

## **Global Human Rights Policy**

**Date:** April 30, 2025

**Reference No:** P-GL-KBR-HR-3380

---

### **PURPOSE:**

The purpose of this Policy is to ensure that all of KBR's operations worldwide respect and uphold the Human Rights of all our stakeholders and, in particular, our employees and subcontractor employees.

### **SCOPE:**

This policy applies to all operations of KBR and affiliates worldwide and all third parties who conduct business on KBR's behalf. The Company also expects all of its subcontractors, vendors, independent contractors, suppliers, and business partners, and their lower-tiered subcontractors and suppliers to uphold these principles and urges them to adopt similar policies within their own businesses.

### **POLICY:**

KBR adheres to the highest legal and ethical conduct as outlined in the KBR Code of Business Conduct in all aspects of business including equal opportunities, anti-discrimination and harassment, workplace safety, privacy, anti-corruption, human rights, and corporate sustainability. This is embodied in two of our core values: "We Value Our People" and "We Are People of Integrity." KBR respects fundamental human rights and views them as a key component of responsible corporate citizenship.

We believe that although governments have the primary role of protecting the human rights of their citizens, we have a responsibility to uphold and respect human rights in the countries in which we do business. We strive to respect and promote human rights as set forth in the United Nations Guiding Principles on Business and Human Rights and are guided by international human rights principles encompassed by the Universal Declaration of Human Rights, including those contained within the International Bill of Rights and the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work.

This Policy sets forth KBR's commitment to ensure its operations and supply chain are free from modern slavery, human trafficking and forced labor, and its commitment that the Company, its subsidiaries, its employees, its suppliers, and its partners will comply with all applicable laws including, but not limited to, the U.S. Federal Government's Federal Acquisition Regulation on Ending Trafficking in Persons, the UK Modern Slavery Act 2015, Australia's Modern Slavery Act 2018, as well as local laws in the countries in which we operate.

Furthermore, all of our stakeholders – not just our employees but also our subcontractors, vendors, independent contractors, suppliers, business partners, customers and members of the communities in which we operate – have an important role to play in ensuring that this Policy, together with the Code of Business Conduct, is consistently applied and enforced. To that end, as discussed below under "Guidance for Reporting for Employees and Others," we provide information and reporting procedures if there is reason to believe that any KBR employee, subcontractor, vendor, independent contractor, supplier, business partner, or any of their respective representatives, may have violated this Policy or any applicable law, rule or regulation, or otherwise engaged in unethical behavior. We are committed to continually evaluating the effectiveness of this Policy and evaluating and improving our policies,

procedures, and training, in each case with the help of and input from all of our stakeholders, to ensure that the goals of this Policy and the Code of Business Conduct are achieved.

- **Total Inclusion**

As provided for in our Code of Business Conduct, we are committed to equal opportunity and are intolerant of discrimination and harassment. We work to maintain workplaces that are free from discrimination or harassment on the basis of race, color, age, sex, religion, national origin, disability, veteran's status, genetic information, sexual orientation, gender identity or expression or any other status protected by applicable law or regulation.

Qualifications, performance, skills and experience are the basis for recruitment, hiring, placement, development, training, compensation and advancement at the Company. We do not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind. Harassment is not tolerated in the workplace and in any work-related circumstance outside the workplace. We value and advance the inclusion of the people with whom we work.

- **Freedom of Association and Collective Bargaining**

We respect our employees' right to join, form or not to join a labor union, under applicable laws and regulations, without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. The Company is committed to bargaining in good faith with such representatives.

- **Health, Safety, and Security**

As provided for in our Code of Business Conduct, the safety and health of our employees and workplaces are of paramount importance. Our policy is to provide a safe and healthy workplace and comply with applicable safety and health laws and regulations, relevant industry standards of practice, as well as internal requirements. We work to provide and maintain a safe, healthy and productive workplace, in consultation with our employees, by addressing and remediating identified risks of accidents, injury and health impacts.

- **Work Hours, Wages and Benefits**

We strive to compensate employees competitively relative to the industry and local labor market. We work to ensure full compliance with applicable wage, work hours, overtime and benefits laws.

- **Modern Slavery and Trafficking in Persons**

We prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, modern forms of slavery and any form of human trafficking.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor, and human trafficking, all of which have in common the deprivation of a person's liberty by another for personal or commercial gain.

KBR has a zero-tolerance approach to modern slavery and human trafficking, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery or human trafficking is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under any and all applicable modern slavery acts and regulations. We expect the same high standards from all of our subcontractors, vendors, independent contractors, suppliers, and business partners. As part of our contracting processes, we require commitments against the use of forced, compulsory or trafficked labor, or anyone held in slavery or servitude, whether adults or children, and we expect that our subcontractors, vendors, independent contractors, suppliers, and business partners will hold their own suppliers to the same high standards.

Modern slavery, trafficking in persons, and forced labor are contrary to traditional values of dignity and respect and are illegal in most countries where KBR conducts its business. If an employee or representative of KBR engages in said illegal behavior, such actions are contrary to KBR's Code of Business Conduct. KBR has adopted a zero-tolerance policy regarding KBR employees, subcontractors, vendors, independent contractors, suppliers, and business partners, and their employees who engage in or support modern slavery, trafficking in persons, or the use of forced labor.

This Policy should be read in conjunction with our corporate policy on Trafficking in Persons, [P-GL-KBR-LL-1011](#), in relation to our work for the United States Government.

- **Child Labor**

We abide by local minimum age laws and do not use or condone child labor in any circumstance.

- **Migrant Workers**

Migrant workers are particularly vulnerable to exploitation, forced labor, and human rights abuses. These workers are typically seeking better work opportunities and livelihoods for their families by working in a country other than their home country for extended periods of time, putting them in a position more vulnerable to mistreatment than others.

KBR's workforce is sourced through various types of contracting channels, which often define members of the workforce by different terms to include expatriates, subcontract employees, independent contractors, local nationals, and third or other country nationals. KBR is committed to prohibiting human rights violations within its extended workforce and in its supply chain, while also recognizing that external employers and agencies are directly responsible for their workforce providing services to KBR.

As stated above, this Policy and its protections apply to KBR's entire workforce. Due to the vulnerable status of Migrant Workers and as more fully described in KBR's forthcoming Migrant Workers Procedures, KBR is committed to the fair treatment and protection of Migrant Workers in accordance with the **Dhaka Principles for Migration with Dignity**, including the following core principles: (A) All workers are treated equally and without discrimination; and (B) All workers enjoy the protection of applicable employment law. KBR expects its subcontractors, vendors, independent contractors, suppliers, and business partners to enact and enforce similar Migrant Worker policies and protections.

- **Guidance and Reporting for Employees and Others**

**Employees, workers, subcontractors, vendors, independent contractors, suppliers, and business partners and others are encouraged to report any suspected violations of this Policy by contacting KBR's ethics hotline or using another available method described below.**

It is the duty and responsibility of every employee to be aware of and abide by KBR policies and procedures. Individuals found to have engaged in inappropriate behaviors are subject to disciplinary action up to and including termination of employment. Employees who become aware of behaviors prohibited by KBR's policies and procedures are required to report them. Supervisors and other members of management who fail to report violations by others of which they become aware also will be subject to disciplinary action, up to and including suspension and termination of employment. Retaliation against a person who initiates a complaint or an inquiry about inappropriate behaviors is strictly prohibited.

To help employees comply with KBR's policies and procedures, KBR has engaged an independent company that specializes in the confidential and anonymous reporting of workplace and ethical issues and concerns. The independent company forwards all complaints and allegations it receives to KBR on a confidential basis. KBR will review every submission received, investigate all complaints, and, where appropriate, implement corrective action. This independent and confidential reporting system is open to accept submissions from anyone, including external parties.

Reports may be submitted in four ways: 1) online; 2) over the phone; 3) via email; or 4) through the Director of Business Conduct post office box.

- To submit a report online, go to <https://Ethics.KBR.com/> (available in 59 languages/dialects), start by selecting "File a Report," and then follow the simple instructions. This website is hosted by a third-party vendor on secure servers and is not part of KBR's website or intranet.
- To submit a report by telephone from either within the United States or Canada or internationally, follow the simple instructions at <https://Ethics.KBR.com/> regarding accessing a hotline. Each country has a toll-free number, with translators available 24 hours a day.
- To submit a report via email, send a message to [fhokbrcode@kbr.com](mailto:fhokbrcode@kbr.com).
- To submit a report in writing, address your concern to:  
Director of Business Conduct  
KBR, Inc.  
P.O. Box 2464  
Houston, TX 77252-2464  
U.S.A.

- **Implementation of Policy**

KBR will support and implement this Global Human Rights Policy by:

- Complying with all applicable laws and regulations where KBR does business and adopting and applying KBR's standards as set forth in this Policy where laws are less stringent;
- Conducting due diligence on suppliers and other third parties, as a means to identify and prevent human rights risks to people in our business and value chain. Where we have identified adverse human rights impacts resulting from or caused by our business activities, we are committed to provide for or cooperate in, their fair and equitable remediation. We seek to promote access to remediation where we are linked to or involved in those adverse impacts through our relationships with third parties;
- Promulgating procedures as necessary to implement various aspects of this Policy;

- Regularly assessing Human Rights risks, policies, and impacts and providing visibility of the results to the Board of Directors (or applicable Committee of the Board) and senior management;
- Providing access to independent grievance mechanisms to raise concerns or identify adverse Human Rights impacts;
- Promptly investigating allegations and pursuing action to mitigate any adverse Human Rights impacts;
- Promoting continual improvement; and
- Providing training on Human Rights that is included as part of KBR's Code of Business Conduct training.

## **ROLES AND RESPONSIBILITIES:**

The Human Rights Policy is overseen by KBR's Board of Directors (or applicable Committee of the Board), including the Chief Executive Officer.

## **DEFINITIONS:**

**Migrant Worker** means a person who migrates from one country to another with a view to being employed otherwise than on his or her own account and who is resident in the country in which they are employed.

## **REFERENCES:**

Code of Federal Regulations, [48 CFR 52.222-50 Combating Trafficking in Persons](#)  
[KBR's Code of Business Conduct](#)  
[Trafficking in Persons, \(P-GL-KBR-LL-1011\)](#)  
[Supplier Code of Conduct](#)

---

**APPROVED BY:** CEO

**DATE:** April 30, 2025

**SUPERSEDES:** Policy dated February 27, 2025.