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Corporate Policy

Process Owner: EVP, General Counsel

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Trafficking in Persons

Date: June 29, 2015

Reference No: P-GL-KBR-LL-1011

PURPOSE:

The United States ("U.S.") Government has a zero-tolerance policy relating to trafficking in persons related behavior and the purpose of this Policy is to implement such U. S. Government policy.

SCOPE:

This policy applies to all employees, subcontractors and subcontractor employees of KBR, its subsidiaries and affiliated companies worldwide.

POLICY:

Background

Trafficking in persons, forced labor, and commercial sex are contrary to traditional values of dignity and respect and are illegal in many countries where KBR conducts its business. If an employee or representative of the company engages in said illegal behavior, such actions are contrary to KBR's Code of Business Conduct.

KBR has adopted a zero-tolerance policy regarding KBR employees, KBR Subcontractors and Subcontractor's employees that engage in or support Severe Forms of Trafficking in Persons, procurement of Commercial Sex Acts, or use of forced labor.

Failure to comply with this policy will result in disciplinary action up to or including removal from the host country assignment location or termination of employment. In addition, conduct that involves Trafficking in Persons may also violate (a) host country Government laws and regulations relating to Severe Forms of Trafficking in Persons, procurement of Commercial Sex Acts, and use of forced labor, and (b) United States laws and regulations on Severe Forms of Trafficking in Persons, procurement of Commercial Sex Acts, and use of forced labor which may apply to its employees' conduct in the host nation, including those laws for which jurisdiction is established by the Military Extraterritorial Jurisdiction Act of 2000 (18 U.S.C. 3261-3267 and 18 U.S.C. 3271 Trafficking in Persons Offenses Committed by Persons Employed by or Accompanying the Federal Government Outside the United States).

ROLES AND RESPONSIBILITIES:

KBR employees, KBR subcontractors or subcontractors' employees within the scope of their employment or contract relationship with KBR or in connection with or during the performance of a U.S. Government contract will not:

- Engage in or promote Severe Forms of Trafficking, which means (i) Sex Trafficking in which a Commercial Sex Act is induced by force, fraud, or Coercion, or in which the person induced to perform such act has not attained 18 years of age, or (ii) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or Coercion for the purpose of subjection to Involuntary Servitude, peonage, Debt Bondage, or slavery.
- Engage in Commercial Sex Acts, which means any sex act where anything of value is given to or received by any person.
- Use, engage in, or promote forced labor, which includes the use of Coercion:
 1. Threats of serious harm to or physical restraint against any person;
 2. Any scheme, plan, or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person;
 3. The abuse or threatened abuse of the legal process; or
 4. Debt bondage, which is the status or condition of a debtor arising from a pledge by the debtor of his or her personal services or of those of a person under his or her control as a security for a debt, if the value of those services as reasonably assessed is not applied toward the liquidation of the debt or the length and nature of those services are not respectively limited and defined.

When informed of or witness to a violation of this policy, or when in doubt about the propriety of a particular course of action, employees are encouraged to contact their supervisor or, if contact with their supervisor is not feasible, contact the KBR Ethics Hotline, the Law Department or any other person identified in the Code of Business Conduct for advice and assistance. Calls can be made to the KBR Ethics Hotline every day, 24 hours a day. You may contact the Company in one of the following ways:

www.kbr.ethicspoint.com

Call 855.219.7328 in the US or Canada
(toll-free phone numbers for all other countries can be found on the website)

E-mail fhokbrcode@kbr.com

Mail the Director of Business Conduct at:
P.O. Box 2464
Houston, TX 77252-2464, USA

KBR subcontractors and the subcontractor's employees will not engage in or support severe forms of trafficking in persons, procure commercial sex acts, or use forced labor during the performance of all contracts. The Subcontractor will communicate the zero-tolerance policy to its employees as well as its enforcement.

DEFINITIONS:

Coercion means (i) threats or serious harm to or physical restraint against any person, (ii) any scheme, plan, or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person, or (iii) the abuse or threatened abuse of the legal process.

Commercial Sex Act means any sex act where anything of value is given to or received by any person.

Debt Bondage means the status or condition of a debtor arising from a pledge by the debtor of his or her personal services or of those of a person under his or her control as a security for debit, if the value of those services as reasonably assessed is not applied toward the liquidation of the debt or the length and nature of those services are not respectively limited and defined.

Involuntary Servitude means a condition of servitude induced by means of (i) any scheme, plan, or pattern intended to cause a person to believe that, if the person did not enter into or continue in such conditions, that person or another person would suffer serious harm or physical restraint, or (ii) the abuse or threatened abuse of the legal process.

Severe Forms of Trafficking means (i) sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age, or (ii) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or Coercion for the purpose of subjection to Involuntary Servitude, peonage, Debt Bondage, or slavery.

Sex Trafficking means the recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of a commercial sex act.

REFERENCES:

Code of Federal Regulations, 48 CFR 52.222-50 Combating Trafficking in Persons

[KBR's Code of Business Conduct](#)

APPROVED BY: CEO

DATE: June 29, 2015

SUPERSEDES: P-GL-KBR-HR-3810 Trafficking in Persons