SUPPLIER CODE OF CONDUCT



PREAMBLE

KBR has a Code of Business Conduct that contains specific corporate policies. KBR's Code of Business Conduct can be found on KBR's website at https://www.kbr.com/code-business-conduct. The KBR Code of Business Conduct establishes a common set of ethical standards and legal principles that are binding for all Directors and Employees of KBR and its Subsidiaries worldwide. KBR expects all Suppliers and Subcontractors acting with them also to ascribe to the same ethical standards. KBR will not condone any illegal or unethical actions on the part of its employees, Directors or any Supplier or Sub Supplier with whom KBR performs business.

The purpose of this Supplier Code of Conduct is to define KBR's expectations of Supplier in relation to its work with KBR, including compliance with any local and national laws and regulations.

DEFINITIONS

KBR: means KBR Inc., a Delaware corporation, its subsidiaries, affiliates, Business Units, Business Groups and successors.

Supplier: means any supplier, vendor, subcontractor, lower tier subcontractor, consultant, subsidiary, affiliate, agent, or other third party (including their employees) that provides goods or services to or on behalf of KBR.

COMPLIANCE WITH LAWS

KBR expects its Suppliers to observe the highest standards of personal and business ethics and to comply with all applicable laws and regulations. As a public company subject to U.S. laws, KBR must ensure that its Suppliers inside and outside the U.S. comply with the requirements of certain U.S. laws that impose on KBR standards of conduct for its business throughout the world. If a Supplier identifies an actual or potential conflict between applicable legal requirements or between this Code and applicable law, the Supplier must promptly notify its KBR contact and seek appropriate guidance before proceeding.

HEALTH, SAFETY AND ENVIRONMENT (HSE)

Supplier shall comply with all applicable laws and relevant industry standards and practices concerning protection of health and safety of its employees in the workplace and other persons affected by its business activities and the prevention of environmental pollution. KBR expects Supplier to have a HSE policy and system in place to manage, track and report occupational injury and illness, that all employees will be trained on a regular basis, and have management commitment to HSE as a core value.

ANTI-CORRUPTION

Suppliers must comply with the U.S. Foreign Corrupt Practices Act, and other applicable anti-corruption laws. Suppliers must never offer, give, request, or accept bribes, kickbacks, facilitation payments, or anything else intended to improperly influence a decision or gain a business advantage. This includes cash, gifts, meals, entertainment, travel, donations, sponsorships, or job opportunities.

Suppliers must not offer gifts, meals, entertainment, or travel that could influence, or appear to influence, a KBR employee. Modest business courtesies are permitted only when reasonable, lawful, and appropriate. Cash, gift cards, and other cash equivalents are prohibited.

Suppliers must not use an agent, subcontractor, intermediary, or other third party to engage in conduct that the Supplier is prohibited from undertaking directly.

BOOKS AND RECORDS

Supplier shall maintain accurate books and records and record all payments, in cash or in kind, on behalf of KBR.

IMPORT AND EXPORT CONTROL

Supplier shall comply with the import and export, re-export and sanctions laws and regulations of the United States of America, and of any other applicable jurisdiction or country (to the extent not in conflict with the laws of the United States of America). Supplier shall not acquire any goods or services if any law, regulation, or other government action of the United States or any other applicable country would prohibit such a transaction. This includes, but is not limited to, a prohibition on the supply of goods or services that originate in a country that is subject to U.S. economic embargo, or that are that are supplied by a person that is a listed or blocked person or entity under any U.S., UN, EU, or other applicable embargo or sanctions program.

ANTITRUST AND COMPETITION

In addition, Supplier shall commit to conducting business in a fair manner and will comply with applicable antitrust and competition laws.

POLITICAL CONTRIBUTIONS

Supplier shall follow applicable laws regarding political contributions.

DISCLOSURE

Supplier shall comply with the laws of the U.S. and the regulations of the U.S. Securities and Exchange Commission and the New York Stock Exchange regarding the use and public disclosure of material nonpublic information, including those regarding insider trading. Supplier shall also refrain from disclosing KBR's confidential or proprietary information at any time to persons outside the Contracting Relationship without proper authorization.

DATA PROTECTION, PRIVACY & CYBERSECURITY

KBR expects all suppliers to adequately protect personal, commercial and technical data provided to them. Suppliers will ensure the confidentiality, integrity, and availability of that data through appropriate cybersecurity controls (for digital data) and organizational controls (for all types of data).

Suppliers will cooperate in ensuring their accountability, including through the maintenance of supplier details in the KBRSupplier portal.

Suppliers will establish policies, processes and procedures to ensure data protection and privacy and cybersecurity. Suppliers will refrain from disclosing KBR's confidential or proprietary information at any time to persons outside the contracting relationship without proper authorization. Suppliers will take appropriate action in the management of employees and subcontractors' non-conformity with data protection and cybersecurity.

DISCRIMINATION AND HARASSMENT

KBR expects all individuals to be treated with dignity and respect. Supplier shall not engage in any kind of discrimination or harassment. Harassment includes sexual, racial, ethnic, and other forms of harassment, including harassment based upon disability. All people should be treated equally and Supplier shall not discriminate on the grounds of race, color, sex, religion, ancestry, ethnic heritage, age, mental or physical disability or appearance or any other status protected by the laws or regulations in the locations of operation. Suppliers shall treat their employees with respect and not use physical violence, harassment, threat of violence or any other form of physical coercion.

CHILD LABOR / TRAFFICKING IN PERSONS

KBR has a zero-tolerance policy towards child labor, forced labor and trafficking in persons. Suppliers must not use threats, force, coercion, abduction, deceptive recruiting, recruitment fees, withheld wages, retained identity document or other forms of coercion. Work must be freely chosen, and Suppliers must ensure their labor providers follow these standards.

WORKING TIME / REMUNERATION / FREEDOM OF ASSOCIATION

KBR expects the Supplier to fully comply with the national rules, regulations or statutes concerning the working time including overtime and minimum wage legislation. To the full extent of applicable national laws and standards, the Supplier should respect the freedom of association, collective bargaining and the right of the employees to form a working council.

COMPLIANCE WITH THE KBR SUPPLIER CODE OF CONDUCT

Supplier agrees that KBR may review documentation demonstrating Supplier's compliance with the Supplier Code of Conduct and shall make such records and documentation available to KBR upon request and at no cost to KBR. Any violation of the principles and requirements set out in this KBR Supplier Code of Conduct will be regarded as a serious violation and KBR reserves the right to request from the Supplier that all relevant information be disclosed to demonstrate compliance.