



CB&I is committed to ensuring that our business and our supply chains do not involve forced labor or human trafficking. CB&I's Code of Conduct, CB&I's Third Party Expectations Statement, and CB&I's Supply Chain Policy Declaration reflect our commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to ensure forced labor and human trafficking does not take place in our supply chains.

#### **OUR BUSINESS**

CB&I is a leading global provider of technology and infrastructure for the energy industry. With over 125 years of experience and the expertise of over 40,000 employees, CB&I provides reliable solutions to our customers around the world while maintaining a focus on safety and an uncompromising standard of quality. Our business is organized into four units operating worldwide: Engineering and Construction, Fabrication Services, Capital Services and Technology.

#### **STAFF RECRUITMENT**

Our recruitment processes are transparent and reviewed regularly. We communicate directly with candidates to discuss job opportunities and confirm the details of any offer made. We have robust procedures in place for vetting new employees, confirming their identities, and that wherever possible they are paid directly into an appropriate, personal bank account.

#### **SUPPLIER AND SUBCONTRACTOR ADHERENCE TO OUR CODE OF CONDUCT AND VALUES**

Our Code of Conduct and Third Party Expectations state CB&I's zero tolerance for slavery and human trafficking. To ensure our Suppliers and Subcontractors comply with CB&I's values, we have in place a comprehensive program, comprising:

- Pre-qualification and annual re-registration on CB&I procurement and subcontracts portal.
- Acceptance of and agreement to comply with CB&I's Code of Conduct.
- Agreement not to use forced labor and not to engage in or facilitate human trafficking.
- Provisions in Subcontracts and Purchase Orders requiring compliance with human rights obligations and our Third Party Expectations statement.

We also have systems in place to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking from occurring in our supply chains.
- Conduct audits of Suppliers and Subcontractors including confirmation of compliance with CB&I's Code of Conduct and Third Party Expectations.
- Allow any person to anonymously report via a confidential Ethics telephone hotline any suspected misconduct or violations of our Code of Conduct.
- Non-retaliation policies to protect whistle blowers and other persons engaged in reporting suspected misconduct or violations of our Code of Conduct.

#### **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide targeted training to our staff engaged in procuring goods or services. In addition, when hired each employee is trained on CB&I's Code of Conduct and Code of Ethics.

All employees are informed of the CB&I Ethics Hotline via training supplemented by awareness posters and handouts. We conduct annual refresher training for all employees in a position to have knowledge or awareness of suspected misconduct or violations of CB&I's Code of Conduct and Code of Ethics.

A handwritten signature in black ink that reads "Patrick K. Mullen". The signature is written in a cursive style and is positioned above a horizontal line.

Patrick K. Mullen  
Chief Operating Officer, CB&I

6/27/2017  
Date