



KBR Code of Business Conduct



We Are People of Integrity



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Stuart Bradie

President & CEO

A Message from Stuart Bradie, President and Chief Executive Officer

At KBR, we have built a stellar reputation for delivering solutions to our customers, and our employees have always strived to be the best at what they do. Being at our best means delivering with integrity. Integrity demands honesty, and honesty builds trust.

Our Code of Business Conduct (the “Code”) is essential to how we as a team of teams interact with the world around us and thus to our success. The Code aligns with our ONE KBR Values, and, in particular, “We are People of Integrity” guides us in everything we do.

KBR’s Code has been improved to provide all employees with practical guidance for day-to-day business situations. Our Code provides specific guidance that applies to each of us, regardless of business, region or department. It is important that we follow it in order to further enhance our culture of integrity and to safeguard ourselves and the company.

However, the Code may not cover every situation, and that is why we must be guided by our values and, specifically, integrity. I am wholeheartedly committed to promoting a culture where employees feel empowered to report any concerns about possible misconduct or behaviors that are contrary to our Code and our values without any fear of retaliation so any issues can be promptly addressed.

There may be instances where you have a question regarding certain compliance or ethical matters that concern you. Please seek advice or clarification from your manager or from the resources listed in our Code. The KBR Ethics Hotline is one of those resources that enables you to communicate with the Business Integrity Team confidentially or anonymously.

I am proud of KBR, its values and that We are People of Integrity every day. And I look forward to us all continuing to work together with the highest ethical standards so that we can safely and sustainably deliver on our promises and support each other and our customers both now and in the future.

We Are People of Integrity

- Our Vision and Values
- Our Code of Conduct
- Our Responsibilities
- How We Make Decisions
- How We Seek Help, Speak Up and Ask Questions
- We Respect Anonymity and Confidentiality
- We Do Not Tolerate Retaliation

Our Vision and Values

We strive to create a safer, more secure and sustainable world by bringing together the best and brightest to deliver technology and solutions that help our customers accomplish their most critical missions and objectives.

Our values are the essential and enduring principles that drive our day-to-day business activities and define us as a company.

We Value Our People

Our people are the heart of everything we do. We are dedicated to creating diverse and inclusive work environments in which every member of our team of teams feels safe, supported, respected, trusted and valued, and where each person is given opportunities to grow and reach their full potential.

We Deliver

We are our clients' trusted partner. We are uncompromising in our commitment to deliver innovative, high-quality, technology-led solutions for them, and exceptional, sustainable value for all our stakeholders, underpinned by strong commercial and operational discipline.

We Are People of Integrity

We are people of character, who value honesty, trust, courage, fairness, prudence and tenacity. We believe doing what's right for the planet, the communities where we live and work, and our people is good for our business. We will not sacrifice our integrity.



We Empower

We empower all our people with a shared purpose, the right tools and the supportive culture they need to be proactive, to be adaptive to change, and to succeed. We trust them to be independent decision-makers who aren't afraid to meet any challenge head-on and who proudly own their work.

We Are a Team of Teams

We have a will to succeed, individually and as a company, but we value the achievements of our team of teams over our individual accomplishments. Our collective focus powers our operational excellence, fuels our passion for delivering for our customers, and makes us a better, stronger, more effective and efficient company. We are ONE KBR.

Our Code of Conduct

Our Code of Business Conduct establishes a set of ethical standards and legal principles for everyone working for or on behalf of KBR. We conduct our business in compliance with our Code and all applicable laws. We also expect our business partners working with or on behalf of KBR to adhere to these same ethical standards.

The Code serves as a guide for how we conduct business and interact with our customers, our communities and each other.

If we aren't doing it with integrity, we aren't doing it right!

Any violations of this Code or the law may result in disciplinary action, up to and including termination. Read, understand and comply with our Code. Participate in any trainings related to our Code, and know how it applies to your role at KBR. As ONE KBR, our integrity depends on living our Code.





Our Responsibilities

We are all responsible for acting in accordance with our Code.

As employees we:

- Act honestly and ethically in all business dealings
- Comply with all applicable laws and the Code, as well as KBR's policies and procedures
- Promptly report any violations of the Code to a manager, the [People Function](#) (Human Resources), the [Legal Department](#), the [Business Integrity Team](#) or the Ethics Hotline at www.ethics.kbr.com
- Seek guidance from a manager or the [Legal Department](#) when faced with an ethical or legal challenge, or contact the [Ethics Hotline](#), where we can ask questions under the Question Manager function

Supervisors have additional responsibilities. These include:

- Modeling ethical behavior
- Promoting an ethical culture and integrity-based decisions
- Encouraging open communication and creating an environment where employees are comfortable with speaking up about concerns
- Providing guidance and feedback in response to questions and concerns
- Knowing when to report violations, escalate issues or seek help from company experts
- Ensuring that no employee is retaliated against for reporting potential violations of the Code or law

How We Make Decisions

Doing what's right is not always easy or clear. The Code is a useful tool, but it cannot provide guidance to every situation. Therefore, business decisions should always be based on integrity.



Click on the responses below to guide you in making integrity-based decisions.

Would this action possibly violate any laws or regulations?

Does this action align with our Code, policies and procedures?

Is this action in alignment with KBR's values and will it further our mission and enhance our reputation?

Would this action possibly harm our relationships with customers or business partners?

If this action was disclosed, would it show that I acted with integrity? Would I feel comfortable if this action was made public?

How We Seek Help, Speak Up and Ask Questions

As people of integrity, we have an obligation to report any suspected violation of the Code, and we expect employees and others to speak up by reporting unethical behavior and conduct inconsistent with our Code. This means speaking up about our concerns even if we aren't sure we have all the information. In many cases, we can bring our concerns to a manager, who can help us to discuss the best course of action.

The KBR Ethics Hotline is operated by an independent company. It is available 24 hours a day, seven days a week, in multiple languages. The Ethics Hotline can be used by anyone within or outside of KBR to make a confidential report.

The Ethics Hotline has a "Question Manager" feature where we can submit questions to or seek clarification on compliance or ethical issues from the Business Integrity Team. Like reports of possible violations, questions or concerns can be submitted to the Ethics Hotline anonymously.

At KBR, you may contact:

- Ethics Hotline (includes option to remain anonymous)
 - Web:
 - www.ethics.kbr.com
 - Call:
 - United States: (800) 461-9330
 - United Kingdom: 0808 189 1053
 - For telephone numbers in all other countries, consult www.ethics.kbr.com
 - Text "Report" to 832-479-1340 (Available in the U.S. only)



- Director of Business Integrity at fhokbrcode@kbr.com
- Business Integrity Team by mail:
 - P.O. Box 2464, Houston, TX 77252-2464 USA
- Appropriate representative of the KBR [Legal Department](#); [Audit Services](#); [People Function](#) (Human Resources); [Health, Safety, Security and Environment](#); or another compliance-related department
- Your supervisor or manager
- Member of the Executive Leadership Team



Learn More

[Frequently Asked Questions \(FAQs\) on Reporting](#)

We Respect Anonymity and Confidentiality

You may report concerns or suspected violations of the Code in confidence or anonymously. Anonymous reports can be made to the [Ethics Hotline](#) that is managed by an independent third party. If you make an anonymous report through the [Ethics Hotline](#), KBR will not know your identity, but will be able to communicate with you back and forth through the messaging system. If you choose to remain anonymous, we ask that you provide sufficient detail and factual information so that we can effectively follow up on your concern.

We Do Not Tolerate Retaliation

Our integrity demands that we speak up. We never retaliate against those who raise concerns in good faith. Our people and teams rely on transparency and honesty to do their best work. We cannot nurture those values in the face of intimidation or other negative repercussions. Such behavior is not tolerated in our workplaces, and we cooperate fully with any inquiries or investigations concerning allegations of misconduct.

KBR does not tolerate retaliation for reporting a potential violation of the Code or the law. KBR expects such reports to be made in good faith. This does not mean that the reporter must have all of the facts; the reporter should feel free to ask questions and report any issue that causes concern without fear of reprisal. Reports that are knowingly false or malicious, however, are not in good faith and may be grounds for discipline.

Prohibited retaliation can include harassment or intimidation against employees and others who report allegations of misconduct or encourage others to report. Retaliatory behavior of any kind, efforts to discourage reporting, and the concealment of misconduct are not consistent with our values and can result in disciplinary action, including termination.

Nothing in this Code prevents employees from exercising their legal rights or duties to report possible violations of law to the appropriate governmental authorities at any time, without reporting the matter to, or seeking prior authorization from, the Company.





Valuing Each Other

- We Keep Our Employees and Contractors Healthy and Safe
- We Foster a Respectful Workplace
- We Embrace Inclusion and Diversity

We Keep Our Employees and Contractors Healthy and Safe

KBR's business success depends on its ability to continually improve the quality of the services we provide, while also protecting the health, safety and security of those working directly and indirectly for the company. We require active commitment and accountability toward health, safety, security and environment (HSSE) from all employees and contractors. This commitment is in the best interests of our customers, employees, contractors, stakeholders and the communities in which we live and work.

How We Keep Our Employees and Contractors Healthy and Safe

- Protect and strive to improve the health, safety and security of our employees and contractors at all times
- Eliminate incidents through a Zero Harm culture
- Meet specified customer requirements and ensure continuous customer satisfaction
- Set HSSE objectives, measure results, and assess and continually improve processes and services through the use of an effective management system
- Line management should assume a leadership role in communication, implementation and compliance of HSSE policy and procedures
- Apply technical skills to all HSSE aspects of engineering and design
- Communicate openly with stakeholders and ensure an understanding of the HSSE policy, program and procedures
- Recognize outstanding HSSE performance



Zero Harm and Courage to Care

At KBR, we have a genuine belief that Zero Harm is achievable. We believe that all workplace incidents are preventable. Our [Courage to Care Conversation Process](#) is instrumental in developing a continual awareness of unsafe acts through observation, intervention and conversation. The goal of the [Courage to Care Conversation Process](#) is to continuously evaluate the work environment and to focus on people and their actions.

Unsafe acts are individual behaviors that can result in an incident. Upon observing an unsafe act, the [Courage to Care Conversation Process](#) requires the observer to take immediate action, not only to correct the unsafe act, but also to communicate their personal safety standard. This results in an understanding of the hazard and furthermore a commitment to safety from the individuals who observed and engaged in the unsafe act.



[Learn More](#)
[Global HSSE](#)

We Foster a Respectful Workplace

Because our people are the heart of everything we do, we believe all employees should be treated with dignity and respect. This means acknowledging each other's contributions based on merit and providing everyone with equal opportunities to contribute and succeed at KBR. We do not tolerate harassment or discrimination of any kind. To empower our teams to do their best work, we maintain work environments where everyone's rights and abilities are respected.

How We Foster a Respectful Workplace

- Always treat others with respect, whether interacting with team members, our customers or our business partners
- Be mindful of how our actions and words may be perceived by others
- We do not discriminate or engage in harassment based on the following:
 - Race
 - Color
 - Religious beliefs
 - National origin or ancestry
 - Sex, pregnancy, sexual orientation, gender, gender identity, gender expression, or transgender status
 - Physical or mental disability
 - Age
 - Veteran or military status
 - Genetic information
 - Any other status or characteristic protected by applicable law
- Never harass, intimidate or coerce in any way, including with sexual or suggestive comments or with threats of violence, unfavorable employment actions or promises of favorable employment actions
- Make all decisions on hiring and promotion based on merit and fairness
- Speak up if we experience or become aware of discrimination, harassment or disrespect in our workplaces





Understanding Harassment

While harassment may be intentional, it doesn't have to be. What is important is the perception. We should not do or say anything that others may perceive as offensive. Harassment can come in many forms:

- What we say or write, such as demeaning or offensive remarks or slurs including, but not limited to, those directed towards anyone's race, ethnicity or gender as well as sexual remarks or solicitations, or threatening or abusive language
- What we do, including unwelcome touching or blocking someone's path
- What we display, such as sexual or offensive images or websites opened up on an office computer
- What we communicate via electronic messaging or social media

Delivering Answers

Q I was recently hired as a member of the strategic development team. To get my workspace set up, I had a meeting with an internal IT assistant named Sam. While Sam was helping me with my computer settings, Sam placed his hand on my thigh. I didn't say anything, and Sam finished setting up my computer. I'm relieved the incident has passed, but now I'm nervous about contacting the IT department if anything needs to be repaired or updated. What should I do?

A Sam's behavior is unacceptable. Inappropriate touching has no place in a work setting. You should tell your manager, [People Function](#) (Human Resources) or the [Business Integrity Team](#) about your situation, or report it to the [Ethics Hotline](#).

Q I just started working at KBR, and overall, I'm very excited. Unfortunately, one of my colleagues has made me very uncomfortable. At my first meeting I noticed that one colleague, named Landon, seemed to be staring at me. Later that day I received an email from him. In the email, he told me that he found my email address in the company directory because he thought I was beautiful. Apparently, he found my Instagram and Facebook pages as well, because I found friend requests from him in both accounts when I got home that evening. When I saw him the next day, I told him to stop messaging me. After that I noticed that I wasn't included in several meetings and that my work assignments had been reduced. I'm not sure if the work issues are related. What should I do?

A As KBR takes harassment and retaliation seriously, you should immediately discuss your situation with a manager or [People Function](#) (Human Resources), or report the matter to the [Business Integrity Team](#), [Legal Department](#) or [Ethics Hotline](#). The matter will be addressed and an inquiry will be conducted to determine if a violation of the Code or other KBR policy occurred.

We Embrace Inclusion and Diversity

We believe our individual differences and perspectives bring enhanced value to our teams and help us develop solutions for the most challenging problems. We understand that by embracing our differences and working together, we are more innovative, more resilient and safer. Our teams thrive when we are all empowered to share our voices. Diverse and inclusive perspectives improve our decisions and maintain our reputation as a great place to work. We will continue to attract talent and insight from all kinds of people. Ensuring that we all feel welcome to participate — no matter who we are — enhances our creativity and the value we deliver.

How We Embrace Inclusion and Diversity

- Always keep diversity in mind when building our teams
- Communicate clearly with all team members
- Actively seek and welcome diverse points of view to find solutions
- Listen to all points of view and perspectives
- Speak up if we feel our views or the views of others are not being respected



Learn More

[Stuart Bradie Signs CEO Action for Diversity and Inclusion Pledge | KBR](#)



Delivering with Integrity

- We Avoid Conflicts of Interest
- We Prevent Bribery and Corruption
- We Give and Receive Business Courtesies Responsibly
- We Conduct International Business and Trade with Integrity
- We Compete Fairly
- We Perform Honestly

We Avoid Conflicts of Interest

As a team of teams, we never place personal interests ahead of the best interests of KBR. We deliver the best solutions when we don't allow personal relationships or other interests to impair our decision-making. We are honest, ethical and transparent when handling actual or potential conflicts of interest. Even the appearance of a conflict of interest can create reputational risks to KBR and affect the morale of our workforce.

How We Avoid Conflicts of Interest

- Make decisions objectively and without favoritism
- Stay alert to situations, relationships or activities that could affect our objectivity
- Promptly disclose any potential conflicts of interest to a manager, the [Legal Department](#) or the [Business Integrity Team](#); transparency is the key with potential conflicts of interest
- Remove ourselves from decisions involving our own possible conflicts of interest
- Recuse ourselves from participating in hiring or doing business with a close relation
- Disclose financial interests that may conflict with KBR's interests
- Follow all reporting procedures unique to board members, the CEO and senior management, and employees who oversee use of KBR funds or assets
- Utilize processes to help the company avoid organizational conflicts of interest

Understanding Conflicts of Interest

A conflict of interest may arise when our personal associations or interests are not consistent with KBR's best interests, which can influence our objectivity. This can take many forms:

- Serving as director or consultant of a non-KBR entity
- Holding a financial interest in a potential competitor, customer or supplier
- Engaging in personal financial transactions with other employees, vendors or business partners
- Having a second job that conflicts with KBR's interests or limits job performance
- Hiring or supervising a close relative
- Conducting KBR business with a supplier who is a close relative
- Having a romantic relationship with a coworker, especially one who reports to you



People of Integrity

As people of integrity who value honesty, we know there is no need to hide a potential conflict of interest. Your manager, the [Legal Department](#) and the [Business Integrity Team](#) are all available to give guidance. Remember that even the appearance of a conflict of interest can harm our and your reputation. Always disclose potential conflicts and seek advice if you are unsure.

Choosing Integrity

Sometimes an opportunity can present a conflict of interest. The opportunity may be for you alone, or it may be for KBR. Consider the questions on the right to help decide if a conflict is likely to arise.

Delivering Answers

Q I've been an engineer at KBR for twelve years. My team just passed a major milestone, and I'd like to give them a reward. I think a team dinner would be just the thing. My brother owns a catering business and can cater for large groups. Can I talk to him about catering our dinner?

A No. This could create a conflict of interest. We cannot use our position at KBR to pursue business with a close family member, even if that family member's business does not compete with ours. You may discuss your situation with your manager or the [Legal Department](#). If you remove yourself from any decisions regarding your brother's business, KBR may consider using his catering services for future events.



Learn More

[Outside Business and Conflicts of Interest Form](#)

Click on a response to each of the questions below to help you decide if a possible conflict exists.

Does the personal opportunity involve a KBR supplier, competitor or business partner, or is it in the same type of business as KBR?

Would the personal opportunity diminish or impair your ability to perform your job duties at KBR?

Would the personal opportunity impair your ability to make objective business decisions on behalf of KBR or cause you to compete with KBR?

Is a family member involved in providing the opportunity to KBR?

Would you have trouble making an objective business decision on behalf of KBR, or would it appear to others that any decision was not objective?

We Prevent Bribery and Corruption

When building and maintaining business relationships, we always bring value with integrity. We prohibit giving or receiving bribes or improper payments under any circumstances. Corruption harms the communities where we do business and can lead to significant fines and even jail time. It can also damage our reputation. Regardless of custom or law, wherever we do business around the world, we never compromise our values. As we continue to evolve, our integrity will remain constant.

How We Prevent Bribery and Corruption

- Never make, offer, authorize or accept improper payments, including kickbacks, bribes or payoffs
- Exercise extra caution about improper payments when working with government employees
- Conduct appropriate risk-based due diligence on potential business partners, including government-owned entities, prior to engagement
- Never use a third party to make a payment we would not make ourselves
- Promptly report any concerns about possible improper payments
- Never make facilitating or expediting payments, which are payments to a government official or employee in order to expedite or secure the performance of a nondiscretionary routine government action
- Follow all KBR anti-corruption policies and procedures, particularly regarding approvals and documentation requirements for certain transactions



What Is a Bribe or Improper Payment?

A bribe or improper payment is directly or indirectly offering, giving or receiving money, gifts or anything of value to influence someone to do something that is improper, illegal, in violation of his or her duty, or to secure an improper advantage.

Bribes and improper payments can come in many forms and can include tangible items (gifts) and intangibles (promises) in addition to monetary exchanges. Improper payments can arise when dealing with foreign officials, with government contracts, or in commercial business. If you are wondering whether an improper payment may be involved, report your concern to a member of the [Legal Department](#) — including the [Anti-Corruption Compliance](#) and [Business Integrity Teams](#) — or the [Ethics Hotline](#).



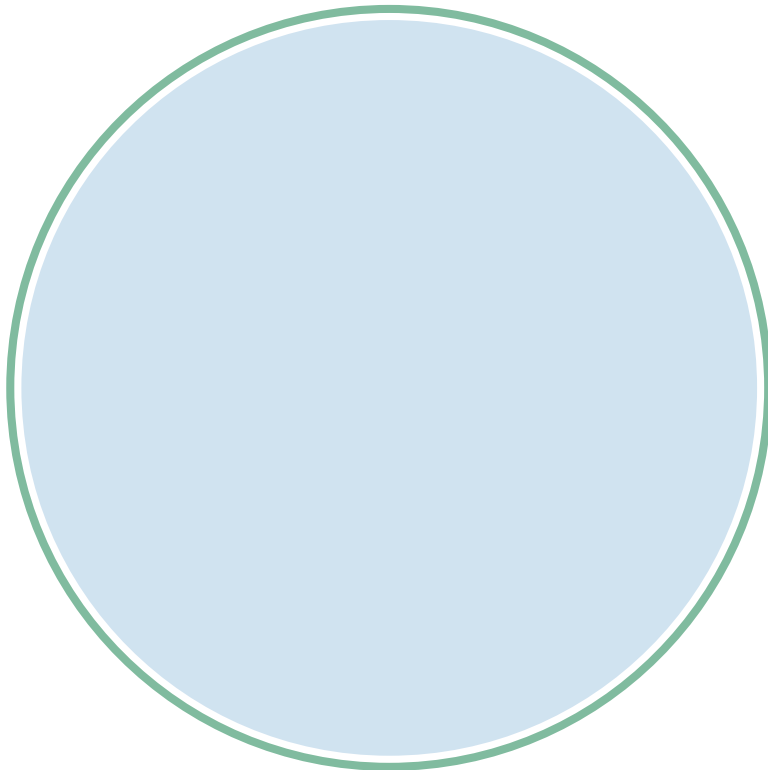
Learn More

[Anti-Corruption Compliance](#)

[Anti-Corruption Procedures](#)

Choosing Integrity

Click each circle to learn about different kinds of improper payments.



We Give and Receive Business Courtesies Responsibly

As trusted partners to our clients, we never give or receive gifts or other courtesies to influence a business decision. Even the appearance of influence can harm our reputation. Though we may at times share courtesies as a normal part of doing business and building relationships, we never allow these to affect our business judgment. Our success is built on the value we deliver through our people, our integrity and our innovative solutions. We never offer or accept inappropriate courtesies.

How We Give and Receive Business Courtesies Responsibly

- Never provide or accept extravagant or frequent courtesies (e.g., gifts, hospitality, travel or entertainment) to or from third parties
- Never give or accept cash or cash equivalents, including gift cards
- Never request courtesies from third parties
- Never accept courtesies from a supplier or potential supplier we are currently evaluating or with whom we are negotiating as this may give the appearance of impropriety
- Comply with KBR's Anti-Corruption Procedures, which specify the circumstances in which gifts, hospitality, travel or entertainment may be given or received, including when we may provide courtesies to public officials and government employees

Reasonable and Customary Courtesies

Reasonable and customary business meals, entertainment and gifts may be given or received as long as the gift or receipt does not create the appearance of impropriety and is in accordance with our procedures. All such activities must be reported, approved and expensed in accordance with our procedures. In the absence of a specific procedure, the courtesy should be reported to and approved in advance by a supervisor.

Delivering Answers

Q

I work in procurement. Am I allowed to accept a business lunch invitation from a supplier?

A

It depends. A business lunch is likely to be a reasonable and customary courtesy. However, given your role in procurement, where you have the ability to influence awards, you must take special care. Always get preapproval and follow procedures for reimbursement.

Legal requirements pertaining to business courtesies can be stricter on government contracts than commercial contracts. We must abide by those requirements when working on government contracts.

We Conduct International Business and Trade with Integrity

KBR applies high standards of integrity wherever we do business, all around the world. Conducting international business with integrity helps us as we strive to create a better and safer world. We never violate international trade laws, which include export and import laws, as well as sanctions and embargoes. These laws can vary depending on location, and we are responsible for knowing and following them. Failure to comply can lead to serious reputational harm, fines and even imprisonment.

How We Conduct International Business and Trade with Integrity

- Never pursue business across borders without first knowing the trade laws and regulations
- Comply with all trade laws and regulations
- Determine if sharing technical data with a foreign person will result in a deemed export
- Ensure that we have obtained any required export licenses, import licenses and other authorizations
- Comply with all U.S. anti-boycott regulations
- Comply with all sanctions and other trade restrictions imposed by the Office of Foreign Assets Control (OFAC) of the U.S. Department of the Treasury and the sanctioning government authorities of other nations
- Consult with the KBR Legal Department's International Trade Compliance Office (ITCO) for guidance on all trade-related matters
- Follow all KBR policies and procedures related to international trade



Learn More

[Export Compliance Manual](#)

[International Trade Compliance Office](#)

We Compete Fairly

We deliver solutions that help our customers around the world achieve their most critical objectives, and we win our business fairly. Open and fair competition pushes us to be our best, driving us to innovate. We never seek unfair advantages in the marketplace. Not only would this harm our relationships with our customers and business partners, but it could also lead to serious legal consequences.

How We Compete Fairly

- Comply with all applicable antitrust and competition laws
- Never discuss or enter into an agreement with a competitor regarding:
 - Prices
 - Terms of sale or service
 - Distribution
 - Territories
 - Customers
- Seek guidance from the KBR [Legal Department](#) before engaging in information exchanges with competitors through trade associations or industry meetings
- Never make false claims about competitors' products or services
- Promptly report to the KBR [Legal Department](#) any attempts by competitors to enter into an illegal agreement or any pricing or bid information we receive from a competitor



Delivering Answers

Q

I work in Business Development. At a recent trade show, I met up with a former coworker who now works for a competitor. She invited me to join a separate meeting with an industry group that wants to exchange business processes and performance metrics for benchmarking purposes. Should I attend the meeting?

A

Sharing KBR information with competitors may violate antitrust laws, even if the purpose is to establish industry benchmarks. Consult with the [Legal Department](#) before deciding to attend.

We Perform Honestly

We are not afraid to meet any challenges head-on, but we do so honestly. We build and maintain trust with our customers and business partners by representing KBR truthfully. As employees, we also have access to the assets that KBR has accumulated over its long history. We use these assets and resources for business purposes only. Any careless or fraudulent use of our assets undermines our ability to be at our best.

How We Perform Honestly

- Provide truthful details about our products and services in all marketing materials
- Never mislead or oversell when negotiating with customers and business partners
- Estimate all implementation timelines accurately, and communicate changes honestly
- Never disparage competitors when highlighting our solutions
- Use KBR assets, including funds, for business purposes only
- Never misappropriate KBR funds or other assets
- Report expenses and hours worked honestly and accurately

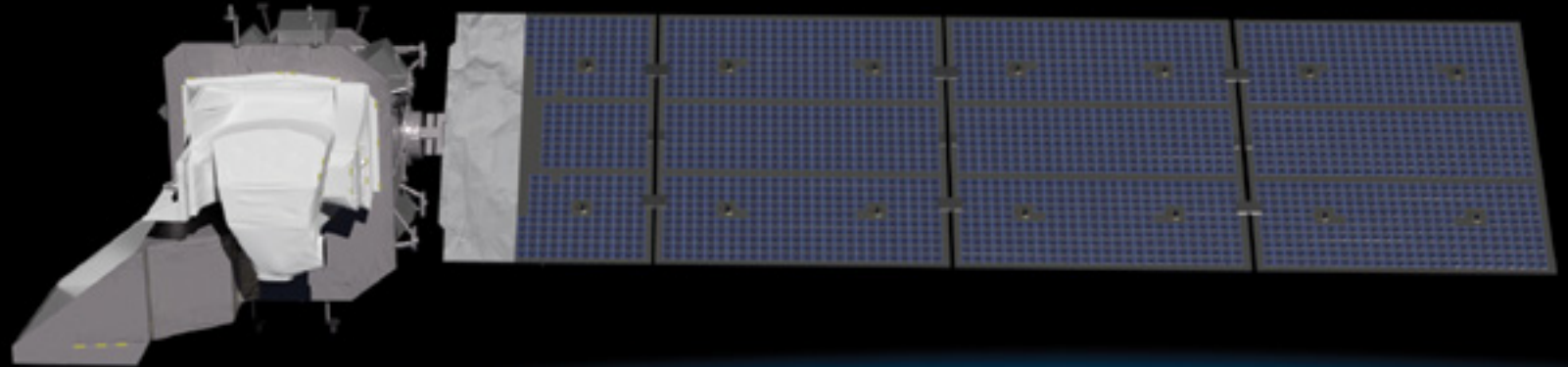
Delivering Answers

Q Over the years, I've become good friends with my sales supervisor, George. We went out together last weekend with our spouses and had a great time. I noticed, though, that George used his company credit card to pay for our meal. I asked him about it later, and he said not to worry. I still feel uncomfortable because I'm wondering whether that was an appropriate use of company funds. Was it?

A No. Your supervisor should not have used a company card to pay for a personal expense. Submitting false expenses is fraud and is prohibited by this Code. Because George is your supervisor, you should use the [Ethics Hotline](#) to report the issue.

Q As an engineer assigned to a research project, I always report my hours accurately and to the appropriate charge code. Recently, my manager asked me to report my hours to a different charge code, even though it appears to be for a project I didn't work on. I'm reluctant to report my hours to another project code. What should I do?

A You should seek clarification from your manager. Often there are several charge codes used for the same project, and the customer may prefer another charge code. However, if you suspect that you are being asked to report hours to a project that you are not working on, you should report the issue to a department/project head, [People Function](#) (Human Resources), the [Legal Department](#), the [Business Integrity Team](#) or the [Ethics Hotline](#).



Valuing Our Critical Assets

- We Protect Privacy and Personal Information
- We Safeguard Our Reputation
- We Protect Confidential and Proprietary Information
- We Prevent Insider Trading

We Protect Privacy and Personal Information

As a large, global company, we collect personal information from employees and clients in the course of doing business. When we protect our stakeholders' information and privacy rights, we show we value them. We also gain and maintain their trust, which is a cornerstone of our continued success. We protect personal information and the data that is critical to our growth. Our multilayer safeguards protect information assets and ensure the privacy and security of both personal and business information for all our stakeholders in accordance with applicable laws.

How We Protect Privacy and Personal Information

- Ensure only authorized users can access our information systems
- Provide employees with only the data access needed for their jobs
- Ensure that KBR data is only stored on secure, KBR-approved devices
- Never open questionable email attachments or hyperlinks
- Collect and secure only the personally identifiable information (PII) needed for business purposes
- Follow all privacy and data protection policies and procedures

Personal Information

Personal information can take many forms. Some examples include:

- Full name
- Social Security number
- Driver's license number
- Credit card number
- Home address
- Personal email address
- Personal phone number

Personal information includes single pieces of information that can identify a specific individual. However, other kinds of information, when combined, may also be personal information when used to identify a specific person. Some of these other kinds of information are:

- Date and place of birth
- Work or business phone number
- Medical information
- Education information
- Race and religion

Be aware of all these kinds of information and be sure to keep them secure.

Our Communications Infrastructure

KBR houses considerable data in its communications infrastructure, including personal information. Our computers, servers, mobile devices, software and other technologies help us achieve a wide variety of business objectives. When we protect this infrastructure, we are also protecting all the data it contains.

We keep all our communications systems safe and secure at all times. This means repairing or replacing devices that are out of date or damaged, applying all security-related updates, using strict password and other protections on- and off-site, and following all protocols for transferring and disposing of data.



Learn More

[Global Data Privacy Policy](#)
[Data Privacy and GDPR](#)

We Safeguard Our Reputation

Over the past hundred-plus years, KBR has built a reputation for innovative technology and solutions. To protect that reputation and our business relationships, we communicate as one team. Our stakeholders deserve truthful and consistent communications about KBR, and our designated spokespersons ensure we can provide that. In addition, we are always careful when mentioning KBR on social media.

How We Safeguard Our Reputation

- Direct outside inquiries to the appropriate personnel
- Never represent our personal views as those of KBR on social media or in any other communications
- Identify ourselves as KBR employees if endorsing our products or services
- Follow the Code and other company policies while using social media for business purposes or when commenting about the company when using personal or business accounts
- Follow KBR's Social Media Policy



Social Media Use

Social media is a powerful tool for direct communication, information gathering and connection building. We use social media to share our message and vision and to keep others updated on our innovations and contributions.

We also know that online communication can be both positive and negative. We are always careful of what we post about KBR. We are never inaccurate in what we post, nor do we share confidential information or otherwise use social media in a way that would violate KBR's Social Media Policy. In addition, social media should not interfere with our responsibilities at KBR. We never allow personal use of social media to distract us while on the job.



[Learn More
Social Media Policy](#)

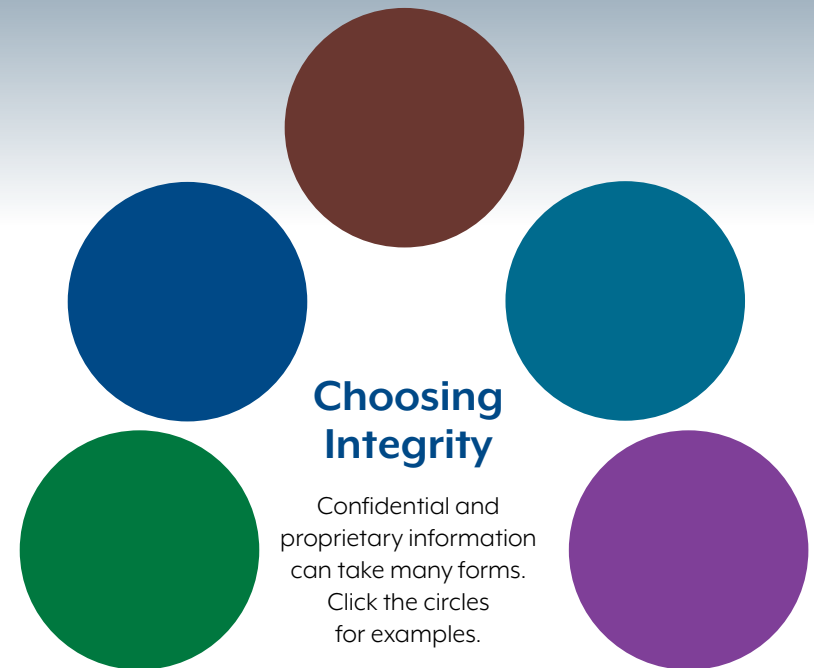
We Protect Confidential and Proprietary Information

Our confidential and proprietary information, including intellectual property (IP), sets us apart. We distinguish ourselves from our competitors through our groundbreaking solutions, and we must protect our hard-earned insights and innovations. These business assets will help us continue to serve our customers and business partners as we evolve.

As part of our employment at KBR, we may have access to confidential information of our own or of a business partner, including our clients' proprietary information. We are never careless with this information. Unauthorized sharing of confidential and proprietary information could harm KBR and its customers or aid our competitors.

How We Protect Confidential and Proprietary Information

- Never use KBR's or our business partners' confidential and proprietary information, except as authorized
- Never disclose KBR's confidential and proprietary information, or that of a business partner, without prior authorization
- Never take or use any of KBR's or our business partners' confidential or proprietary information when leaving KBR
- Never use confidential or proprietary information from previous jobs while working at KBR
- Follow all restrictions on KBR copyrights, patents and trademarks, as well as those of others
- Follow all licensing terms when using third-party assets such as business software
- Secure all documents, data and devices with effective locks and passwords
- Never discuss confidential information in public places, such as elevators and cafes
- Ensure that only authorized personnel can access workplaces, and escort all visitors
- Implement the proper safeguards when working outside of the office, including working from home
- Promptly report any data or security breaches



Learn More

[Critical Assets Management](#)

[Data/Document Classification and Management of Proprietary Information](#)

We Prevent Insider Trading

Our strategic business information is not always immediately available to the public. As a publicly traded company, we never use or share such material, nonpublic information for personal gain. Our business partners also trust us to safeguard their information, and we never betray that trust. Any form of insider trading, including “tipping” or sharing inside information, is illegal. Doing so would harm our reputation and could lead to severe legal penalties.

How We Prevent Insider Trading

- Never share inside information with anyone outside KBR, including family and friends
- Never buy or sell shares in KBR or any other company when we have inside nonpublic knowledge
- Only share inside information with employees who need to know for business purposes
- Never “tip” or share inside information with someone outside KBR who may use it to buy or sell securities
- Never attempt to manipulate the price of stock by spreading false information



Inside Information

Material, nonpublic information, or inside information, can come in many forms. Much nonpublic information will be made public eventually. It is “inside” information if the public does not yet know about it. Below are a few examples:

- Details of an upcoming merger or acquisition
- Special dividends
- Launch of a new product or nonpublic information about new projects
- KBR financial results
- Information about ongoing litigation
- Findings from an investigation or audit
- Material, nonpublic information about other companies, including our clients, that we may learn about from our roles at KBR



Delivering with Transparency

- We Work Ethically and Transparently with Government Customers
- We Work Ethically with Suppliers and Third Parties
- We Maintain Accurate Records and Accounts

We Work Ethically and Transparently with Government Customers

We are privileged to provide solutions to the U.S. government and other governments around the world. We understand that government work entails complying with special responsibilities and legal and ethical obligations, and we embrace them completely. Our high standards of integrity apply to all our customers, but we are especially careful to honor obligations paid for with public money. KBR complies with all applicable laws and regulations related to government contracts. Failure to comply with these laws and regulations could jeopardize current and future government contracts.

How We Work Ethically and Transparently with Government Customers

- Fully meet all our commitments
- Share transparently all aspects of a contract, including costs and schedules as required
- Properly manage contracts and provide adequate oversight for work performance
- Never offer anything of value to government officials or employees of state agencies in violation of the applicable laws and regulations
- Maintain and submit accurate and truthful records, including reporting work hours
- Never submit false claims, statements or misrepresentations to customers or on any government documents
- Participate in all required training related to government contracts
- Follow all government procurement laws, policies and procedures
- Ensure all KBR employees, vendors and contractors are aware of, and follow, KBR's Code of Business Conduct and Supplier Code of Conduct



Learn More

[Contractor Code of Business Ethics and Conduct Compliance Policy](#)



We Work Ethically with Suppliers and Third Parties

We deliver exceptional, sustainable value for all our stakeholders. To ensure we never compromise on this commitment, we work with suppliers and third parties who share our high standards. We always seek the best value when building and maintaining business relationships, without compromising our integrity. To protect our reputation for quality and integrity, we are both fair and rigorous when working with suppliers and third parties.

How We Work Ethically with Suppliers and Third Parties

- Treat all suppliers and third parties fairly, regardless of the business value of the relationship
- Seek suppliers and third parties who share our values as well as help us achieve business goals
- Select suppliers and third parties based on objective criteria, such as price, quality, availability and technical excellence
- Communicate openly and honestly to resolve business issues that may arise
- Ensure that our suppliers and third-party partners are ethical, follow the law and abide by our Supplier Code of Conduct



Learn More

[KBR Supplier Code of Conduct](#)

[Procurement and Supply Chain Management](#)

We Maintain Accurate Records and Accounts

Maintaining accurate records and accounts with integrity allows us to plan for the future and reassures our stakeholders. Strategic investments and decisions depend on carefully kept records and accounts, and so does complying with the law. As a publicly traded company, we are responsible for providing timely, accurate records for investors and government agencies in accordance with the laws and regulations of the countries in which we work.

How We Maintain Accurate Records and Accounts

- Maintain a system of internal accounting controls sufficient to provide reasonable assurance regarding the reliability of financial reporting
- Comply with generally accepted accounting principles, statutory requirements and all internal controls
- Maintain accounts, reports and receipts honestly and without exaggeration
- Ensure that all accounting records, including all payments, accurately and fairly reflect the transactions and disposition of the assets of the company
- Ensure that all transactions are authorized under our policies and procedures and are supported by documentation to verify the validity of the transaction
- Record all assets, liabilities, revenues and expenses completely and in a timely manner, particularly in relation to financial statements, reports and data prepared for or as part of internal, public and regulatory reporting
- Never set up funds or assets that are secret or unrecorded
- Report any concerns about inaccurate or misleading records to Internal Audit, the Chief Accounting Officer, the [Legal Department](#), the [Business Integrity Team](#), or the [Ethics Hotline](#)
- Follow all relevant laws and regulations, including the Sarbanes-Oxley Act, the Foreign Corrupt Practices Act and any applicable anti-corruption or anti-money laundering regulations



In addition to financial records, company records can take many forms. These include the following:

- Emails, letters, memoranda, social media posts, text messages and other forms of correspondence
- Policies and procedures
- Contracts
- Reports, analyses, formulas, schedules and presentations
- Personnel files

When managing our records, we follow our records retention schedule. Records are held for set periods of time to ensure access if needed. In addition, we comply with all legal holds on company records when required.



[Learn More](#)

[Content and Records Management Policy](#)



Valuing Our Communities

- We Are Building a Sustainable Future
- We Respect Human Rights
- We Engage with Our Communities



We Are Building a Sustainable Future

At KBR, sustainability is fundamental to all our activities. It guides our approach to supporting our communities, our people and our planet for future generations. We continually strive to develop innovative new technologies that benefit our planet. Our climate-positive, sustainable solutions, such as our plastics recycling technology, are helping create circular economies and allow us to help our clients meet their sustainability objectives. Every project and business activity serves as an opportunity to combat climate change and to protect and regenerate the environment.

How We Build a Sustainable Future

- Commit to science-based target initiatives for reducing greenhouse gas (GHG) emissions
- Participate in the United Nations Global Compact
- Minimize negative impacts to the environment while supporting regeneration
- Embed environmental and social pillars into the heart of KBR's culture



Learn More

[Global Sustainability Policy](#)

[Global Environmental Policy](#)

[KBR Sustainability Pillar Commitments](#)

[KBR Zero Harm](#)

[KBR Sustainability](#)



We Respect Human Rights

As a global company, KBR respects and upholds the highest human rights standards and does not tolerate any form of human rights violation. We recognize that human trafficking, modern slavery and child labor are heinous crimes. With thousands of suppliers in hundreds of countries, we take steps to ensure that human rights are respected wherever we do business. Valuing people means protecting human dignity in all our communities.

How We Respect Human Rights

- Ensure that all KBR employees receive fair and proper hours and compensation for work in safe conditions
- Conduct due diligence to ensure suppliers and third parties are committed to fair labor standards and human rights
- Never use child or forced labor anywhere in the world
- Only use reputable third-party employment and recruitment agencies
- Promptly report potential human rights violations to the [Ethics Hotline](#), the [Business Integrity Team](#) or the [Legal Department](#)
- Follow all applicable laws, policies and procedures, and go above and beyond to protect human dignity



Learn More

[Global Human Rights Policy](#)

[Trafficking in Persons Policy](#)

We Engage with Our Communities

At KBR, we believe it is our responsibility to be a positive force for change in the world. We have a duty to create social value and contribute to the well-being of the communities where we live and work. In pursuing our mission, we have always sought to create a better, safer world for all.

How We Engage with Our Communities

- Volunteer and participate in charitable activities
- Strive to make a lasting positive impact with local communities where we work through collaboration, consultation and communication
- Adhere to our Anti-Corruption Procedures when donating funds or making contributions in KBR's name
- Manage community engagement efforts such that they align with our ethics and work responsibilities

Giving Back

Since 2007, KBR has contributed nearly \$20 million to benefit charitable causes around the world. Our people have donated clothing and school supplies to underprivileged children, raised thousands of dollars for Christmas presents for those in need, and helped to clean up waterways and beaches around the world. These are just a few examples of the many ways our people are the heart of everything we do.

Participating in Politics

We all have a right to participate in the political process. An open political system makes for a fairer society. When participating in politics, we:

- Always comply with applicable laws regarding political influence and campaign contributions
- Always make clear that our views are not those of KBR
- Never allow our political activities to interfere with our work responsibilities
- Never pressure coworkers to join our political causes
- Never make political contributions on behalf of KBR without prior approval



Resources and Reporting

Resources and Reporting

As ONE KBR, we are unified in our shared purpose: to safely deliver any project, any time, in any environment for the benefit of our customers, shareholders, employees and the communities we serve. Our Code empowers us with the guidelines we need to pursue success with integrity. For more information or guidance, consult the resources below.

General Resources

- [Business Integrity Team](#)
- [Legal Department](#)
- [Audit Services](#)
- [People Function](#) (Human Resources)
- [Health, Safety, Security and Environment](#)
- [Corporate Sustainability](#)



Reporting Resources

- Ethics Hotline
 - Web:
 - www.ethics.kbr.com
 - Call:
 - United States: (800) 461-9330
 - United Kingdom: 0808 189 1053
 - For telephone numbers in all other countries, consult www.ethics.kbr.com
 - Text "Report" to 832-479-1340 (Available in the U.S. only)
- Email
 - FHOUKBR – CODE
 - fhoukbrcode@kbr.com
- Mail
 - Director of Business Integrity, KBR, Inc.
 - P.O. Box 2464, Houston, TX 77252-2464 USA





Delivering Solutions, Changing the World.SM