



Modern Slavery Act Statement

Financial Year
1 January 2022 – 31 December 2022

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The Reporting Companies

The Bechtel group of companies or Bechtel refers to Bechtel Group, Inc. and its direct and indirect subsidiaries collectively. Bechtel's principles, policies, management instructions, and functional procedures apply across the Bechtel group of companies and its organisations, including the following reporting commercial organisations and reporting entities.

UK Modern Slavery Act 2015 reporting “Commercial Organisation”¹

This statement is made on behalf of Bechtel Limited (BLTD), a member of the Bechtel group of companies, pursuant to the reporting requirements of Clause 54, Part 6 of the UK Modern Slavery Act 2015, and constitutes its Modern Slavery Act Statement for the financial year 1 January 2022 – 31 December 2022. BLTD is a private company limited by shares, registered in England & Wales (company number 506133) with its registered office at 2 Lakeside Drive, Park Royal, London NW10 7FQ, England. BLTD's board of directors approved this statement on 5 June 2023.

Australian Modern Slavery Act 2018 “Reporting Entities”²

This statement is also made on behalf of Bechtel Australia Proprietary Limited (BAPL) and Bechtel (Western Australia) Pty Ltd (BWAPL), both members of the Bechtel group of companies, pursuant to the reporting requirements of Part 2 of the Australia Modern Slavery Act 2018, and constitutes their Modern Slavery Act Statement for the financial year 1 January 2022 – 31 December 2022. BAPL is a proprietary company, registered in Australia (company number ACN 006 334 505) with its registered office at Level 3, 540 Wickham Street, Brisbane, QLD, 4006, Australia. BAPL's board of directors approved this statement on 26 April 2023. BWAPL is a proprietary company, registered in Australia (company number ACN 147 531 226) with its registered office at Level 12, 140 St. Georges Terrace, Perth, WA 6000, Australia. BWAPL's board of directors approved this statement on 26 April 2023.

This statement reports on the risks of modern slavery in Bechtel's operations and supply chains and the actions Bechtel has taken in the last financial year (1 January 2022 – 31 December 2022) to address and mitigate those risks.

Our Business

Bechtel is a trusted engineering, construction, and project management partner to industry and government. Differentiated by the quality of our people and our relentless drive to deliver the most successful outcomes, we align our capabilities to our customers' objectives to create a lasting positive impact. Since 1898, we have helped customers complete more than 25,000 projects in 160 countries on all seven continents that have created jobs, grown economies, improved the resilience of the world's infrastructure, increased access to energy, resources, and vital services, and made the world a safer, cleaner place.

We operate through four global business units (GBUs):

- **Infrastructure**, headquartered in London, with projects across the globe.
- **Nuclear, Security & Environmental**, headquartered in Reston, Va., with an office in Oak Ridge, Tn., and projects in the United States and allied nations.
- **Energy**, headquartered in Houston, with projects across the globe.
- **Mining & Metals**, with offices in Brisbane and Perth, Australia; Santiago, Chile; Riyadh, KSA; and Lima, Perú; with projects across the globe.

¹ Clause 54(1)-(3), Part 6 of the UK Modern Slavery Act 2015 defining a “commercial organisation” required to prepare a Modern Slavery Act statement.

² Section 5, Part 1 of the Australia Modern Slavery Act 2018 defining a “reporting entity” required to prepare a Modern Slavery Act statement.

In 2022, Bechtel also launched a **Manufacturing and Technology** business, headquartered in Reston, Va., with projects in the United States and Europe.

BLTD operated across the Energy, Mining & Metals, and Infrastructure GBUs during 2022. BAPL and BWAPL operated across the Energy and Mining & Metals GBUs during 2022.

Core to Bechtel are our [Vision, Values and Commitments](#). They are what we believe in, what our customers expect, and how we deliver. Consistent with our [Vision, Values & Commitments](#), we are dedicated to upholding and respecting human rights everywhere we operate, and treating people with the utmost respect. We expect our business partners, contractors, and suppliers to do the same.

Due Diligence, Risk Assessment, and Management

Bechtel has both permanent offices and temporary project offices or sites. The permanent offices support core business functions and provide centralized support services to our project offices and/or sites. The temporary project offices and sites provide the on-the-ground day-to-day work needed to manage, design, and build our customers' complex projects. Our project offices and sites are geographically dispersed and, in some cases, remote.

Much of the risk for modern slavery and human trafficking lies, not in our permanent offices, but in some of our temporary projects and the global supply chain serving them. For instance, our permanent offices are located primarily in countries with strong worker welfare and employment laws, and where modern slavery risk is lower according to the Global Slavery Index—e.g., Australia, Chile, the United Kingdom, and the United States. Even where a permanent office is located in a country where risk of modern slavery is moderate according to the Global Slavery Index—e.g., India—the office applies Bechtel's robust set of corporate and human resources policies and processes. Therefore, the overall risk of modern slavery at Bechtel's permanent offices is low.

On the other hand, our projects may have complex partnering arrangements that permit Bechtel different levels of authority, control, and influence; may employ foreign migrant workers; and rely on thousands of suppliers and subcontractors across the globe to deliver the equipment, materials, and services needed to engineer and build our customers' projects.

Factors affecting the risk of modern slavery in our project operations are in the country of execution, regardless of whether the services provided include a direct procurement or construction scope, or whether the construction scope will involve foreign migrant labour. For example, projects located in countries with a higher prevalence of or vulnerability to modern slavery are of higher risk. Projects that involve a construction scope of service have a higher risk of modern slavery than project services involving front-end engineering and design, study or project/programme management consulting (PMC) services. PMC services, however, may involve helping our customers manage their procurement or construction projects where Bechtel has less visibility into customer procurement supply chains, or the construction labour force used in those projects. Projects using foreign migrant labour for the construction scope have a higher risk of modern slavery than projects using local construction labour. Finally, projects with large procurement scopes involving obtaining materials and services required to construct large and/or complex projects are of higher risk because of the complexity and scale of supply chains.

With respect to the supply chain, across all of Bechtel's business lines, during financial year 2022, Bechtel's procurement and contracts group worked with approximately 5,500 suppliers of equipment, materials, and services from 50 countries and issued 35,000 transactions with total commitments exceeding \$11.6 billion. Bechtel continues to review the methods used to identify, screen, award, and monitor suppliers for modern slavery and human trafficking risk. Our assessments continue to begin by highlighting those countries that have a higher potential for modern slavery or human trafficking.

This assessment is then tailored for specific projects based on the type of goods or services that are forecast to be purchased in those countries. Using this approach, additional due diligence and monitoring is performed for those suppliers that are providing identified goods and services within high-risk countries.



1. Our Commitment

a. Policies Against Human Trafficking and Slavery

Bechtel's policies apply across its group of companies, including BLTD, BAPL, and BWAPL. Bechtel's Human Trafficking and Slavery and Sustainability Policies reflect our commitment to maintaining a work environment free from human trafficking, slavery, servitude, and forced or compulsory labour. Respecting human rights everywhere, we operate in accordance with the spirit and intent of the United Nations Guiding Principles on Business and Human Rights. Bechtel maintains systems and processes to avoid complicity in any practice that constitutes human trafficking or slavery.

b. Ethics and Compliance

Bechtel's [Code of Conduct](#), which is published in seven languages, makes clear that we are committed to ensuring that there is no form of modern slavery or human trafficking in our supply chain or in any part of our business and that Bechtel does not tolerate the use of either in the performance of Bechtel contracts by our employees, contractors, business partners, or suppliers. [The Code of Conduct](#) instructs employees to immediately report any concerns about any issue or suspicion of modern slavery or human trafficking to their supervisor, Ethics & Compliance Officer, the Legal Department, or the Ethics HelpLine. Our employees are responsible for complying with our policies and the Code of Conduct, and violation of them is subject to discipline, up to and including termination.

Bechtel encourages our employees, suppliers, subcontractors, and other third-party business partners to ask questions about our Code of Conduct and to report any issues, concerns, or suspicions of modern slavery or human trafficking. We have an Ethics HelpLine available as a confidential resource on the internet at HelpLine.Bechtel.com, by email at ethics@bechtel.com, or by phone at 1-800-BECHTEL (1-800-232-4835) from the USA, 0800-206-1009 from the UK, and 1-800-316-704 from Australia. Where permitted by law, the Ethics HelpLine allows anonymity. We do not tolerate threats or acts of retaliation against anyone for raising legitimate concerns, and we are committed to addressing each concern in a prompt and responsible manner.

c. Training and Awareness

Our online and instructor-led course entitled "Human Trafficking and Modern-Day Slavery" is available to all Bechtel employees in English and Spanish. It focuses on how to identify the warning signs of modern slavery and how to manage it, and it incorporates mini tests requiring the application of training knowledge to potential real-world scenarios. The course is mandatory for specific functions of employees who, due to the nature of their work, function, or location, may be more likely to encounter signs of modern slavery. A workshop format, designed with the flexibility to address local issues and risks and share best practices on how to manage them, is also available to project management teams where human trafficking and forced labour may be a higher risk on project sites. In 2022, across all business lines, 3,262 employees completed the course.

During 2022, BWAPL further developed a desktop risk assessment tool for project contracts and procurement teams, and deployed the tool to an active Australian project. All employees responsible for sourcing for the project have

completed training on the use of the tool and are actively engaged in the early identification of potential risks in our supply chain for the project.

d. Upfront Risk Assessment and Mitigation Planning

Bechtel policy requires an upfront risk assessment before commitment can be made to a customer's project. This includes identifying sustainability risks, which includes not only environmental risks, but risks to the safety and well-being of the people and communities who can be affected by our projects and reputational risks arising from association with or performance of services for a customer whose reputation for business practices and ethics does not match our own.

Similarly, Bechtel policy requires due diligence and corporate approval before entering project-specific or multi-project joint associations, including joint venture or consortium partners, to ensure that the proposed third-party associate has ethical standards compatible with our own. Specifically, joint association approval requests must address any character, reputation, ethics or compliance issues and the proposed associate's commitment to Bechtel's standards regarding ethics, compliance with laws, health, safety, the environment, and sustainable development. This upfront risk assessment encourages early and proactive risk mitigation planning and actions.

“Ready Reckoner” Risk Assessment Tool

In 2022, BAPL and BWAPL continued to refresh the supply chain risk assessment on our active EPC projects in Australia and to develop tools for projects to self-assess their supply chain compliance to the Australia Modern Slavery Act 2018. The “ready reckoner” risk assessment tool, which was piloted in 2021, has now been deployed on an active project in Australia. The tool provides guidance for project procurement teams to quickly complete an initial assessment based on commodity and country, and to identify red flags at any stage of the procurement process. The risk framework comprises three “triggers” of potential human rights related risks, all of which have been utilized to produce a risk matrix.

1. **Country** – external sources such as the Global Slavery Index, U.S State Department and Labour Organizations identify and rank countries with a high prevalence of forced labour, trafficking, and other forms of modern-day slavery.
2. **Goods & Services** – External sources such as the Global Slavery Index identify the types of goods and service with a high prevalence of forced labour and other forms of modern-day slavery.
3. **Sector** – External sources identify industries and sectors with a high prevalence of forced labour and other forms of modern-day slavery.

The tool also provides guidance for the reporting process and remediation based on the level of risk identified. Bechtel is exploring opportunities to roll out the tools across a broader section of project environments once they reach the execution stage.

2. Foreign Migrant Workers

The technical challenges of large engineering and construction projects combined with the lack of sufficiently skilled craft professionals in many countries means that some of our customers' projects require the recruitment of foreign migrant workers. The recruitment and employment process of craft professionals varies from project to project. Bechtel, a joint venture partner, or subcontractors may have varying levels of responsibility or shared responsibility over the process. However, regardless of who has the responsibility, Bechtel seeks customers, partners, and subcontractors who share our values and promotes global standards of ethical business conduct through these relationships. Bechtel's Guiding Principles on the Recruitment and Employment of Foreign Migrant Workers ensures a consistent approach to ethical recruiting and managing of foreign migrant workers, engaging our joint venture partners who may be responsible for recruiting and managing migrant workers, and communicating our standards to customers and other external stakeholders. The Guiding Principles provide that:

- Relevant policies and procedures should treat migrant workers fairly and without any form of discrimination.
- Contract terms and conditions should be written and communicated in a manner that is understood by migrant workers, and employment should be with a recognized and authorized employer in the country of work.
- No recruitment or placement fees should be collected.
- National passports, identity, and residency documents should be accessed freely by migrant workers.
- Wages should be paid regularly and directly to migrant workers per contract terms.
- Freedom to join worker associations and bargain collectively should be available to migrant workers.
- Migrant workers should be provided with humane, safe, and secure working conditions, accommodation, and transportation between the work site and living quarters.

- Migrant workers should not be subjected to any form of intimidation or inhuman treatment, including in disciplinary matters.
- Access to legitimate grievance mechanisms and resolution processes should be provided to migrant workers without fear of retaliation or dismissal.
- Upon completion of work, or under special circumstances, as per contract terms, migrant workers should be able to return to their home country or seek other employment, in the country of work, without restrictions.

On projects in which Bechtel controls the recruitment and employment process, our contracts for recruitment services clearly state that Bechtel does not tolerate activities that support trafficking in persons, including the use of slavery, forced labour, child labour, or human trafficking, and require the contractor to represent it will adhere to these standards and not use any form of forced, bonded, compulsory labour, slavery, or human trafficking. They also require an identical representation in any third-party contracts used in providing the recruitment services. For recruitment services of Craft Professionals in the Philippines and India, Bechtel only works with two agencies with whom there is an established long-term relationship. These organisations have demonstrated their alignment with Bechtel on standards with regard to ethical recruitment practices. Bechtel recruitment teams work closely with these organisations in the region and oversee their practices to ensure this continued alignment. Regarding the worker's employment contract, recruitment services contractors are required to provide the worker sufficient time and opportunity to read the entire agreement. When needed, the recruiter is also required to read the agreement to the worker in the worker's language and answer all the worker's questions relating to the agreement in the worker's language to ensure full understanding before signing. In addition, Bechtel's contracts specifically prohibit recruitment services contractors from accepting or requesting any payment of any kind from any potential worker. To assess the effectiveness of such prohibition, in Bechtel recruitment offices in the Philippines and India, candidates are asked by the Bechtel recruitment representatives about whether the candidate worker has paid any such fees to any agencies during the screening processes. After the conclusion of the Trade Test and Medical processes, Bechtel representatives ask candidates this question again in their induction prior to travel to the designated projects.

On projects in which Bechtel does not control the recruitment and employment process, Bechtel uses its influence and available leverage to steer the controlling party towards the best practices reflected in Bechtel's Guiding Principles on the Recruitment and Employment of Foreign Migrant Workers.

3. Supply Chain

Bechtel manages modern slavery and human trafficking risks in our supply chain by establishing clear expectations with our supply chain, conducting due diligence reviews of suppliers, incorporating terms and conditions relating to modern slavery and human trafficking in awarded contracts, and conducting in-shop or desktop reviews of suppliers during performance to identify potential issues.

a. Setting Clear Expectations

We set clear expectations related to human rights and anti-slavery for our supply chain through our [Suppliers & Contractors Portal](#), [Supplier Guide: Executing Work with Bechtel 2023](#), and [Bechtel's Expectations for Suppliers' and Subcontractors' Conduct](#).

In addition to stating that Bechtel does not tolerate the use of slavery, servitude, forced or compulsory labour, or human trafficking, these publications provide that Bechtel expects suppliers and subcontractors to:

- Employ workers above the applicable minimum age requirement.
- Maintain a workplace free from threats of violence, physical abuse, or other conduct that fails to respect the safety and dignity of the worker.
- Comply with applicable wage laws and, upon end of employment, pay for return transportation costs for workers recruited from outside the country.
- Not charge workers' recruitment fees or utilize firms charging workers such fees, and not utilize fraudulent or misleading recruitment practices.
- Not withhold a worker's passport or immigration documents.

- Provide workers a process for escalating and reporting concerns without retaliation.
- Develop policies prohibiting slavery and human trafficking and train their staff on how to identify such practices.
- Contractually require their suppliers to conform to the same standards.

In addition, although Bechtel is not a manufacturer and is a privately held company, we expect our suppliers to adhere to Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, which aims to prohibit the use of conflict minerals (gold, tungsten, tantalum, and tin) from the Democratic Republic of the Congo or adjoining countries. Suppliers are expected to conduct due diligence to preclude the sales or installation of any materials or equipment that contain conflict minerals.

b. Identifying, Selecting, and Contracting with Suppliers

Suppliers managed by our Procurement function go through a restricted parties list review that vets the suppliers across 40 different databases, identifying companies with a human trafficking history. We also review all suppliers against our internal warnings and advisories, which identifies concerns raised in the performance of prior work with Bechtel. Next, we apply a risk-based due diligence vetting process of suppliers focusing on locations, scopes of work, and the nature and value of the products or services that have a higher risk of modern slavery or human trafficking and conduct additional reputation and media report screenings.

Depending on various commercial factors, Bechtel may engage joint venture partners or exclusive subcontractors before bid submittal. Before Bechtel contracts with them, these companies undergo an enhanced due diligence review that involves screening for any ethics and compliance red flags, including modern slavery and human trafficking.

Once vetted and selected, Bechtel's standard contract terms and conditions require that no human trafficking or slavery is used anywhere in the supplier's or subcontractor's business or by any of the suppliers or subcontractors in its own supply chain. Bechtel seeks to implement its standard terms and conditions or equivalent terms on human trafficking or slavery. Our suppliers and subcontractors agree to comply with all applicable local and national laws and regulations. We have the right to terminate contracts with suppliers and subcontractors that breach our terms and conditions.

Our standard terms and conditions also provide that, at the project site, all suppliers and subcontractors must comply with Bechtel's rigorous safety and health plan. This plan includes Bechtel's core processes for safety and health to ensure all workers—both Bechtel's and its supply chain's—adhere to our zero-accident values.

c. Assessing Effectiveness by Managing and Monitoring Supplier Relationships and Performance

In addition to upfront vetting and contract requirements, Bechtel manages and monitors its supplier relationships and supplier performance. Bechtel Supplier Quality & Expediting's (BSQE's) primary function is communication with and visits to supplier facilities reinforcing our proactive approach to resolving potential issues, which helps suppliers deliver consistent value in a timely manner. To verify compliance with purchase order requirements and specifications, supplier quality surveillance is performed in accordance with approved quality surveillance plans. Our quality surveillance checklist and report for our suppliers' facilities includes a Sustainability Section requiring the assessor to identify and report any signs of underage workers, involuntary labour, or worker abuse and to identify any indications of worker restrictions that might prevent reporting of grievances or concerns. If any issue is flagged by the assessor, it goes directly to the project representative and BSQE supervisor and management for review and follow-up, and all records are kept in our supplier quality database. In consultation with BSQE, projects may choose to engage a third-party provider to conduct a workplace conditions assessment or initiate an investigation if a positive flag is identified during a BSQE surveillance assignment.

Along with supplier quality surveillance, we annually identify our key suppliers based on spend and provision of critical equipment or services, and conduct a desktop review of a select group of their policies and approaches to many areas of sustainability, including modern slavery and human trafficking. The suppliers and subcontractors targeted for review are sent a survey and their responses are scored. For responses deemed deficient, there is a cure period. Failure to cure deficiencies results in a supplier advisory being issued to Bechtel's procurement and contracts personnel, which remains in place until the deficiencies are rectified. Where we have higher risk suppliers, e.g., countries without strong labour laws or identified modern slavery issues, we have a process for engaging a third-party entity to conduct a review of the

supplier's facility. Where we find corrective actions are needed, we will brief the supplier, and conduct a follow-on review of corrective actions taken.

Bechtel Global Logistics (BGL), a discipline focusing on the safe, timely, and cost-effective delivery of materials and equipment, works to raise awareness of human trafficking within the transportation industry and across multiple modes of transportation (e.g., ports, roads, etc.) by sponsoring regular discussions on the subject with the U.S. Exporters Competitive Maritime Council and various industry conferences, as well as encouraging BGL's logistics service providers to share information, lessons learned, and methods they are employing to reduce the risk of human trafficking in the transportation and logistics industry.

4. Assessing Effectiveness by Audit and/or Adoption of Compliance Plans

Audit and compliance plans are important tools in ensuring that corporate policies and procedures relating to human trafficking and slavery are being implemented and cascaded throughout the Bechtel group of companies and that contract provisions relating to the same are being complied with.



a. Corporate Internal Audit

Bechtel's Internal Audit function provides an independent evaluation of internal controls over: (i) compliance with policies and procedures; (ii) the reliability and integrity of information provided to management; and (iii) processes which safeguard the group of companies' assets. With respect to modern slavery, Bechtel's Internal Audit function verifies that human trafficking terms and conditions are incorporated in project pro formas and in sample purchase orders and subcontracts for those projects included in the Internal Audit Annual Audit Plan. In addition, when project payroll is audited, Internal Audit monitors whether hours worked by project personnel are potentially at risk of violating local labour laws. Internal Audit identifies projects for inclusion in its annual audit plan through an assessment of risk attributes of active projects. The risk attributes that overlap with modern slavery risk are country of execution, and procurement and construction scopes of work. Bechtel entities and projects are audited based on risk; not all are audited annually.

b. Project Self-Assessments and Audits of Suppliers

In 2022, we continued to deploy the self-assessment tool on implementation of the Building Responsibly Guidance Notes on Worker Welfare. This questionnaire is completed collaboratively via onsite visits with the project teams. It has also been included in the Mental Health Planning toolkit for Project Managers with the idea that projects effectively implementing the Worker Welfare Principles are less likely to experience mental health and safety issues across the workforce.

Based on the risk assessment of suppliers described in section 1d, suppliers that fall into the highest risk category will be the subject of additional monitoring activity which may include third party audits.

c. Project Compliance or Management Plans

Compliance plans are a tool for ensuring effectiveness of policies and contract provisions relating to human trafficking and slavery. For instance, our Nuclear, Security & Environmental GBU performs work under United States Government contracts that may incorporate the Federal Acquisition Regulation Clause FAR 52.222-50 regarding "Combating Trafficking in Persons." Its policy to combat trafficking in persons identifies compliance plans, addressing such subjects as awareness, reporting, monitoring, recruiting, and housing, as a potential method for ensuring compliance. To build employee awareness and support compliance with these requirements, Combating Trafficking in Persons content was included in Commercial Awareness briefings provided to projects in 2022.

Industry Engagement

We understand the importance of engaging and collaborating with the broader engineering and construction industry to promote best practices and elevate standards to prevent forced labour, human trafficking, and worker abuses. That is why Bechtel was one of the founding members of [Building Responsibly](#), a group of engineering and construction companies working together to raise the bar in promoting the welfare of workers across the industry. Bechtel co-chairs the steering committee and is now working with the other members to pilot implementation tools such as the site-specific self-assessment and Grievance Mechanism (GM) benchmarking tool to better understand whether the GM metrics are effective at identifying issues. In 2022, Building Responsibly focused on facilitating peer learning opportunities for countries to share their implementation focus areas and techniques, and compare good practices with one another. Bechtel presented on our supply chain risk assessment process to target suppliers at greatest risk based on objective third party sources and meta-analyses. Building Responsibly also held its first Stakeholder Engagement Forum since before the pandemic, in which stakeholders expressed a strong interest in companies interviewing workers directly to assess effectiveness of worker welfare principles implementation and detect violations.

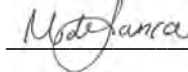
Bechtel also serves as co-chair of the [Corporate Responsibility and Labor Affairs Committee of the U.S. Council for International Business](#), an association of 300 U.S. multinational companies. The Committee promotes policies and practices to international standard-setting bodies to strengthen governments' responsibilities to develop and enforce legislation and regulation to prevent modern slavery and engage companies to share their experiences and best practices. We will continue to engage with diverse organisations to help advance a safer, healthier environment for all workers in the engineering and construction sector and other industries.

Process of Consultation

Because employees, officers, GBU managers, and several functional groups (e.g., Contracts & Procurement, Human Resources and Global Workforce Services, Ethics & Compliance, Sustainability) are responsible for applying Bechtel's policies against human trafficking and modern slavery, a cross-GBU and cross-functional group was created to share updates, ideas, and good practices relating to human trafficking and modern slavery across the Bechtel group of companies and to support the development of goals and the implementation of relevant policies, principles, processes, and legislation. In addition, the group supports Bechtel's 2030 enterprise goal to engage 100 percent of our key suppliers to promote sustainability in the delivery of materials and services, and prevent modern slavery, including within their own supply chains. This group includes representatives of the four GBUs and representatives located in, or with responsibility over, the key regions in which Bechtel operates, including the United Kingdom and Australia.


This Statement was prepared in consultation with this cross-GBU and cross-functional group, the Corporate Manager of Sustainability, the Corporate Legal Department, the Heads of Legal for each of the GBUs and the Manufacturing and Technology business, and with select members of the Boards of BLTD, BAPL, and BWAPL prior to review and approval by the Boards of BLTD, BAPL, and BWAPL.

For and on behalf of Bechtel Limited:



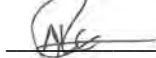
Michelle de Franca, Managing Director

For and on behalf of Bechtel Australia Proprietary Limited:



R. Leigh Clifford, Director and Chairman

For and on behalf of Bechtel (Western Australia) Pty Ltd:



Nicholas E. Robertson, Director

Content Cross-Referenced to MSA Reporting Criteria

UK Modern Slavery Act 2015, Section 54(5)'s Recommended Reporting Criteria	Australia Modern Slavery Act 2018, Section 16(1)'s Mandatory Reporting Criteria	Sections Addressing Criteria
<ul style="list-style-type: none"> The organisation's structure, its businesses, and its supply chains 	<ul style="list-style-type: none"> Identify the reporting entity Describe the structure, operations, and supply chains of the reporting entity Describe the process of consultation with (i) any entities that the reporting entity owns or controls and, (ii) for joint modern slavery statements, the entity giving the statement 	<p>The Reporting Companies</p> <p>Our Business</p> <p>Process of Consultation</p>
<ul style="list-style-type: none"> Its policies in relation to slavery and human trafficking 		<p>Our Commitment (and subsections)</p>
<ul style="list-style-type: none"> Its due diligence processes in relation to slavery and human trafficking in its businesses and supply chains The parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk 	<ul style="list-style-type: none"> Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes 	<p>Due Diligence, Risk Assessment, & Management (and subsections)</p>
<ul style="list-style-type: none"> Its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate 	<ul style="list-style-type: none"> Describe how the reporting entity assesses the effectiveness of such actions 	<p>Foreign Migrant Workers</p> <p>Assessing Effectiveness by Audit and/or Adoption of Compliance Plans (and subsections)</p>
<ul style="list-style-type: none"> The training about slavery and human trafficking available to its staff 		<p>Training & Awareness</p>
	<ul style="list-style-type: none"> Include any other information that the reporting entity, or the entity giving the statement, considers relevant 	<p>Industry Engagement</p>

