



# SUSTAINABLE SUPPLY CHAIN CHARTER



KBR Sustainable Supply Chain Charter sets out the objectives and targets to be adopted in the procurement of all goods, services, and materials across all KBR activities. The aim of the Charter is **to provide a framework** for the Sustainable Supply Chain Commitments (Appendix A), that aligns to the Sustainable Procurement Policy and Supplier Code of Conduct (CoC) and KBR Key objectives.

The process of embedding environmental, social and governance responsibilities applies to all KBR operations and sets out the expectations required of our supply chain; and the support required by KBR to deliver its strategic and business objectives.

## MISSION STATEMENT

Our goal is **to build strength through collaboration and partnerships**, engaging our global supply chain in the development and delivery of our environmental, social and governance objectives. These are aligned to the 12 principles of Sustainable Procurement in *ISO20400* across the following 7 pillars: **organizational governance, human rights, labor practices, the environment, fair operating practices, consumer issues, community involvement and development.**

## COMMITMENTS

The aim of the KBR Sustainable Supply Chain Charter is **to minimize risk, enhance reputation, meet legal requirements, and build supply chain resilience and responsibility** in delivering environmental, social and governance goals and commitments.

Our staff and supply chain are expected to abide with the commitments set out in the CoC, we aim to assist and provide training to assist adherence.

KBR will consider deselection of suppliers only after significant breach of regulatory requirements.

All organizations in the KBR supply chain are **required to provide access to transparent and robust data and information** relating to their environmental, social and governance approach. This shall include relevant plans, targets, and timely response to information requests, responding to surveys which demonstrate adoption of recognized best practice and the *ISO20400* guidance.



## KBR SUSTAINABLE SUPPLY CHAIN OBJECTIVES & TARGETS

### Phase 1: Ongoing Actions from 2022

- i. Alignment to ISO20400; implementation of the overarching strategy, processes; leveraging existing good practice in all regions to embed sustainable procurement into KBR Procurement & Supply Chain management.
- ii. Monitor Sustainable Supply Chain maturity across Tier 1 suppliers.
- iii. Build and embed Sustainable Supply Chain management tools and training for KBR procurement and supply chain staff and suppliers.
- iv. Annually collect environmental, social and governance data from across the supply chain.

### Phase 2: Action to progress by 2025

- i. Assess and evaluate sustainability requirements in contracts and proposals adopting a risk-based approach.
- ii. Benchmark supply chain sustainability using Industry recognised tools (EcoVadis assessment/ ISN & KBRS Questionnaire responses against KBR Sustainable Supply Chain KPI) in line with the following targets <sup>(1)</sup>:
  - o 35% of suppliers benchmarked <sup>(2)</sup> by 2025.
  - o 50% of suppliers benchmarked <sup>(2)</sup> by 2027.
- iii. Launch KBR Sustainable Supplier Awards to encourage innovation and recognize achievements.
- iv. Establish a continual improvement agenda for supplier sustainability (benchmark scores) using supplier audits, tracking sustainability in contracts, tracking improvement in supplier sustainability benchmark scores and third-party review of KBR alignment with ISO20400.

*'As the Executive Global Supply Chain Sponsor, I will oversee the delivery of this Charter and its objectives and ensure integration across our business not only in regard to our supply chain, but also through the decisions we as KBR make, relating to those we work for, and with'.*

**SIGNED:** Byron Bright  
 President & Executive Global Supply Chain Sponsor

**DATE:** February 28<sup>th</sup> 2025  
 Valid until Feb 2026 (annually reviewed)

Footnote

- 1. Completion of the Sustainability Benchmarking questionnaire shall not be construed that KBR advocates, condones or supports any unlawful employment practices
- 2. All suppliers within previous years spend footprint in scope





## APPENDIX A: KBR SUSTAINABLE SUPPLY CHAIN COMMITMENTS

PILLAR	OBJECTIVES
<b>Organizational Governance</b>	<p>We will follow ethical procurement processes and support fair competition. We will develop a decision-making process which embraces each of the 7 sustainable procurement pillars (within ISO20400), managing and mitigating the risks and impacts. We will embed controls to avoid these risks within our contracts, tenders, and investments, and we will create collaboration partnerships to build strength in sustainable procurement practices and promote innovation across our supply chain e.g. through network and sharing hubs, development of Sustainable Supply Chain best practice, adopting International Service Intermediary (ISI) and FCPA controls.</p> <p>We will expect our suppliers to adopt our Code of Business Conduct, and the commitments set out in the Charter as well as recognized health, environmental, quality and safety management systems e.g., ISO and other recognized systems (as appropriate to the scale and operation of the supplier).</p> <p>We expect suppliers to embed in their procurement and supply chain management practices.</p>
<b>Human Rights</b>	<p>We will actively review human rights issues through the adoption of due diligence, and in our practices assess the risks to human rights. We will develop an approach to avoid complicity, resolve grievances, assess likely occurrence of discrimination, and impacts on vulnerable groups. This will also include a review of civil and political rights, economic, social, and cultural rights, fundamental principles, and rights at work.</p> <p>Suppliers should support the principles of the Universal Declaration of Human Rights. They must avoid association with equipment or practices which violate these rights. We will assist our suppliers to improve their performance in the area of human rights and evaluate performance. Suppliers should ensure prohibition of harassment and abusive behavior.</p>
<b>Labor Practices</b>	<p>We expect suppliers to support International Labor Organization core conventions on labor standards.</p> <p>Our suppliers must set out clear employee relationship practices, conditions of work and social protection, health, and safety at work, including training in the workplace. Our suppliers must not use forced, bonded or compulsory labor and employees must be free to leave their employment after reasonable notice. Employees must not be required to lodge deposits, money, or papers with their employer.</p> <p>Particular focus should be given to:</p> <ul style="list-style-type: none"> <li>• Combating trafficking in Persons (CTIPS) /audit program (USG),</li> <li>• KBR Trafficking in Persons (TIPS) Policy applicable to all KBR suppliers,</li> <li>• UK Modern Slavery Act Statement (MSA) Policy/ audit program,</li> <li>• Supplier Code of Conduct (Zero tolerance for child labor/Human trafficking),</li> <li>• Ensuring the prohibition of child labor in accordance with the ILO Minimum Age Convention, We refuse to accept the use of child labor in the supply chain. No one should be employed who is below the legal minimum age for employment,</li> <li>• Ensuring the prohibition of forced labor in detail or referring to the ILO Forced Labor Convention (No. 29) and the Abolition of Forced Labor Convention (No. 105).</li> </ul>

## APPENDIX A : (CONTINUED)

PILLAR	OBJECTIVES
<b>Labor Practices</b> (Continued)	<ul style="list-style-type: none"> <li>Ensuring the prohibition of forced labor in detail or referring to the ILO Forced Labor Convention (No. 29) and the Abolition of Forced Labor Convention (No. 105)</li> <li>Provide regular employment and not use non-regular employment (fixed-term contracts, contracted labor) excessively.</li> </ul> <p>Where necessary we will assist our suppliers improve their performance in human rights related to modern slavery, human trafficking, and child labor. We will expect suppliers and contractors to align to KBR standards of labor practices and be accountable if failing to meet company standards regarding forced labor, modern slavery, and human trafficking.</p>
<b>Environment</b>	<p>We will ensure, through our actions, protection of the environment, which will include the prevention of pollution, management of waste, water and sourcing of sustainable resources, actions to promote a clean planet, protection of biodiversity and restoration of natural habitats.</p> <p>Our suppliers must set out how they minimize their impact on the environment and help enhance protection of vulnerable and engendered habitats, how they plan, manage, and deliver a net zero agenda in delivery of KBR activities.</p>
<b>Fair Operating Practices</b>	<p>We refuse to accept unlawful discrimination of any kind in working relations.</p> <p>Suppliers should not discriminate in hiring, compensation, access to training, promotion, termination of employment or retirement, including fair working hours working time in accordance with internationally recognized minimum standards of 48 regular hours of work per week, a rest period of at least 24 hours every seven days and maximum of 12 hours of voluntary overtime per week. They will be required to demonstrate their control of anti-corruption, responsible political involvement, fair competition. Suppliers will promote sustainability in their value chain, and respect for property rights.</p> <p>KBR does not tolerate discrimination regarding age, gender, and ethnic origin across all aspects of employment including recruitment, promotion, and remuneration in its supply chain.</p> <p>Suppliers must address Freedom of association and collective bargaining and establish means to facilitate these rights in situations where they are restricted under law (e.g. through the provision of works councils).</p>
<b>Consumer Issues</b>	<p>We require our suppliers to positively embrace fair marketing, factual and unbiased information, fair contractual practices, in the protection of consumers' health and safety, sustainable consumption, consumer service and support. This includes transparent processes for making complaints, dispute resolution, consumer data protection and privacy, access to essential services, education, and awareness.</p>
<b>Community Involvement &amp; Development</b>	<p>We will actively seek to engage and involve our community, and through our interactions educate, review opportunities to build local employment, skills development for social investment.</p> <p>Our suppliers should adopt practices for community engagement and education where they are undertaking KBR activities.</p>

## APPENDIX B : GOVERNANCE & ALLOCATION OF RESPONSIBILITIES

At KBR our people are at the heart of everything we do, and this philosophy extends throughout our global Supply Chain; we hold ourselves and our suppliers to high standards to protect the integrity of our supply chain and ethically deliver business resilience, growth and shared value for the benefit of all stakeholders, underpinned by positive environmental and social impact.

The KBR Procurement and Supply Chain Management (SCM) Policy establishes the foundational principles that govern KBR's SCM activities and deliver a business integrated, market aware, and sustainable strategic sourcing function. The SCM policy also provides those who interface with SCM, the foundational requirements of procurement actions, giving them a better understanding of their role supporting SCM.

The following key roles outline the main roles and responsibilities:

Role	Responsibilities	Supply Chain Stakeholder
<b>Sponsorship &amp; Approval</b>	<ul style="list-style-type: none"> <li>Oversee delivery of the Charter and its objectives.</li> <li>Ensure integration of the Charter delivery Plan across KBR procurement business.</li> </ul>	President & Executive Global Supply Chain Lead
<b>Direction &amp; Support</b>	<ul style="list-style-type: none"> <li>Review and approve Business Segment integration of the Sustainable Supply Chain delivery plan actions.</li> <li>Assist in the alignment of the Sustainable Supply Chain agenda with Business Segment strategy and objectives.</li> </ul>	Head of Misson Tech Procurement,
		Head of STS Procurement, Snr Director Corporate Procurement
<b>Strategy &amp; Reporting</b>	<ul style="list-style-type: none"> <li>Establish strategy, targets, tools and support required to embed and deliver the Sustainable Supply Chain Charter and agenda.</li> <li>Identify and deploy guidance and support.</li> <li>Annually train all Procurement and Supply Chain teams in sustainable procurement procedures.</li> <li>Track progress of the Sustainable Supply Chain delivery program, e.g. progress to target by Business Segment, engagement, supplier performance.</li> <li>Actively engage KBR colleagues and Suppliers in delivery of the Sustainable Supply Chain agenda, through monthly &amp; quarterly communication, newsletters and engagement programs.</li> </ul>	Sustainable Supply Chain Manager/ Team
<b>Implementation &amp; Action</b>	<ul style="list-style-type: none"> <li>Participate in the delivery of the Sustainable Supply Chain agenda.</li> <li>Feedback to the Business Segment VP on progress and developments.</li> <li>Embed Sustainable Supply Chain requirements in Contracts and tenders.</li> </ul>	Business Segment Sustainable Supply Chain Champions Procurement & Supply Chain staff
		Suppliers, contractor, etc



## APPENDIX C : KBR SUSTAINABLE SUPPLY KPI

Organisational Governance	Human Rights	Labor Practices	Environment	Fair Operating practices	Consumer issues	Community engagement & Development
<ul style="list-style-type: none"> <li>• 1 -Top leadership sponsorship.</li> <li>• 2 - Legal conformance.</li> <li>• 3 - Adoption of recognised management systems e.g. H&amp;S, Quality Environment,</li> <li>• 4 - Risk management approach.</li> <li>• 5- Supply chain support to improve sustainability performance.</li> <li>• 6 - Supplier / Vendor code of conduct</li> </ul>	<ul style="list-style-type: none"> <li>• 7 - Identify, prevent, analyse potential for negative impacts on human rights.</li> <li>• 8 -Take action to avoid complicity in respect for human rights issues.</li> <li>• 9 - Process for resolving grievance.</li> <li>• 10 - Process to avoid unlawful discrimination of vulnerable groups.</li> <li>• 11 -Establish rights of supply chain, migrant workers and communication in their native language.</li> <li>• 12 -Take action to improve performance / assist supply chain to improve performance (including requirements outlined in the Dhaka Principles/ ILO ).</li> </ul>	<ul style="list-style-type: none"> <li>• 13 - Ensure suppliers and contractors, labour issues are addressed</li> <li>• 14 - Ensure decent work conditions, fair wages, limits to working time</li> <li>• 15 - Provide regular employment,</li> <li>• 16 - Ensure health, wellbeing, safety and occupational health are maintained.</li> <li>• 17 - Address issues of human trafficking, modern slavery and forced and/or child labor</li> <li>• 18 - Ensure adequate provision of skills training.</li> </ul>	<ul style="list-style-type: none"> <li>• 19 - Prevention of pollution.</li> <li>• 20 - Climate risk and opportunities identified and action plans in place for a Cleaner Planet.</li> <li>• 21 - Sustainable resource use; e.g. Waste management, minimisation/ water use</li> <li>• 22 - Sustainable Travel / transportation for employees commuting and business travel.</li> <li>• 23 - Protection of biodiversity/restoration of natural habitats and or built environments.</li> <li>• 24 - Recognise / Adopt UN Sustainable Development Goals.</li> </ul>	<ul style="list-style-type: none"> <li>• 25 - Address minimum living wage and working hours</li> <li>• 26 - Prevent and fight corruption (anti-bribery and corruption training / policy)</li> <li>• 27 - Prohibit manipulation, intimidation, coercive, harassment and abusive behaviour.</li> <li>• 28 - Promote responsible conduct and embed anti-competitive behaviour.</li> <li>• 29 - Avoid unlawful discrimination across all aspects of employment.</li> <li>• 30 - Address Freedom of association and collective bargaining.</li> </ul>	<ul style="list-style-type: none"> <li>• 31 - Embed fair marketing, fair contractual practices.</li> <li>• 32 - Ensure suppliers goods or services will protect consumers' health and safety.</li> <li>• 33 - Stimulate the design of products and packaging so that they can be easily used, reused, repaired, or recycled.</li> <li>• 34 - Have clearly defined complain mechanisms.</li> <li>• 35 - Provide consumer data protection, data privacy, and cyber security to safeguard clients and customers</li> <li>• 36 - Contribute to the education of consumers.</li> </ul>	<ul style="list-style-type: none"> <li>• 37 - Contribute to community involvement, in respect of cultural, social and political rights.</li> <li>• 38 - Promote, support and education of communities.</li> <li>• 39 - Employment creation within local communities e.g. indigenous people, Ethnic-minority owned, women-owned, LGBT-owned, Disadvantaged, HUBZone, Veteran-owned, Service-disabled veteran-owned business, small to medium sized enterprise, without unfair advantage to any type, classification or size of supplier.</li> <li>• 40 - Promote or provide access to technology.</li> <li>• 41 - Improve local and social investment (access to basic requirements – food, essential goods).</li> <li>• 42 - Seek to eliminate the negative health impacts.</li> </ul>

## APPENDIX D : KBR SUSTAINABLE SUPPLY CHAIN LOGO

At KBR, every action we take as a company is **aligned with our vision and values**, which provide the framework for who we are and how we operate.

**We believe** doing what's right for the planet, the communities where we live and work, and our people is good for our business.

**We deliver** innovative, high-quality, technology-led solutions for our clients, and exceptional sustainable value for all our stakeholders, which requires sustainable supply chain management.

In alignment with our Procurement and Supply Chain Management Policy, and Business Code of Conduct, **we hold ourselves and our suppliers to high standards** to protect the integrity of our supply chain and ethically deliver business resilience, growth and shared value for the benefit of all stakeholders, underpinned by positive environmental and social impact.

This policy sets out the foundation of our approach and compels every individual involved in purchasing to use high standards of business and personal integrity to ensure KBR's purchasing and contracting activities are sustainable. Through the adoption of the *ISO20400*; 2017 Sustainable Procurement **7 core subjects and 12 principles** in the Sustainable Supply Chain Charter KBR embeds the best practice approach and intent to build integrity across our Supply Chain Management approach.

The following Sustainable Supply Chain logo symbolizes how **KBR Procurement recognizes its commitment to all aspects of the broad sustainability, environmental, social and governance agenda**.

