



Modern Slavery Act Statement

Financial Year 1 January 2023 – 31 December 2023

Contents

- 1. The Reporting Companies.....2
 - UK Modern Slavery Act 2015 reporting “Commercial Organisation”2
 - Australian Modern Slavery Act 2018 “Reporting Entities”2
 - Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (“Canadian Modern Slavery Act”) “Entities” with a Reporting Obligation.....2
- 2. Our Business.....3
- 3. Due Diligence, Risk Assessment, and Management3
 - a. Policies Against Human Trafficking and Slavery.....4
 - b. Ethics and Compliance5
 - c. Training and Awareness5
 - d. Upfront Risk Assessment and Mitigation Planning.....5
 - e. Foreign Migrant Workers6
 - f. Supply Chain.....7
 - Setting Clear Expectations.....7
 - Identifying, Selecting, and Contracting with Suppliers.....7
 - Assessing Effectiveness by Managing and Monitoring Supplier Relationships and Performance.....8
 - g. Assessing Effectiveness by Audit and/or Adoption of Compliance Plans8
 - Corporate Internal Audit.....9
 - Project Self-Assessments and Audits of Suppliers.....9
 - Project Compliance or Management Plans.....9
 - i. Steps Taken During 2023 To Prevent or Reduce the Risk of Forced Labour and Child Labour.....9
 - h. Remediation10
- 4. Industry Engagement.....10
- 5. Process of Consultation.....10
- Appendix: Content Cross-Referenced to MSA Reporting Criteria12

1. 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 U.K. Modern Slavery Act 2015, and constitutes its Modern Slavery Act Statement for the financial year 1 January 2023 - 31 December 2023. 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 16 April 2024.

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 2023 - 31 December 2023. 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 24 April 2024. 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 24 April 2024.

Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (“Canadian Modern Slavery Act”) “Entities” with a Reporting Obligation³

This statement is also made on behalf of Bechtel Canada Co. (BCANDCO) and Northbech Co. (NOBC), both members of the Bechtel group of companies, pursuant to the reporting requirements of Part 2 of the Canadian Modern Slavery Act⁴ and constitutes their annual report for the financial year 1 January 2023 - 31 December 2023. BCANDCO is a proprietary company registered in Nova Scotia, Canada (company number 3053855), with its registered office at 600-1741 Lower Water Street, Halifax, NS, B3J 0J2, Canada. BCANDCO's board of directors approved this statement on 9 April 2024. BCANDCO is a wholly owned subsidiary of NOBC, which is a non-operating holding company. NOBC is a proprietary company registered in Nova Scotia, Canada (company number 3056281) with its registered office at Queen's Marque, 600-1741 Lower State Street, P.O. Box 997, Halifax, NS, B3J 2X2, Canada. NOBC's board of directors approved this statement on 16 April 2024.

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 2023 - 31 December 2023) to address and mitigate those risks.

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

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

³ Sections 2 and 9 of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* sets out the “Entities” required to prepare a modern slavery-related annual report.

⁴ NOBC is also a shareholder of Bantrel Co., which will file a separate annual report under the Canadian Modern Slavery Act.

2. Our Business

Bechtel is a trusted engineering, construction, and project management partner to the 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.

We operate through five global business units (GBUs):

- **Infrastructure**, headquartered in London, with projects across the globe.
- **Nuclear, Security, & Environmental**, headquartered in Reston, Virginia, with offices in Knoxville and Oak Ridge, Tennessee, and projects in the United States and allied nations.
- **Energy**, headquartered in Houston, Texas, 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.
- **Manufacturing and Technology**, headquartered in Reston, Virginia, with an office in Chandler, Arizona, and projects in the United States and Europe.

BLTD operated across the Energy, Mining & Metals, and Infrastructure GBUs during 2023.

BAPL and BWAPL operated across the Energy and Mining & Metals GBUs during 2023.

BCANDCO and NOBC operated across the Energy, Mining & Metals, and Infrastructure GBUs during 2023. They operate across Canada, predominantly in Alberta, Ontario, and Manitoba, and their activities include engineering, procurement, and construction management.

Core to Bechtel are our [Vision, Values, and Commitments](#) (VV&Cs). They are what we believe in, what our customers expect, and how we deliver. Consistent with our VV&Cs, 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.

3. 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, including the goods and services sourced. 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, Canada, and the United States. Even where a permanent office is in a country where the 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 may 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.

Another factor affecting the risk of modern slavery in our project operations is the country of execution, regardless of whether the services provided include a direct procurement or construction scope or whether the construction scope involves foreign migrant labour. Projects located in countries with a higher prevalence of, or vulnerability to, modern slavery are at higher risk. For example, we consider projects undertaken in Canada to be low risk because they involve primarily highly skilled workers and office workers as well as workers who are permanent residents of Canada. Projects that involve a construction scope of service have a higher risk of modern slavery than projects 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, direct-hire construction labour. Finally, projects with large procurement scopes involving obtaining materials and services required to construct large and/or complex projects can be of higher risk because of the complexity and scale of the global supply chains.

With respect to the supply chain, across all of Bechtel's business lines and in all countries in which Bechtel does business, during the 2023 financial year, Bechtel's procurement and contracts group worked directly with approximately 7,000 suppliers of equipment, materials, and services from 45 countries and issued 44,500 orders with USD 16.1 billion total commitments.⁵

Bechtel continues to review the methods used to identify, screen, award, and monitor suppliers for modern slavery and human trafficking risk. We include such terms in our orders and obtain commitment from our suppliers and subcontractors towards [Bechtel's Expectations for Suppliers' and Subcontractors' Conduct](#).

The assessment and due diligence process involves highlighting those countries and products or services 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 suppliers providing identified goods and services within high-risk countries.

Our recent evaluation of modern slavery and human trafficking risk involving certain countries determined that four of those countries — Afghanistan, United Arab Emirates, Turkey, and Saudi Arabia — were ranked among the 10 countries estimated to have the highest prevalence of modern slavery according to the Global Slavery Index from WalkFree. In addition, high-risk commodities and services were identified using the Responsible Sourcing Tool. These commodities include steel products, galvanized products, and products containing aggregate. Less than 6.5% of Bechtel's commitments in 2023 were for these higher risk products. Of those, most commitments were made in countries with low or very low prevalence scores per the Global Slavery Index. These higher risk commodities were only purchased from one country with a prevalence score over 10 in 1000: the United Arab Emirates (UAE). In 2023, Modern Slavery Audits were performed at the two UAE suppliers representing 92% of spend committed within the UAE, and no evidence of forced labour or child labour was found.



a. Policies Against Human Trafficking and Slavery

Bechtel maintains systems and processes to avoid complicity in practices that constitute human trafficking or slavery. Bechtel's policies apply across its group of companies, including BLTD, BAPL, BWAPL, BCANDCO, and NOBC. Bechtel

⁵With respect to Canada specifically, in 2023, BCANDCO and NOBC committed total funds of USD 19.7 million in goods and services to suppliers and contractors, of which the vast majority of spend was for construction services at the respective project site(s). Goods procured were primarily construction consumables and approximately USD 5,000 were imports to Canada.

maintains policies on human trafficking and sustainability that reflect our commitment to maintaining a work environment free from human trafficking, slavery, servitude, and forced or compulsory labour. Bechtel respects human rights everywhere and operates in accordance with the spirit and intent of the United Nations Guiding Principles on Business and Human Rights.

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 (including forced labour or child labour) 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 United States and Canada, 0800-206-1009 from the United Kingdom, 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 assessments 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 at a higher risk on project sites. In 2023, across the enterprise, 5,251 employees completed the course.

In 2023, Bechtel conducted a high-level gap analysis of policy compliance in relation to modern slavery. Through this analysis, certain opportunities for improvement were identified, including updating the Human Rights Guidance and increasing the digital scanning of supply chain risk and standardized prequalification questionnaires. We started work on these items in 2023 and will continue in 2024.

Throughout the year, Bechtel also issued communications focusing on highlighting Human Rights risks, including Human Rights Day marking the 75th anniversary of the Universal Declaration of Human Rights (UDHR). These communications were shared across our global business units to provide global reach within our employee network.

d. Upfront Risk Assessment and Mitigation Planning

Bechtel policy requires an upfront risk assessment before a commitment can be made to a customer's project. This includes identifying sustainability risks, which include not only environmental risks but also risks to the safety and well-being of the people and communities who can be affected by our projects, as well as 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 and human trafficking policies and procedures that are compatible with our own. 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, legal compliance, health, safety, the environment, and sustainable

development. This upfront risk assessment encourages early and proactive risk mitigation planning and actions, including human trafficking policies and procedures.

e. 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 promote global standards of ethical business conduct through these relationships. Bechtel's Guiding Principles on the Recruitment and Employment of Foreign Migrant Workers provides a consistent approach to ethically recruiting and managing 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 requires the contractor to represent that it will adhere to these standards and not use any form of forced, bonded, compulsory labour, slavery, or human trafficking.

We 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 continued alignment. Regarding the worker's employment contract, recruitment services contractors are required to provide the worker documentation in their native language and give 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 a 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. This is through both contractual commitments and ongoing auditing and compliance work throughout the project execution.

f. 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.

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](#), 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 the end of employment, pay 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 with 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.

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 focusing on suppliers' 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 submission. 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 a supplier or subcontractor has been 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 that all workers — both Bechtel's and its supply chain's — adhere to our zero-accident values.

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 to communicate with and visit 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 the reporting of grievances or concerns. If any issue is flagged by the assessor, it goes directly to the project representative and BSQE supervisor and BSQE management for review and follow up. All records are kept in our supplier quality database. In consultation with BSQE, projects may engage a third-party provider to conduct a workplace conditions assessment or investigate if a positive flag is identified during a BSQE surveillance assignment.

Along with supplier quality surveillance, we annually identify our key suppliers based on spending and the provision of critical equipment or services, as well as 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 will result 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., in countries without strong labour laws or with 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 the 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.

g. 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.



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 that 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 risks are the country of execution, and the procurement and construction scopes of work. Bechtel entities and projects are audited based on risk; not all are audited annually.

Project Self-Assessments and Audits of Suppliers

In 2023, we continued to deploy a self-assessment tool as part of our 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 3d, suppliers that fall into the highest risk category are subject to additional monitoring activity, which may include third-party audits.

Project Compliance or Management Plans

Compliance plans are a tool for ensuring the effectiveness of policies and contract provisions relating to human trafficking and slavery. For instance, our Nuclear, Security, & Environmental GBU (NS&E) 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 subjects such as awareness, reporting, monitoring, recruiting, and housing, as potential methods for ensuring compliance. To build employee awareness and support compliance with these requirements, Combating Trafficking in Persons content was included in the Commercial Awareness briefings and U.S. government contracting compliance training provided to NS&E projects in 2023.

i. Steps Taken During 2023 To Prevent or Reduce the Risk of Forced Labour and Child Labour

As described more fully in the above sections, the following are some of the steps taken by Bechtel during the 2023 financial year to prevent or reduce the risk of forced labour and child labour:

- Maintained policies, systems, and processes aimed at respecting human rights and avoiding complicity in any practice that constitutes human trafficking or slavery.
- Required that employees immediately report any concerns about any issue or suspicion of modern slavery, including child labour.
- Made clear that we are committed to ensuring that there is no form of modern slavery (including forced labour or child labour) or human trafficking in our supply chain or in any part of our business. This includes within the performance of Bechtel contracts by our employees, contractors, business partners, or suppliers.
- Promoted the use of and specified the purpose of the Ethics HelpLine, available in Canada, the United Kingdom, and Australia by internet, email, and phone.
- Conducted appropriate upfront risk assessments, including identifying sustainability risks, which include risks to the safety and well-being of the people and communities who can be affected by our projects.

- Conducted due diligence 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 and human trafficking policies and procedures compatible with our own.
- Made available to all Bechtel employees, including those in Canada, the United Kingdom, and Australia, our online (with an option of instructor-led) course entitled “Human Trafficking and Modern-Day Slavery.”

h. Remediation

During the 2023 reporting period, the reporting entities did not identify any instances of forced labour or child labour in their operations or supply chain. As a result, there is nothing to report with respect to measures taken by the reporting entities to remediate (i) instances of any forced labour or child labour, or (ii) the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in their activities and supply chains.

4. 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 abuse. 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 Building Responsibly steering committee and works with other members to identify additional implementation tools such as effectiveness assessments for site-specific project grievance mechanisms. Bechtel has also included the Worker Welfare assessment tool as a resource for developing Project Mental Health Plans.

In 2023, Building Responsibly continued to facilitate peer learning opportunities for companies to share their implementation successes and challenge areas as well as engage with others in the field, offering training and technology options to engage workers. Building Responsibly also held its first Stakeholder Engagement Forum in Asia and in Singapore to expand its global reach with focus topics on living and working conditions for migrant workers.

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.


5. 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. Through this group, we share updates, ideas, and good practices relating to human trafficking and modern slavery across the Bechtel group of companies and 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% of our key suppliers in promoting sustainability in the delivery of materials and services, and prevent modern slavery, including within their own supply chains. This group includes representatives of the five GBUs and representatives located in, or with responsibility over, the key regions in which Bechtel operates, including the United Kingdom, Australia, and Canada.

This statement was prepared in consultation with the cross-GBU and cross-functional group, the Corporate Manager of Sustainability, the Corporate Legal Department, the Heads of Legal for each of the relevant GBUs, and with select


members of the Boards of BLTD, BAPL, BWAPL, BCANDCO, and NOBC prior to review and approval by each of those Boards.

For and on behalf of Bechtel Limited:

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David King, Managing Director

For and on behalf of Bechtel Australia Proprietary Limited:

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Shaun Kenny, Managing Director

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

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Nicholas E. Robertson, Director

This report was approved pursuant to subparagraph 11(4)(b)(i) of the Canadian Modern Slavery Act by the boards of directors of BCANDCO and NOBC.

In accordance with the requirements of the Canadian Modern Slavery Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this report for the entity specified below. Based on our knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects, for the purposes of the Canadian Modern Slavery Act, for the financial year 1 January 2023 - 31 December 2023.

I make the above attestation in my capacity as a director of the board of directors of Bechtel Canada Co. (the "**BCANDCO Board**") for and on behalf of the BCANDCO Board.

I have the authority to bind Bechtel Canada Co.

Per:  _____

Full Name: Martyn Daw

Title: Director and Chair

Date: April 9, 2024

I make the above attestation in my capacity as a director of the board of directors of Northbech Co. (the "**NOBC Board**") for and on behalf of the NOBC Board.

I have the authority to bind Northbech Co.

Per:  _____

Full Name: Martyn Daw

Title: Director

Date: April 9, 2024

Appendix: 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	Canadian Modern Slavery Act, Section 7(1) and (2)'s 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 	<ul style="list-style-type: none"> The entity's structure, activities and supply chains 	<p>The Reporting Companies</p> <p>Our Business</p> <p>Due Diligence, Risk Assessment, and Management</p> <p>Process of Consultation</p>
<ul style="list-style-type: none"> Its policies in relation to slavery and human trafficking 		<ul style="list-style-type: none"> Its policies in relation to forced labour and child labour 	<p>Policies Against Human Trafficking and Slavery</p> <p>Ethics and Compliance</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 	<ul style="list-style-type: none"> Its due diligence processes in relation to forced labour and child labour The parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk 	<p>Due Diligence, Risk Assessment, & Management (and subsections)</p> <p>Upfront Risk Assessment and Mitigation Planning</p> <p>Supply Chain</p>

UK Modern Slavery Act 2015, Section 54(5)'s Recommended Reporting Criteria	Australia Modern Slavery Act 2018, Section 16(1)'s Mandatory Reporting Criteria	Canadian Modern Slavery Act, Section 7(1) and (2)'s Reporting Criteria	Sections Addressing Criteria
<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 	<ul style="list-style-type: none"> How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains. The steps the entity has taken during that year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity 	<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 	<ul style="list-style-type: none"> 	<ul style="list-style-type: none"> The training provided to employees on forced labour and child labour 	<p>Training & Awareness</p>
<ul style="list-style-type: none"> 	<ul style="list-style-type: none"> 	<ul style="list-style-type: none"> Any measures taken to remediate any forced labour or child labour Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chain 	<p>Remediation</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>