

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

OUR BUSINESS AND OPERATIONS

KBR, Inc. (“KBR”) delivers science, technology and engineering solutions to governments and companies around the world. KBR employs approximately 28,000 people performing diverse, complex and mission critical roles in 34 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.

The company’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; and
- Information operations such as data analytics; mission planning systems; and 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.

Table 1.1 is a depiction of where KBR conducted business operations as at December 2021.



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 5,000 vendors/suppliers globally.

KBR, through its subsidiaries and joint ventures, 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. 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) programme.

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 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 Code of Business Conduct (**COBC**) recognises promoting human rights as its corporate responsibility and expects and requires 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 significant portion of the workforce is also required to complete separate CTIPS training as mandated by the U.S. Government for defence 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 (through its COBC team) promptly and thoroughly investigates any report that may include indications of human rights abuses and contacts the appropriate authorities when appropriate. -
- KBR's Supplier Code of Conduct (**SCOC**) affirms that KBR has zero tolerance for child or forced labour and trafficking in persons and requires suppliers to adhere to these principles.
- KBR conducts CTIPS/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 not doing business with any entities that are flagged for designated human rights abuses; or subject to other watch-lists/sanctions.
- KBR devised and established a new online training programme that was launched to 53 'Tier 1' suppliers to raise awareness in identifying and combatting modern slavery in the supply chain. The training achieved a success rate of 71% of the initial targeted suppliers completing the training.

KBR identified 34 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) and conducted a pilot desktop audit.

OUR COMMITMENT (2022-2023)

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 to monitor and (where necessary) reassess risks. KBR:

- is implementing a strategic plan for conducting physical subcontractor 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.
- will continue to implement the rollout of its online modern slavery training programme;
- is continually reviewing and, where necessary, updating our processes and policies governing modern slavery and people trafficking;
- 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 and updating ongoing training materials to be given 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;

- plans to conduct in-person audits of key suppliers, as COVID-19 restrictions continue to be removed (but please see below);
- is identifying further suppliers and subcontractors that should be audited; and
- will continue to implement its key performance indicators to measure our progress in tackling modern slavery internally and throughout our supply chain.

As the coronavirus (COVID-19) pandemic enters its third year, KBR's primary focus continues to be the health, safety and wellbeing of our people. As set out in last year's statement, the pandemic continued to hinder some of the proposed actions set out above, for example, conducting in-person audits of global suppliers. Over the past 2 years, KBR has successfully transformed into a fully functioning hybrid-working operation.

As the world begins to emerge from COVID-19 restrictions and return to pre-pandemic activities, KBR hopes to be able to resume physical inspections and interactions, although these will be subject to country-specific visa and other restrictions. Such restrictions permitting, our hope and expectation is that we will continue to deliver on our Modern Slavery KPIs.

Other external influences, like the war in Ukraine, resulting in mass-movement of vulnerable people, poses an enhanced risk of people trafficking and modern slavery on our doorstep. KBR is fully aware of this and will continue to remain vigilant to such risks.

This statement constitutes KBRL's U.K. Modern Slavery Act Statement for the year to the end of December 2021, having been agreed by the Board of Directors of KBRL on 17 June 2022. It is made in accordance with Section 54(1) of the UK Modern Slavery Act 2015 and is submitted on behalf of the entities listed in the Schedule to this statement.

Signed: 

Dated: 17 June 2022

Name: ANDREW BARRIE

Director

Kellogg Brown & Root Limited

Schedule

Entities Covered by this Statement

1. Kellogg Brown & Root Limited
2. Aspire Defence Services Limited
3. KBR (Aspire Construction Ventures) Limited
4. KBR (Aspire Construction) Limited
5. KBR (Aspire Services) Limited
6. KBR (Aspire Services Ventures) Limited
7. Kellogg Brown & Root (U.K.) Limited
8. Kellogg Brown & Root Holdings Limited
9. Kellogg Brown & Root Projects Limited
10. Overseas Supply Services Limited
11. Technical Staffing Resources Limited