

UK MODERN SLAVERY ACT STATEMENT (filed by Kellogg Brown & Root Limited)

OUR BUSINESS AND OPERATIONS

KBR Inc. (“KBR”) provides comprehensive solutions for a wide range of industries and companies all over the world. Our diverse projects and programs include large scale energy and chemicals sites and facilities, delivering mission critical services for aerospace and defense, and meeting the physical and digital infrastructure needs of governments and organizations across the globe.

KBR employs approximately 37,000 people worldwide (including our joint ventures), with customers in more than 80 countries and operations in 40 countries, across three synergistic global businesses segments.

The **Government Solutions** segment is focused on long-term contracts with the United States, United Kingdom and Australian governments and provides goods and services to military installations located around the world.

The **Technology Solutions** segment combines KBR's proprietary technologies, equipment, catalyst and associated knowledge-based services into a global business for refining, petrochemicals, inorganic and specialty chemicals as well as gasification, syngas, ammonia, nitric acid and fertilizers.

The **Energy Solutions** segment provides feasibility and solutions development, technical consulting, engineering and design services, program management and energy transition solutions for industrial clients globally.

Table 1.1 is a depiction of where KBR conducted business operations in 2019.



KBR is listed on the NYSE and is headquartered in Houston, Texas. KBR operates several wholly owned subsidiaries including Kellogg Brown & Root Limited ("KBRL"), which is based in Leatherhead, UK.

OUR SUPPLY CHAIN

KBR has over 97,000 vendors/suppliers in over 170 countries.

KBR, through its subsidiaries and Joint Ventures, provides direct and indirect engagement to its customers of labor, goods, and services. KBR's indirect engagement consists of KBR subcontractors providing the labor, 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. 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, low-skilled employees working for KBR subcontractors in host countries is an area of concern for KBR and is addressed through its Trafficking in Persons (TIPS) and Modern Slavery Act (MSA) program.

OUR ACTIONS

- KBR acknowledges its corporate responsibility to respect human rights as delineated in the United Nations Guiding Principles on Business and Human Rights. KBR has adopted Human Rights as a Corporate Pillar in its sustainability platform. KBR further recognizes 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 Code of Business Conduct ("COBC") recognizes promoting human rights as its corporate responsibility and expects all of its employees to adhere to the COBC. All employees are required to complete annual Ethics training, which also includes training regarding human trafficking. Additionally, a large portion of the workforce is also required to complete separate TIPS training as mandated by the U.S. Government for defense contractors.
- KBR has established an Ethics Hotline, where employees and others can report COBC violations or human rights violations. KBR engages a third-party vendor to manage the Ethics Hotline, which provides additional assurances that reporters can maintain their anonymity when reporting suspected COBC violations.
- KBR's Legal Department (COBC) promptly and thoroughly investigates any report

that may include indications of human rights abuses and contacts the appropriate authorities when appropriate. KBR has notified the U.S. Department of Defense-Inspector General concerning a fraud scheme where labor broker(s) recruited unwitting job applicants for fictitious defense contractor jobs with no involvement of KBR.

- KBR's Supplier Code of Conduct affirms that KBR has zero tolerance for child or forced labor and trafficking in persons and requires suppliers to adhere to these principles.
- KBR conducts TIPS/MSA audits/inspections of 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 doing business with entities that are not flagged for designated human rights abuses or other watch-lists/sanctions.
- KBR conducts additional due diligence on certain business partners that include reviewing any derogatory information concerning human rights abuses.

OUR COMMITMENT (2020-2021)

KBR is undertaking further steps to improve our oversight of our supply chains and subcontractors in order to avoid workers being abused or exploited and reassess risks. KBR is:

- Implementing a strategic plan for conducting subcontractor TIPS/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 TIPS/MSA violations have occurred.
- continually reviewing and, where necessary, updating our processes and policies governing modern slavery and people trafficking;
- continually reviewing and, where necessary, updating our processes for appointing potential supply chain providers;
- conducting further internal reviews to ensure that our systems contain appropriate processes to protect lesser skilled workers engaged in overseas locations;
- providing ongoing training to all employees and certain key suppliers about modern slavery and trafficking in people, and referring them to our ethics hotline to report any concerns;
- identify other key suppliers and subcontractors for audits to be undertaken; and
- intending to develop key performance indicators to measure our progress in tackling

modern slavery internally and throughout our supply chain. KBR aims to put these in to place during 2021 with key suppliers.

The restrictions on travel and movement put in place by governments across the globe due to the coronavirus (COVID-19) pandemic have impacted business operations internationally. KBR took the threat of coronavirus seriously early on, and in January 2020 KBR convened our global crisis management team to assess various scenarios and KBR's business resilience. Our primary focus continues to be the health, safety and wellbeing of our people. As a result of this focus, KBR has been able to provide continuity of service to our clients, and demand from our government clients has remained consistent with levels seen prior to the pandemic. The pandemic has hindered some of our actions set out in KBRL's previous modern slavery statement, for example, conducting in-person audits of global suppliers. KBR, like many other businesses, has successfully transitioned to widespread use of online video and audio collaboration platforms, which can be used as a temporary replacement for face to face contact with clients and our supply chain. KBR will continue to be vigilant to the risk of, and the consequences caused by, modern slavery and people trafficking.

This statement constitutes KBR's Modern Slavery Act Statement for the year to the end of July 2020, having been agreed by the Board of Directors of KBRL on 12 August 2020 and is made in accordance with Section 54(1) of the UK Modern Slavery Act 2015.

Signed: 

Dated: 12/8/20

Name: ANDREW BARRIE

Director

Kellogg Brown & Root Limited