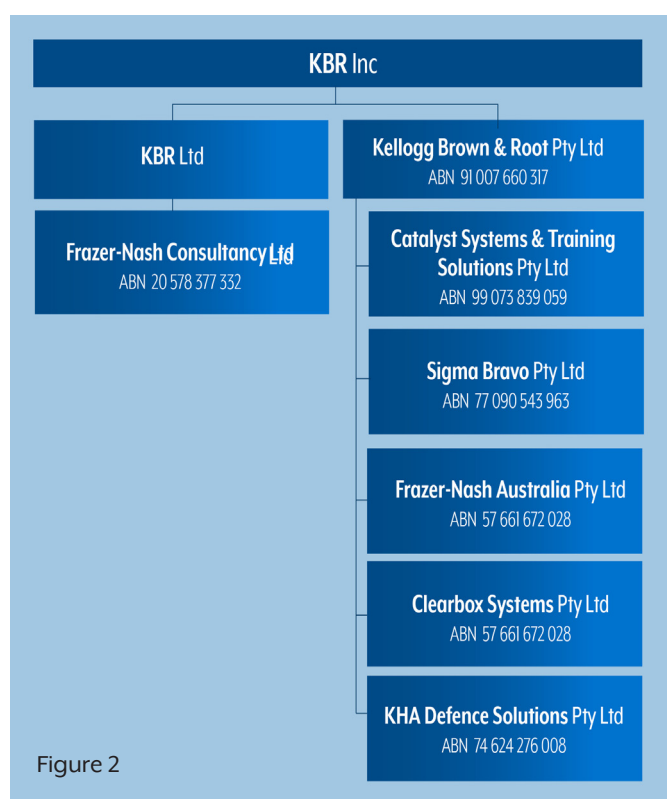


## KBR Operations in Australia

The ultimate parent company of KBRPL is KBR, Inc. (NYSE: KBR), which is a Delaware corporation that is headquartered in Houston, Texas, USA. FNCL is a wholly-owned subsidiary of Kellogg Brown & Root Ltd based in Leatherhead, UK. As FNCL operates in both UK and Australia, this statement refers only to the FNCL Australian operations business unit activities.

KBRPL has five 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:



KBRPL has approximately 1730 employees across Australia with KBRPL and FNCL sharing offices in Brisbane, Sydney, Canberra, Melbourne, Adelaide and Perth.

KBRPL's and FNCL's operations in Australia are 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, KBRPL and FNCL 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.

KBRPL's and FNCL's supply chain comprise approximately 1,000 Australian registered suppliers providing various services to KBRPL and FNCL. 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 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's 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 certain 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.
- KBRPL began planning the roll out of KBR's Awareness training on combatting Modern Slavery. This training has been offered across other parts of the business globally since 2021, with year-on-year increase in participation.

## 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, its employees, its suppliers, and its partners will comply with all applicable laws. Our human rights vulnerabilities are assessed at the board level and form part of our Enterprise Risk Management process
- 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 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. KBR's Sustainable Supply Chain Charter aligns suppliers' sustainability performance with the international guidance standard, ISO 20400 and includes commitments in respect of Human Rights, labour rights and fair operating practices, that align to KBR's Sustainable Procurement Policy and its Supplier Code of Conduct. The Charter is also supported by annual sample desktop audits across non-US suppliers, ensuring KBR maintains visibility of its supply chains' ethical procurement practices and actions to address the risks of modern slavery
- 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 indicate of human rights violations and contacts the appropriate authorities when necessary.
- KBR's Supplier Code of Conduct reinforces KBR's zero tolerance for child or forced labour and trafficking in persons and requires suppliers to fully comply with 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 watchlist/sanctions.
- KBR conducts due diligence on certain business partners that include reviewing any derogatory information concerning human rights abuses when required.
- KBR has developed digital tools to support supply chain interviews, audits and inspections, with a detailed modern slavery audit guide for staff to use when conducting in-person CTIPS interviews.
- A desktop audit was conducted on 42 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).
- During 2024, KBR conducted 40 full in-person CTIPS interviews at project sites in seven countries across Europe, the Middle East and Africa. Interviews were carried out at all different levels of the workforce from site management to chefs and cleaners. The outcome of these site audits has ensured that KBR's overseas suppliers are compliant with the organisation's rigorous standards.

## 6 OUR PROCESS OF CONSULTATION

KBRPL continually consults with its wholly owned subsidiaries and entities through each of KBRPL's major business units, Australian Defence and Security Solutions & Infrastructure Solutions. KBRPL as provided in Figure 2 has five subsidiaries. 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 these criteria are not applicable for FNCL in relation to this Joint Statement.

## 7 OUR COMMITMENT AND OTHER RELEVANT INFORMATION

KBR is undertaking further steps to improve oversight of our own project sites, supply chains and subcontractors to ensure workers are not being abused or exploited; and to monitor (and where necessary) reassess risks. KBR globally:

- will continue 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 further in-person inspections at project sites within Europe, the Middle East and Africa;
- will continue to implement the rollout of its online modern slavery training programme;
- 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 focuses 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.

KBR's Modern Slavery Act compliance resides 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 & Root Pty Ltd and Frazer-Nash Consultancy Limited (Australian operations) for year ending 31 December 2024, having been approved by each of the boards of those two reporting entities. The board of Kellogg Brown & Root Pty Ltd approved this statement on 16 June 2025. The board of Frazer-Nash Consultancy Limited approved this statement on 23 June 2025.

### **Kellogg Brown & Root Pty Ltd**

Signed:



Aaron Fowler

Company Director

### **Frazer-Nash Consultancy Limited**

Signed:



Rupert Bridges

Company Director