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Corporate Policy

Process Owner: EVP, General Counsel

Content Owner: EVP, General Counsel

Global Human Rights Policy

Date: June 29, 2015

Reference No: P-GL-KBR-LL-1010

PURPOSE:

The purpose of this Policy is to ensure that all of KBR's operations worldwide respect and uphold the Human Rights (as defined below) of all human beings.

SCOPE:

This policy applies to all operations of KBR and affiliates worldwide.

POLICY:

KBR acknowledges the principles contained in the United Nations Universal Declaration of Human Rights as a general standard of human rights worldwide; however, KBR believes it is the role of government in each country to protect the human rights of its citizens. However, KBR plays a role in upholding the following Human Rights by our own actions in the countries in which we do business:

- **Equality** – It is the policy (KBR's Code of Business Conduct, KBR Code of Business Conduct and Equal Employment Opportunity & Harassment sections) of KBR not to discriminate against employees, shareholders, directors, customers, or suppliers on account of race, color, age, sex, religion, national origin, disability, veteran's status, genetic information, sexual orientation, or gender identity or expression. All of such persons shall be treated with dignity and respect, and they shall not be unreasonably interfered with in the conduct of their duties and responsibilities.
- **Dignity and Respect**
 - Workplace Conduct – KBR strives to maintain a work environment that encourages mutual respect and professionalism and is free from all forms of intimidation, harassment (see below for more detail), and violence. KBR does not tolerate any form of such behavior directed toward KBR employees or persons connected with KBR, including, but not limited to, external clients, customers, and vendors. In addition, KBR prohibits all forms of Nepotism among its own employees. With respect to Nepotism, applicable federal law of the country in which we are working will define what constitutes Nepotism, but if there is no applicable federal law defining Nepotism, U.S. federal law will apply. Corporate Policy No. P-GL-KBR-HR-3360 provides more details on KBR's requirements regarding workplace conduct. Corporate Policy No. P-GL-KBR-HSSE-2102 provides more details on preventing workplace violence.

- Harassment – KBR prohibits all forms of harassment of its employees by directors and other employees, including supervisors or other members of management. Harassment is considered a serious act of misconduct and may subject an employee to disciplinary action including immediate discharge. The term "harassment" is defined in KBR's Harassment Policy (KBR's Code of Business Conduct, Equal Employment Opportunity & Harassment section).
- Trafficking in Persons – Trafficking in persons, forced labor, and commercial sex are contrary to traditional values of dignity and respect and are illegal in many 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 and other Corporate Policies (KBR's Code of Business Conduct and P-GL-KBR-HR-3360). KBR has adopted a zero-tolerance policy regarding KBR employees, KBR subcontractors, and subcontractors' employees who engage in or support Trafficking in Persons, procurement of Commercial Sex Acts, or use of forced labor. Failure to comply with KBR's Trafficking in Persons Policy (Corporate Policy No. P-GL-KBR-LL-1011) will result in disciplinary action up to or including removal from the host country assignment location or termination of employment.

KBR's government-approved procurement system consists of policies, training, practices, and oversight of subcontractors' responsibility, including numerous robust mechanisms to combat Trafficking in Persons. At the subcontract level, we include flow-down clauses outlining subcontractor responsibilities and requirements with regard to Trafficking in Persons compliance. KBR proactively enforces these requirements by, for example, conducting pre-award reviews, ensuring that all KBR and subcontractor employees attend an approved Trafficking in Persons training program, conducting monthly inspections at subcontractor temporary labor camps, and advertising the availability of an Ethics Hotline for reporting any ethics concerns, including potential Trafficking in Persons violations.

- **Health, Safety and Environment** – KBR will comply with all applicable laws and relevant industry standards of practice concerning protection of health and safety of its employees in the work place and other persons affected by its business activities and the prevention of environmental pollution, including, but not limited to, water, waste, and chemical pollution. KBR's Code of Business Conduct (Health, Safety, Security & Environment section) provides more detail on health, safety, and environment.

KBR complies with applicable local and international legal requirements in the countries in which it does business. Where local and/or international law conflicts with the principles contained in this Global Human Rights Policy, KBR will endeavor to resolve such conflict following the guidance of its Law Department. Where such a conflict cannot be resolved, the applicable Laws of the United States will be observed and complied with by KBR.

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. 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 prohibited.

To help employees comply with KBR's policies and procedures, KBR 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.

You may submit a report four ways: 1) online; 2) over the phone; 3) via email; or 4) through the Director of Business Conduct P.O. Box.

- To submit a report online, go to www.kbr.ethicspoint.com (which is available in 11 languages), start by selecting "File a Report," and then follow the simple instructions. This website is hosted by EthicsPoint's 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 www.kbr.ethicspoint.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, address your concerns to fhokbrcode@kbr.com.
- Or write to:

Director of Business Conduct
KBR, Inc.
P.O. Box 2464
Houston, TX 77252-2464
U.S.A.

All reports received through the website, hotline, email, and mail above are directed to KBR's Director of Business Conduct.

KBR's Director of Business Conduct, through KBR's General Counsel, will report to KBR's Board of Directors (or applicable Committee of the Board) the results of the Director's efforts to monitor and audit compliance with KBR's Global Human Rights Policy to the extent requested by the Board or applicable Committee.

ROLES AND RESPONSIBILITIES:

KBR will support and practice its Global Human Rights Policy by:

- Complying with 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;
- Completing due diligence as requested by KBR's Board of Directors (or applicable Committee of the Board) to avoid complicity in Human Rights violations;
- Regularly assessing Human Rights risks, policies, and impacts and providing visibility of the results to senior executives;
- 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 that is included as part of KBR's Code of Business Conduct training, at such times as requested by KBR's Board of Directors (or applicable Committee of the Board).

DEFINITIONS:

Coercion means (i) threats or serious harm to or physical restraint against any person, (ii) any scheme, plan, or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person, or (iii) the abuse or threatened abuse of the legal process.

Commercial Sex Act means any sex act where anything of value is given to or received by any person.

Debt Bondage means the status or condition of a debtor arising from a pledge by the debtor of his or her personal services or of those of a person under his or her control as a security for debt, if the value of those services as reasonably assessed is not applied toward the liquidation of the debt or the length and nature of those services are not respectively limited and defined.

Forms of Trafficking means (i) sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age, or (ii) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or Coercion for the purpose of subjection to Involuntary Servitude, peonage, or Debt Bondage.

Involuntary Servitude means a condition of servitude induced by means of (i) any scheme, plan, or pattern intended to cause a person to believe that, if the person did not enter into or continue in such conditions, that person or another person would suffer serious harm or physical restraint, or (ii) the abuse or threatened abuse of the legal process.

Nepotism under U.S. federal law means, with respect to any KBR employee, the act of appointing, employing, promoting, advancing, or advocating for appointment, employment, promotion, or advancement, in or to a position in KBR in which the employee is serving or over which the employee exercises jurisdiction or control any individual who is a Relative of the employee. A KBR employee may not be appointed, employed, promoted, or advanced in or to a position in KBR if such appointment, employment, promotion, or advancement has been advocated by an employee, serving in or exercising jurisdiction or control over the position, who is a Relative of the individual.

Relative under U.S. federal law means an employee's father, mother, son, daughter, brother, sister, uncle, aunt, first cousin, nephew, niece, husband, wife, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, stepfather, stepmother, stepson, stepdaughter, stepbrother, stepsister, half-brother, or half-sister.

REFERENCES:

Code of Federal Regulations, 48 CFR 52.222-50 Combating Trafficking in Persons

[KBR's Code of Business Conduct](#)

Corporate Policy No. P-GL-KBR-HSSE-2102 "Preventing Workplace Violence"

Corporate Policy No. P-GL-KBR-HR-3360 "Workplace Management"

Corporate Policy No. P-GL-KBR-LL-1011 "Trafficking in Persons"

APPROVED BY: CEO

DATE: June 29, 2015

SUPERSEDES: P-GL-KBR-HR-3811 Global Human Rights Policy