



**UK MODERN SLAVERY ACT STATEMENT**  
**(filed by Kellogg Brown & Root Limited)**

**OUR BUSINESS AND OPERATIONS**

KBR, Inc. and its subsidiaries (“KBR”) deliver science, technology and engineering solutions to governments and companies around the world. KBR employs approximately 34,000 people performing diverse, complex and mission critical roles in over 30 countries.

KBR is proud to work with its customers across the globe to provide technology, value-added services, and long-term operations and maintenance services, to ensure consistent delivery with predictable results. At KBR, We Deliver.

KBR’s capabilities and offerings include the following:

- Scientific research such as quantum science and computing; health and human performance; materials science; life science research; and earth sciences;
- Defence systems engineering such as rapid prototyping; test and evaluation; aerospace acquisition support; systems and platform integration; and sustainment engineering;
- Operational support such as space domain awareness; command, control and communications; human spaceflight and satellite operations; integrated supply chain and logistics; and military aviation support; and
- Information operations such as data analytics; mission planning systems; and artificial intelligence and machine learning; and
- Technology such as licensing of proprietary industrial process technology; advisory services focused on energy transition; and digitally-enabled asset optimisation solutions.

KBR provides these and other services to a diverse customer base, including domestic and foreign governments, international and national integrated energy companies and industrial companies.

Table 1.1 is a depiction of where KBR conducted business operations as at December 2023



## About KBR

We deliver science, technology and engineering solutions to governments and companies around the world. KBR employs approximately 34,000 people performing diverse, complex and mission-critical roles in over 30 countries.

With a full portfolio of services, proprietary technologies and expertise, our employees are ready to handle projects and missions from planning and design to sustainability and maintenance. Whether at the bottom of the ocean or in outer space, our clients trust us to deliver the impossible on a daily basis.

- KBR Operations and Joint Ventures
- KBR Corporate Headquarters – Houston, Texas



**34,000**  
**EMPLOYEES**

+ 9,000  
unconsolidated  
joint venture  
employees

At the end of 2023



**\$7.0B**  
**REVENUE**

in 2023



**CUSTOMERS**  
in more than

**80**  
**COUNTRIES**



**OPERATIONS**  
in more than

**30**  
**COUNTRIES**

### Our Global Footprint

KBR is proud to work with its customers across the globe to provide technology, value-added services, and long-term operations and maintenance services to ensure consistent delivery with predictable results. At KBR, We Deliver. The map above shows our office and project locations at the end of 2023.



KBR, Inc. is listed on the NYSE and is headquartered in Houston, Texas. KBR operates several wholly owned subsidiaries including Kellogg Brown & Root Limited (“KBRL”), which is based in Leatherhead, UK.

## OUR SUPPLY CHAIN

KBR has over 5,000 vendors/suppliers globally.

KBR, through its subsidiaries and joint ventures, provides direct and indirect engagement to its customers of labour, goods, and services. KBR’s indirect engagement consists of KBR subcontractors providing the labour, goods, and services to KBR and/or their customers.

KBR has a wide variety of global supply chains that are dependent on the type of project, KBR’s role in the project, and the project’s geographic location. KBR takes a risk-based approach to assessing human rights vulnerabilities in its supply chain, both during the onboarding process and throughout the project cycle. Certain subcontractors and lower tier subcontractors in high-risk countries are the focus of enhanced due diligence efforts to mitigate risks regarding human rights abuses.

The treatment of foreign and/or low-skilled employees working for KBR subcontractors in host countries is a particular area of focus for KBR and is addressed through its Combatting Trafficking in Persons (**CTIPS**) and Modern Slavery Act (**MSA**) programmes.

## OUR ACTIONS

- KBR acknowledges its corporate responsibility to respect human rights as delineated in the United Nations Guiding Principles on Business and Human Rights. KBR has adopted Human Rights as part of its Governance Corporate Pillar in its sustainability platform. KBR further recognises that modern slavery is a heinous crime that affects communities and individuals across the globe.
- KBR has existing policies and procedures in relation to Human Rights that include acknowledgement of the principles contained in the United Nations Universal Declaration of Human Rights. KBR’s [Global Human Rights policy](#), sets forth the commitment to ensure its operations and supply chain are free from modern slavery, human trafficking and forced labor, and its commitment that the Company, its subsidiaries, its employees, suppliers, and its partners will comply with all applicable laws.
- KBR is committed to the fair treatment and protection of migrant workers in accordance with the Dhaka Principles for Migration with Dignity. Furthermore, KBR expects its subcontractors, suppliers and business partners to enact and enforce similar migrant worker policies and protections.
- KBR’s [Code of Business Conduct](#), revised in April 2023, recognises promoting human rights as its corporate responsibility and expects and requires all of its employees to adhere to the Code of Business Conduct. All employees are required to complete annual ethics training, which



includes training regarding human trafficking.

- KBR has established an ethics hotline, where employees and others can report suspected inappropriate or unethical behaviour or human rights abuses, misconduct or violations of our Code of Business Conduct. KBR engages a third-party vendor to manage the ethics hotline, which permits reporters to maintain their anonymity.
- KBR's legal department (through its Business Integrity Team) promptly and thoroughly investigates any report that may include indications of human rights abuses and contacts the appropriate authorities when appropriate.
- KBR's Sustainable Supply Chain Charter sets out the standards and goals to be adopted in the procurement of all goods, services and materials across all KBR activities. This includes commitments in respect of Human Rights and Labor Practices, that align to KBR's Sustainable Procurement Policy and its Supplier Code of Conduct.
- KBR's Supplier Code of Conduct affirms that KBR has zero tolerance for child or forced labour and trafficking in persons and requires suppliers to adhere to these principles.
- KBR conducts CTIPS/MSA audits/inspections of certain key subcontractors that include interviews and surveys of subcontractor employees, housing inspections, and prevailing wage reviews.
- KBR conducts restricted party screening on subcontractors and vendors to ensure KBR is not doing business with any entities that are flagged for designated human rights abuses or subject to other watch-lists/sanctions.
- During 2023, KBR delivered its online training programme to 50 'Tier 1' suppliers across its non-US businesses to raise awareness in identifying and combatting modern slavery in the supply chain.. This is the third consecutive year that KBR has offered modern slavery training across its non-US businesses, with 54% of targeted suppliers completing the training over that period.
- A desktop audit was then conducted on the identified 50 suppliers and subcontractors who specifically work with KBR in Tier 1, Tier 2, Tier 2 Watchlist, Tier 3 and Special Case countries (according to the US Department of State). Since its inception in 2020, 44% of targeted suppliers have now been audited.
- During 2023, KBR conducted 68 full in-person CTIPS interviews at project sites operated by KBR's Government Solutions International business, in seven countries across Europe, the Middle East and Africa. Interviews were carried out at all different levels of the workforce from site management to chefs and cleaners. The outcome of these site audits has ensured that KBR's overseas suppliers are compliant with the organisation's rigorous standards.

#### **OUR COMMITMENT (2024-2025)**

KBR is undertaking further steps to improve our oversight of our own project sites, our supply chains and our subcontractors, to ensure workers are not being abused or exploited; and to monitor and (where necessary) reassess risks. In respect of the activities conducted by the entities listed in the Schedule to this statement (and the supply chain serving those entities), KBR:



- will continue implementing its strategic plan for conducting physical subcontractor and project site CTIPS/MSA inspections that include checks of housing, passports, and treatment of their employees through random interviews - without subcontract management present. As part of these interviews, employees are asked a series of questions specific to the recruiting process in order to determine if any potential CTIPS/MSA violations have occurred;
- aims to conduct at least 20 further in-person inspections at project sites within Europe, the Middle East and Africa;
- is in the process of aligning suppliers' contractual conditions with the international guidance standard, ISO 20400, ensuring KBR maintains robust ethical and responsible procurement practices;.
- will continue to implement the rollout of its online modern slavery training programme;
- as a result of issues highlighted during previous inspections, is in the process of producing a detailed modern slavery audit guide for staff, when conducting future in-person CTIPS interviews;
- is continually reviewing and, where necessary, updating our processes for appointing potential supply chain providers;
- is conducting further internal reviews to ensure that our systems contain appropriate processes to protect lesser skilled workers engaged in overseas locations;
- is providing and updating ongoing training materials to be given to all employees and certain key suppliers about modern slavery and trafficking in people, and referring them to our ethics hotline to report any concerns;
- is identifying further suppliers and subcontractors that should be audited; and
- will continue to implement its key performance indicators to measure our progress in tackling modern slavery both internally and throughout our supply chain.

With KBR's operations and supply chains located in some high-risk countries and environments, the organisation and its leadership is fully aware of the challenges faced in such circumstances. As a result, the company takes a pro-active stance with educating subcontractors and suppliers operating within these regions, in order to mitigate risk. KBR focusses its efforts on training and auditing of modern slavery in the supply chain to ensure that its importance is embedded and aligned with our global policies and practices. As our approach to modern slavery auditing matures, KBR will seek enhancements to further automate and digitise supplier engagement in this regard.

From 2024-25, Modern Slavery Act compliance will reside under the umbrella of Global Sustainability, as one of KBR's Environmental, Social and Governance (ESG) focus areas. KBR's Corporate Sustainability team directs the development and implementation of its modern slavery prevention strategy working with each of the group's business areas, aligning with the principles of accountability, good stewardship and integrity.



This statement constitutes KBRL's U.K. Modern Slavery Act Statement for the year to the end of December 2023, having been agreed by the Board of Directors of KBRL on 4 June 2024. It is made in accordance with Section 54(1) of the UK Modern Slavery Act 2015 and is submitted on behalf of the entities listed in the Schedule to this statement.

Signed:  \_\_\_\_\_

Dated: 4<sup>th</sup> June 2024

Name: Paul Kahn

Director

Kellogg Brown & Root Limited



## **Schedule**

### **Entities Covered by this Statement**

1. Kellogg Brown & Root Limited
2. Aspire Defence Services Limited
3. KBR (Aspire Services) Limited
4. KBR (Aspire Services Ventures) Limited
5. Kellogg Brown & Root (U.K.) Limited
6. Kellogg Brown & Root Holdings Limited
7. Overseas Supply Services Limited
8. Technical Staffing Resources Limited
9. Frazer-Nash Consultancy Limited