



INFRASTRUCTURE
 MINING & METALS
 NUCLEAR, SECURITY & ENVIRONMENTAL
 OIL, GAS & CHEMICALS

Helping your communities – protecting Bechtel

How to respond to requests for donations from your communities and local officials?

Our projects and offices may each be receiving requests for in-kind donations or financial contributions to help the local city, region, state or country fight the spread of Covid-19, equip the medical services or treat the sick.

What could go wrong?

Problem	Why is this a problem?
Recipient looks like a legitimate entity. It turns out to be a scam.	<ol style="list-style-type: none"> 1. Donation is lost. 2. Potential reputational damage.
Recipient is real but is connected to a client manager or public official (or their close relatives), such that the donation as proposed could personally benefit a client or public official.	<ol style="list-style-type: none"> 1. Bechtel has to prove to regulatory authorities that the donation was not given to obtain or retain business by giving someone a personal benefit. 2. Investigative and legal costs. 3. Reputational damage.
Recipient doesn't use donation for its intended purpose OR donation is misappropriated.	<ol style="list-style-type: none"> 1. Donation is lost. 2. Possible involvement in ensuing criminal investigations. 3. Reputational damage.

How to mitigate the risk of a bad donation?

This is a [basic checklist](#) to help avoid the above problems, by vetting the recipient, structuring the donation, and documenting the process.

Donation should be transparent.

- Are we responding to a widely made appeal? Is the request made in writing?
- Did the recipient entity exist prior to the Covid outbreak? Make donations to organizations, not to individuals.
- Is the recipient related to a client manager, decision maker, or public official with oversight or authority over our operations? Check in with your E&C Officer: this will likely have to be declined.
- Clearly spell out the intent of our favorable response. Example: “Bechtel has a tradition of putting its resources in service of our local communities when they are hit by catastrophes.”
- Document that intent. Accompany the proposed donation with a written letter to the beneficiary, describing what prompted the donation, what Bechtel is donating, and what Bechtel's intent is in making the donation, ccing higher authorities and/or client as appropriate.
- Document the act of donation. If there is a handover, document this with such correspondence, but also involve Communications and take pictures of the handover.

Donation should be purposeful.

- Calibrate the response to match the crisis. Favor solutions that benefit your project's close community, favor solutions that play to our own strengths and resources.
- Where possible, consider making in-kind donations and cut out middle-men in the distribution chain, limiting the risk of misappropriation.
- Coordinate with the Sustainability or Community Relations teams on the project to see what may already be done, or planned, as part of our normal course of business that could address the specific request, or that could be amended to address that request.



Donation should be traceable.

- If making a financial donation, check the account: is it out of the country? What is the name on the account?
- Obtain a receipt, from the recipient (check letterhead, signatures, other indicia of legitimacy) acknowledging receipt and detailing what was received.
- Ask about accountability and governance: How are donations administered? Will there be a donors' report?
- After the fact, confirm that the donation was used for the stated purpose.

Contact your Ethics & Compliance Officer if you have any doubts or questions about local solicitations.

If you are in NS&E, refer to NS&E Instruction 242 for additional restrictions.