COMPLIANCE AND ETHICS



Frequently Asked Questions

What is the Fluor Compliance and Ethics Integrity Portal & Hotline?

The Fluor Compliance and Ethics Integrity Portal and Hotline is an additional resource that employees can use to ask for guidance or report concerns related to the <u>Fluor's Code of Business Conduct and Ethics (Code)</u>, company procedures and policies, laws and other ethical business practices. For confidentiality, the Integrity Portal is administered by Convercent/OneTrust, an independent third-party vendor.

How can I ask for guidance or make a report?

Fluor's Compliance and Ethics Integrity Portal & Hotline is available 24 hours a day, seven days a week. Reports may be made via the internet (web line) or by telephone in more than 150 languages. Refer to the website for country specific toll-free phone numbers.

What type of situations should I report?

The Portal is designed for employees to report any known or suspected violations of our <u>Code</u>, company policy, law, or other concerns you may have. Even if you are not sure, we would rather you report a situation that turns out to be harmless than possibly let unethical behavior go unchecked because you were unsure.

I have a question / need clarification regarding a policy or the Code of Business Conduct and Ethics, what should I do?

If you are unsure, ask. The 'Ask a Question' feature allows you to be proactive and ask questions confidentially. We do not expect you to be an expert on the <u>Code</u>, or conduct your own investigation, the Portal offers you the ability to seek guidance from company experts when you are not sure.

What happens when I contact the Fluor Compliance and Ethics Integrity Portal & Hotline?

For Portal calls, the Convercent call center answers the call and transcribes the information you report. Caller ID is never used and there will be no effort to trace your call. You may report anonymously where local law permits. However, keep in mind that the more information you provide, the easier it will be for the company to investigate and appropriately respond to your report.

Reports submitted online are entered directly into Convercent's secure server.



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If you want to obtain information on the status of your report, you MUST save and remember the unique access number and password that you will be asked to create. This will allow you to respond to questions from the investigator and to follow the progress of the investigation into your concerns. Even if you report anonymously, you can still communicate with the investigator through the Portal. You should follow up at least every two weeks on your report until the investigation is complete.

How are reports handled at Fluor? Where do these reports go? Who can access them?

Once a report is received, Convercent provides the information only to specific individuals within the company who are charged with evaluating the report, based on the type of violation and location of the incident.

Fluor investigates all portal reports and is committed to maintaining confidentiality to the maximum extent possible. The company will disclose the information you provide only on a need-to-know basis and as required by law. Further information on how Fluor handles portal reports can be found in HR 705 and HR 705 EU.



What if I remember something important about the incident after I file the report?

When you file a report, whether using the Internet (web line) or telephone, you will receive a unique access number and be asked to select a password. With the access number and password, you can return to the Portal again, either by Internet (web line) or telephone to access the original report, view current status or provide follow-up information.

What if I am concerned about retaliation?

Fluor will not tolerate any form of direct or indirect retaliation that arises from raising concerns related to violations of our <u>Code</u>, policies, laws, regulations or other unethical conduct. If a report is made in good faith, you will be protected no matter the outcome of the investigation of that concern. If you suspect you are experiencing retaliation, you should contact Human Resources, Compliance and Ethics (<u>ethics@fluor.com</u>) or Fluor's Compliance and Ethics Integrity Portal & Hotline. Retaliating against someone who makes a report in good faith can result in prompt and strong disciplinary action, up to and including termination.



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Is there anyone I can contact internally with a concern?

In addition to the portal option, you can also reach out to the below resources when you have a concern:

- Compliance & Ethics team (<u>ethics@fluor.com</u>)
- Supervisor or your supervisor's supervisor (and up the reporting structure as necessary)
- Local Human Resources or Employee Relations manager
- Industrial Relations manager
- A Fluor Subject Matter Expert

