Fluor Code of Business Conduct and Ethics
Doing What Is Right

Tips:

No person or document can tell you what is right or wrong in every business situation. If you are ever in doubt, ask yourself:

- Is this legal? Have I checked with the company’s subject matter expert? (See list of Fluor Company Experts on page 29.)
- Would it conflict with any of Fluor’s core values: safety, integrity, teamwork or excellence?
- Am I involving the right people?
- How would I feel telling my family or children about my decision?
- If I choose to act on this situation, would my decision be fair?
- How would I feel reading about my choice in a newspaper, or explaining my choice to a judge or jury?

And remember:

- If you know it’s wrong, don’t do it.
- If in doubt, ASK.
- Keep asking until you get an answer.
- Don’t ignore what you believe to be illegal or unethical conduct.
- Set an example for others.
- Take responsibility for DOING THE RIGHT THING. For managers, this includes taking responsibility for having the proper and necessary policies, procedures and an environment to DO THE RIGHT THING.
Dear Employees:

Our employees have always delivered strong results and behaved ethically. This new Code of Business Conduct and Ethics reflects our continuing and absolute determination to do the right thing, recognizing that this is a huge challenge in today’s complex global business environment. We have many different business lines, a diverse workforce and projects throughout the world. Our clients, suppliers and partners are small and large, private sector and government, domestic and international. This diversity creates many challenges for us as we carry out our unyielding commitment to conduct our business responsibly, ethically and legally.

This Code serves as a resource for all employees. It cannot answer every question about proper business conduct but it should at least point you in the right direction. You will never lose your bearings if you remember and follow Fluor’s core values:

- **Safety**: “We hold sacred the well-being of people—employees, clients and communities in which we work and live.”
- **Integrity**: “We live by the highest ethical standards.”
- **Teamwork**: “We respect each other’s perspectives and share knowledge and resources to achieve excellence, deliver value, and grow individually and collectively.”
- **Excellence**: “We deliver quality services of unmatched value, constantly raising the bar on our performance.”

The standards established in this Code are not new. The Code summarizes, clarifies and sometimes updates our existing standards for employee conduct so that we can all act consistently within the framework of our vision and values.

While we operate in many different countries and business climates, we must always set and work within our high standards. Follow this Code of Conduct. If you are ever unsure about the proper course of action, get guidance from your supervisor, management, Human Resources, a Fluor subject matter expert or by calling the Compliance and Ethics Hotline. Our success depends on it.

Sincerely,

Alan Boeckmann  
Chairman and Chief Executive Officer  
Fluor Corporation
# Table of Contents

## About the Code

- Why Do We Have a Code of Business Conduct and Ethics? .................................................. 1
- To Whom Does the Code Apply? ......................................................................................... 1
- What Am I Responsible for Under the Code? ...................................................................... 1
- What Are Managers Responsible for Under the Code? ......................................................... 1
- What Is the Code and Are There Other Resources Besides the Code? ............................... 2
- Updates and Revisions to the Code ...................................................................................... 2
- What About When Laws Are Different in Other Countries? ................................................ 2

## Getting Help and Reporting Suspected Problems

- Whom Should I Contact with a Question or Concern Related to the Code? ...................... 3
- What Happens When I Call the Fluor Compliance and Ethics Hotline? ............................ 3
- What If I Am Retaliated Against for Using the Compliance and Ethics Hotline or Otherwise Reporting a Problem? ................................................................. 4
- Consequences of Violating the Code and Not Reporting ...................................................... 4

## Health, Safety and Environmental Protection (HSE)

- Our Commitment to Safety and Security ............................................................................. 6
- Global Standards and Local Policies ..................................................................................... 6
- Protecting the Environment ................................................................................................. 6
- Drugs and Alcohol in the Workplace .................................................................................... 6
- Weapons and Violence in the Workplace ............................................................................. 7

## Treating Employees Fairly

- Fair Employment Practices ................................................................................................. 8
- Workplace Harassment ......................................................................................................... 8
- Protecting Confidential Employee Information ................................................................... 8
- Background Checks ............................................................................................................ 9

## Financial Controls

- Accurate, Full and Fair Disclosure ....................................................................................... 10
- Pressure to Meet the Numbers ............................................................................................. 10
- Discussing Financial Information and Results .................................................................... 11
- Insider Trading .................................................................................................................... 11
- When Can I Trade? ............................................................................................................. 12

## Conflicts of Interest, Gifts, Entertainment and Business Courtesies

- Conflicts of Interest ............................................................................................................. 13
- Gifts, Entertainment and Business Courtesies .................................................................... 14
Why Do We Have a Code of Business Conduct and Ethics?

Fluor’s success depends on our reputation, performance and how we treat others—employees, clients, suppliers, competitors, governments and communities. While business practices and customs vary by culture and geography, Fluor’s management has established the high standards that we must live up to, in all parts of the world at all times, in order to be successful in how we do business.

This Code is the centerpiece of Fluor’s guidance on ethical business conduct and is derived from and supports other company policies and procedures—all of which help ensure appropriate business conduct.

To Whom Does the Code Apply?

All employees and officers of Fluor and its subsidiaries worldwide must adhere to the standards set forth in this Code. Fluor must only select subcontractors, workers, consultants, agents, suppliers and other third-party providers who act in a manner consistent with the standards contained in this Code.

What Am I Responsible for Under the Code?

As an employee of Fluor or one of its subsidiaries, you are required to:

- Understand and follow the laws and regulations that apply to your job
- Read, understand and follow this Code
- Seek guidance from your supervisor or other Fluor resource if you are uncertain about the proper way to act on behalf of the company
- Participate in any compliance training required by the company
- Report any suspected violations of the law or the Code to your supervisor, Human Resources or the Compliance and Ethics Hotline

Remember: If in doubt, ASK.

What Are Managers Responsible for Under the Code?

As a manager, you have additional responsibilities related to the Code and Fluor’s Compliance and Ethics Program. First, set a good example by “walking the talk”—not just “talking the talk”—and living up to the standards of the Code yourself. You also must monitor those you supervise and require that they understand the Code standards and have the knowledge, skills and resources to abide by these standards. Be supportive of those who raise a concern or report a suspected problem and never retaliate against someone for doing so in good faith, even if it means they went “outside the chain of command.” In summary, as a manager you must:

- Create and support a culture of compliance and integrity; monitor those you supervise to see that they are following the Code
• For those you supervise, provide the tools and training necessary to follow the Code
• Support those who have reported in good faith and NEVER retaliate

What Is the Code and Are There Other Resources Besides the Code?

The Code is the centerpiece of Fluor’s commitment to conducting our business—everywhere we operate—legally and with high standards. It is a resource or tool for you to use when you need information or guidance before making a decision. The Code cannot possibly cover every subject matter or situation, but we are confident that if you read, understand and follow it, you will know the right questions to ask, the right experts to consult, and the right way to make your decision. Additional, more detailed policies and procedures covering many topics in this Code (many of which are found in Human Resources policies) are available from Fluor’s Intranet at http://hr.fdnet.com or from your local Human Resources manager.

Updates and Revisions to the Code

This Code may occasionally be updated or amended to reflect changes in laws and company policies and practices. The most current and authoritative version of the Code is always available on www.fdnet.com.

What About When Laws Are Different in Other Countries?

We do business in all regions of the world, many of which have different laws, regulations and business practices than those of the United States. Because Fluor Corporation is a U.S.-based company listed on the New York Stock Exchange, many U.S. laws apply outside of American borders, some of which differ or conflict with the laws of other countries in which we do business. Our country-based policies and procedures are designed to uphold local laws. However, situations may arise where non-U.S., U.S. laws or our policies and procedures are in conflict. If you believe this is the case, you should contact your department manager or the Legal Services Group.

We have set global standards to help ensure that Fluor’s values are upheld everywhere we do business and that we conduct business fairly and honestly. These global standards (for example, this Code, Human Resources policies and Health, Safety and Environmental (HSE) standards) help establish the specific local company policies and procedures.
Getting Help and Reporting Suspected Problems

Whom Should I Contact with a Question or Concern Related to the Code?

You should normally proceed as you would in other situations by first considering the steps you can take to try to remedy the situation. If possible, discuss the question or concern directly with the person involved. Then try contacting your immediate supervisor. However, if your supervisor’s response is not adequate or does not satisfy you or if it is uncomfortable or inappropriate for you to speak to your supervisor, there are other options:

- Your local Human Resources manager
- Your supervisor’s supervisor (and escalate further up the reporting structure as necessary)
- A Fluor Company Expert (see list, page 29)
- Fluor’s Compliance and Ethics Hotline (see contact information, page 29)

Situations can and do arise where getting an answer is not easy or where it is necessary to report a concern about suspected unethical misconduct. Fluor is committed to doing the right thing and will protect you from retaliation if you report suspected illegal or unethical conduct in good faith.

What Happens When I Call the Fluor Compliance and Ethics Hotline?

The Fluor Compliance and Ethics Hotline is available 24 hours a day, 7 days a week. Translators are available to talk with you in more than 150 languages. Like most companies, we use a third-party call center to answer
these calls and transcribe the information you report. When you call the hotline:

- The operator will ask you for your name and contact information.
  - You are not required to identify yourself—Caller ID is never used and there will be no effort to trace your call.
  - However, investigations are generally more successful when callers identify themselves.

- The operator will ask for detailed information about your concern or question.

- You will be given a case tracking number.

- You will be asked to call back in a few weeks (or if you have identified yourself, an investigator will call you to ask you) to provide further information that may be necessary to thoroughly investigate the matter reported.

The more information you provide, the easier it will be for the company to investigate or appropriately respond. However, many callers have concerns that by giving detailed information the company or the employee's supervisor will discover who made the Compliance and Ethics Hotline call and the caller will be retaliated against. Fluor is committed to maintaining confidentiality to the highest extent possible in order to protect employees and to disclosing information only on a strict need-to-know basis. Retaliation of any kind against an employee for raising a concern in good faith, even if the concern turns out to be unfounded, will not be permitted.

A report will be provided to the heads of Corporate Security and Corporate Compliance, who will determine what steps need to be taken to either respond to the caller or investigate the matter. The call information will be shared only with employees and outsiders who have a legitimate business need to know.

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**Call center**

**Interview caller**

**Details to Corporate Security and Compliance**

**Assigned to proper investigating department**

**Results reported to Corporate Security and Compliance**

**Call center contacts caller or, if anonymous, caller may call back**

**CASE CLOSED**

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**What If I Am Retaliated Against for Using the Compliance and Ethics Hotline or Otherwise Reporting a Problem?**

Fluor will not tolerate any direct or indirect retaliation against an employee for reporting a suspected problem in good faith, even if the concern turns out to be groundless. If you suspect you are being retaliated against, contact Human Resources or the Compliance and Ethics Hotline. Retaliation against someone who reports a problem in good faith will result in prompt and strong sanctions against the retaliator, up to and including termination.

**Consequences of Violating the Code and Not Reporting**

Violations of the Code of Conduct can result in discipline, up to and including termination. In appropriate cases, the company may also refer misconduct...
to appropriate authorities for prosecution and may seek to recover damages against the wrongdoer.

Every employee has an obligation to report serious violations of this Code to their supervisor, Human Resources or the Compliance and Ethics Hotline, even if they are in no way involved in the violation itself. Not reporting a serious violation could result in discipline. Managers have a responsibility to follow up when they suspect potential misconduct. Looking the other way is not acceptable. We are all under an obligation to see that Fluor upholds the law and the standards outlined in this Code.

The following are examples of conduct that may result in discipline:

- Violating the Code or other company policy
- Requesting that others (employees or third parties) violate the Code or other company policies
- Not cooperating in a company investigation related to suspected violations of the Code or other company policies
- Retaliating against an employee or third party for good faith reporting of a suspected Code or policy violation
- Failing to provide the necessary leadership and failing to take responsibility for employee compliance with applicable laws and company policies
- Not promptly reporting a suspected serious violation to Fluor

Remember: Looking the other way is not acceptable
Our Commitment to Safety and Security

Everyone who works for or with Fluor or any of its subsidiaries knows that safety is our highest priority. We believe that providing a safe and secure work environment gives us a competitive advantage—in attracting the best applicants, retaining our valuable workforce, and winning and keeping clients. Fluor’s reputation depends on a continued strong safety record.

Every employee is responsible for following safety and security policies and regulations and for helping make the workplace safe for everyone. Violations of safety policies should always be reported to your HSE Manager. Failing to properly report a safety violation or asking another employee not to report one is a violation of this Code and may result in discipline as appropriate and as allowed under local laws.

Global Standards and Local Policies

Safety regulations vary in different countries and states. Fluor has set global standards for promoting safety, which in turn are used to create local safety policies and procedures that are consistent with both local regulations and Fluor’s global approach. Fluor has detailed safety policies at every location and project site that vary depending on the job requirements and local regulations. It is each and every employee’s responsibility to know and follow local safety policies. Managers shall require agents, subcontractors, and clients to have safety policies and practices at least as stringent as Fluor’s.

Protecting the Environment

Fluor must follow local environmental laws and regulations at every one of our work sites. We must also provide project designs and plans to our clients that do not conflict with local environmental laws.

Drugs and Alcohol in the Workplace

Many employees work where the use or possession of alcohol or drugs, or reporting to the job under the influence of alcohol or drugs, would compromise their own and other employees’ safety. For example, if an employee on a construction site were operating heavy machinery while on narcotic pain killers (even if the drugs are legally prescribed), this could interfere with his ability to use the machinery safely. We have specific policies that outline rules on the use of drugs and alcohol in the workplace.

Use of illegal drugs is not permitted at any Fluor facility or project site at any time.

Alcohol may only be served at company functions (such as a company picnic or holiday party) in accordance with your local office practices, including

Remember: Safety is everyone’s responsibility

Q: My team gets a monthly and annual bonus if we meet or exceed our safety goals. One of my coworkers cut his finger on the job and needed stitches. He doesn’t want to report the injury as a workplace injury because it will hurt our goals and bonus. What should I do—I want to get the bonus too?

A: While everyone wants to get a bonus, not reporting a workplace injury is a serious violation of Fluor’s standards. Both you and your injured teammate could be subject to discipline for not reporting the injury. Not reporting means we cannot fix a potential safety risk. We want employees to earn safety bonuses because of a truly safe work environment, not because injuries aren’t reported.
necessary authorizations, or as part of routine business custom (such as a business dinner at a restaurant with Fluor managers and clients).

**Weapons and Violence in the Workplace**

Personal weapons, such as guns and tools that can be used to harm others, should never be brought into the workplace. Violence, threats of violence, harassment, threatening remarks or gestures, or other disruptive behavior in the workplace are unacceptable.

**Q:** On a maintenance project I manage, we came across asbestos that needs to be removed. Our contract specifies that the client is responsible for handling and removing any toxic substances such as asbestos, but I worry that our schedule and budget will be harmed if we wait for the client to take care of this. It would be more efficient for us if we had a Fluor worker remove the asbestos using proper safety equipment. Is this acceptable?

**A:** No. You clearly should not remove the toxic substance even if it negatively impacts the budget or timing of a project. Because of legal risks and costs related to handling environmental contaminants, Fluor has made a strategic decision to have clients manage environmental issues of this sort. Even if the client pressures you to “just get the job done,” do not. Costs related to environmental liability can be huge and are not generally contemplated or priced in Fluor contracts.
Treating Employees Fairly

Fair Employment Practices

The laws in many countries that promote the fair treatment of workers—especially women and minorities—vary considerably. Because of this, Fluor has established global standards so that employees around the world are treated with respect and fairness.

Employment decisions—such as hiring, promotion, pay, termination, training opportunities and job assignments—should be made on the basis of qualifications, experience, competence and performance, and not because of a person’s protected characteristics, which may include:

- Gender
- Race
- Color
- Religion
- National origin
- Other characteristics protected by law (for example, affiliations, associations, beliefs and sexual orientation)

Workplace Harassment

Employees should work in a safe and professional atmosphere, where merit and competence are vital, and diversity and trust are promoted. We strive to create a work environment that is free from harassment by coworkers, supervisors, providers of goods and services, contractors and clients. Workplace harassment can occur in many forms including verbal, physical or visual. All forms of harassment share a common trait—the behavior may create an intimidating, offensive or demeaning environment.

Examples of potential sexual harassment can include: unwanted advances, inappropriate sexual jokes, sexually suggestive comments, touching, requests for sexual favors and inappropriate comments about appearance.

Other examples of harassment include: offensive comments, jokes or pictures related to race, religion, ethnicity, gender or age. Even materials and comments sent privately using company e-mail or voice-mail can be considered harassing.

Offensive gestures, comments and communications have no place at Fluor.

Protecting Confidential Employee Information

For personnel, payroll and certain routine operations, Fluor maintains and uses private and sensitive personnel information about employees (such as home addresses, education, resumes, social security numbers and compensation data) for legitimate business purposes. There are many data privacy laws around the world that govern the handling of such information. However, we also depend on employees to respect information privacy by:

Q: I am working on a project in a developing country where certain ethnic groups are not protected by local labor laws from discrimination, harassment, and unfair treatment. What does this mean in terms of how we treat employees in this country?

A: Fluor does not discriminate against anyone based on criteria unrelated to work performance—that is a global standard that we will not compromise. All employees in your country will be treated with respect and protected against harassment and unfair treatment; the same principle applies to gender, people of diverse religions, and all protected categories.

Q: I work on a project and our client has been overly flirtatious and has asked to come to my hotel room. I don’t want to anger or upset the client by saying “no” to him but I don’t know what to do.

A: While this is clearly a difficult situation for you, you should tactfully tell the client that you are not comfortable with his apparent advances and that you wish to keep the relationship purely professional. If this does not work you should discuss the matter with your supervisor and/or your local Human Resources manager.
Only accessing and sharing confidential employee data
  – for legitimate business purposes
  – with proper approvals and
  – on a need-to-know basis.

Not repeating or discussing information with anyone who is not approved
to know such information

Not requesting or requiring detailed information about an employee’s
health, except on a need-to-know basis

**Background Checks**

Just as we try to require that the employees and subcontractors we hire are
competent and professional, we must also know that they are reputable and
honest. Human Resources routinely conducts pre-employment background
checks on new hires, as appropriate on an as-needed basis. Anyone
involved in procurement decisions and hiring of contractors or consultants
should also conduct appropriate background checks of the consultants and
contractors as outlined in Fluor’s Request for Proposal (RFP) and bidder
selection policies.

**Q:** I am friends with a man who works in my department. Sometimes we will share
jokes that might be considered offensive in my office but we are careful to shut the door
so no one hears. We also forward each other funny jokes via e-mail. Could this be
considered harassing behavior even though it is between two friends and not shared with
anyone who is offended?

**A:** While the company does not attempt to regulate employees’ private behavior, the situation you describe takes place on company property, on company time and on a company e-mail system. This behavior does not fit in our workplace, even in the privacy of your office.

**Q:** I was told that looking at pornographic material in private is against company policy. Why does the company care if no one else sees it but me?

**A:** Viewing sexually inappropriate material using company or client computers is an inappropriate use of company time and resources and will result in discipline. Fluor IT closely monitors computer systems and can detect when employees are accessing inappropriate material.

**Q:** In my department, there are employees of all ages and I am among the older group. I heard two managers talking about how they need to promote more “younger” people because they have more energy and drive and because they aren’t going to retire for a long time. I worry that I will get passed over for promotions because of my age. What should I do?

**A:** You should contact your supervisor or your local Human Resources manager so that the company can conduct a proper investigation to determine if age discrimination has occurred in practice, not just in conversation. Fluor makes promotion decisions based on a person’s skills, knowledge and ability. The company will not permit retaliation for reporting problems in good faith.
Accurate, Full and Fair Disclosure

Fluor Corporation is a publicly traded company and our financial results must not only comply with Generally Accepted Accounting Principles (GAAP), but they must also be accurate, full, fair, timely and understandable.

The accuracy of our financial results depends on each and every employee properly recording information such as: time charges, change orders, project estimates, sales, expenses, costs, bills, payroll, and regulatory data. As an employee, you should verify that any financial results for which you are responsible are accurate and complete.

Because many projects take months or years to complete, the company uses trained financial personnel/estimators to determine how much revenue and profit can be recognized for reporting financial results. These estimates depend on the accuracy of information provided by project managers and project personnel.

Managers must take responsibility that adequate resources and oversight are devoted to properly implementing and following financial controls on all projects, at all locations and at all times.

Warning Signs

Warning signs that financial results could be inaccurate include:
- Stated results do not reflect the true performance of the business
- Sudden or surprising improvements during a period’s performance are not easily explained
- Results barely meet a stated goal that triggers incentive compensation for an individual or group

Pressure to Meet the Numbers

No employee should ever be pressured to alter financial or other data to “meet the numbers,” help the stock price, help “the company,” save jobs or for any other reason not related to actual financial performance. Any manager or employee who pressures or asks another employee to inappropriately alter financial results or other information, or who does so themself will be subject to discipline, up to and including termination.

Fear of Reporting “Bad News.” Employees sometimes worry about reporting negative financial results to management, and they may want to delay doing so until the last minute. This tactic, however, will only make the problem worse and decreases the chances of solving or lessening the problem. At Fluor, all financial information—whether good or bad—needs to be reported accurately and timely.

Holding Back Profits for Future Periods. Saving for the future is a desirable trait in life and in business. Projects with higher risks justify taking more reserves. However, Fluor will not tolerate managers inappropriately holding back reserves, profits or other contingencies when a project is doing well purely to protect against possible bad numbers later. Reserves, contingencies and profits should be analyzed and reported using proper GAAP and internal accounting policies and with proper supporting documentation.
Discussing Financial Information and Results

Employees in many positions, departments and ranks have access to information about financial results—Fluor’s and other companies’—on a routine basis. Examples include:

- Profit margins or earnings
- Quarterly projections and results for a particular project or division
- Winning or losing a significant award or awards
- Entering into a joint venture or similar agreement
- Buying or selling a company or business group
- Receiving or settling a significant lawsuit or government action

There are many other examples of important financial information that employees have access to that are not available to the general public. It is important for all employees to keep this information confidential and not discuss it or allow it to be overheard by anyone inside or outside the company, except on a need-to-know basis.

Inquiries from Outside. Media and stock market analysts may sometimes contact employees for information about financial results, new awards, clients and a variety of other topics. All media inquiries should be directed immediately to the Fluor Corporate Communications or Investor Relations Departments.

Presentations Outside the Company. Our employees frequently make presentations to outside groups such as at professional conferences and training seminars. Any presentations that contain financial or proprietary information or processes must be approved in advance by the Legal Services Group.

Insider Trading

As an employee of Fluor or one of its subsidiaries, you are likely to come across confidential information about the company, our clients or our partners that could influence your or someone else’s decision to buy or sell stock in Fluor or one of these other companies. Buying or selling securities or advising others—such as friends, family, coworkers, brokers, business associates or anyone—to buy or sell securities while aware of material information that is not available to the public is considered “insider trading” and is illegal. Giving “tips” to others is a common and serious violation of these laws.

Insider information includes any confidential, material information that has not been released to the public or public securities markets such as:

- Financial information or data such as earnings or forecasts
- Winning or losing a significant new or existing client
- Financial liquidity problems
- Changes in senior management
- Significant or expected developments in litigation or government investigations
- Mergers, acquisitions or divestitures
- Changes in a company’s outside auditor or notification from auditors regarding financial statements
- Changes in dividends

Q: A market analyst called me today to ask if the rumor that we had been awarded a major project we had bid on was true. We did win the contract but it has not been publicly announced. I don’t want to lie to or mislead the analyst. What should I say?

A: Only spokespersons from the Corporate Communications and Investor Relations Departments (as well as the Chief Executive Officer, Chief Financial Officer and the Chief Legal Officer) may speak about the company’s financial status. Fluor’s policy is never to comment on market rumors. You should politely tell the analyst you are prohibited from speaking about such matters and provide the contact information for Corporate Communications or Investor Relations.

Q: I sometimes know the financial results before most other people in the company. If we beat our forecasts, this seems the perfect time to buy Fluor stock. Right?

A: Wrong. If your information has not yet been shared with the public, and it is important enough that investors might change their perceptions of the company, then you should not buy or sell. In a sensitive position such as yours, it’s wise to check with the Legal Services Group to determine a safe window for investment actions.
“Material” information is information that a reasonable investor would likely consider important in making a decision to buy or sell a security. Even information about events or actions that are not certain to happen, such as the possible signing of a contract or sale of a subsidiary, can be considered material.

**When Can I Trade?**

Once material information has been disclosed publicly to the marketplace through established channels and the public has had enough time to absorb the information, a company insider may trade in Fluor or the related company’s stock. Fluor’s policy allows trading on and after the start of the third business day after material information is disclosed.

Selected Fluor officers and other employees considered company insiders because of their regular access to material inside information can only trade during specified “trading windows.” These individuals are notified that they are subject to these requirements and can only trade with the pre-approval of the Chief Legal Officer.
Conflicts of Interest

A conflict of interest occurs when an employee’s personal or financial interests take priority over the company’s best interests. An easy example would be if a Fluor manager hired a subcontractor owned by his or her family. The manager’s ability to fairly and objectively hire and then manage a subcontractor owned by his family could be compromised or appear to others to be compromised. This is called a conflict of interest and must be disclosed to the company.

Examples of conflicts of interest include:

- Hiring or recommending the hiring of a supplier, subcontractor, agent or consultant where the Fluor employee has a close family member employed by, or has a substantial ownership stake in the entity
- Accepting a gift or favor from a supplier, subcontractor, agent or consultant that benefits personally a Fluor employee or a close family member
- Performing services for or serving as a director or consultant for a Fluor competitor, supplier, subcontractor or agent while employed by Fluor
- Taking a business opportunity for yourself or close family member that rightfully belongs to Fluor or one of its subsidiaries or is in competition with Fluor
- Using company assets, contacts or other resources to start or support a private business or non-profit organization
- Serving on a board of directors or other advisory position for a Fluor competitor, supplier, contractor, agent or client
- Serving on a board of a company, non-profit or community organization when the organization has direct commercial dealings with Fluor

Fluor officers are required to obtain approval from the Chief Legal Officer before serving on any board, including non-profit and community boards.

Suppliers and Contractors. These rules on conflicts of interest apply to relationships with any Fluor supplier, agent, contractor, consultant or client as well as to any person or organization that is actively seeking to win business from Fluor or one of its subsidiaries.

Close Family Members. A close family member is any person closely connected by blood, marriage, close affinity or formerly connected by marriage. This includes any person within the following relationship to a Fluor employee: spouse, child, parent, sibling, half-sibling, grandparent, grandchild, niece, nephew, uncle, aunt, mother-in-law, father-in-law, brother-in-law, sister-in-law, son-in-law, daughter-in-law, grandparent-in-law or step-grandchild. A close family member also includes an employee’s domestic partner or the domestic partner’s child, parent, sibling, half-sibling, grandparent, grandchild or step-parent.
Perceptions of Conflicts of Interest. When other employees, suppliers, the media, clients, shareholders, the government and other groups and individuals perceive that Fluor, its subsidiaries or an employee has a conflict of interest that calls into question our business integrity, this can be as damaging to our reputation and business as the existence of an actual conflict. It is important to avoid even the appearance of a conflict of interest.

Resolving Conflicts of Interest. Many conflicts of interest can be resolved acceptably if they are disclosed to the company beforehand. For example, a manager might be excluded from making a purchasing decision or managing a contract that involves a close family member. The important point is to let your supervisor, your Human Resources Manager or the Legal Services Group know about your potential conflict.

Unacceptable Conflicts of Interest. Employees are prohibited from behaving in such a way as to create a conflict of interest. For example, using your position at Fluor for personal gain, is strictly prohibited. Employees may be required to stop performing the activity causing the conflict of interest, or in some circumstances, the employee may be terminated. Remember, disclose any potential conflicts of interest before acting to avoid putting yourself in such a situation.

Gifts, Entertainment and Business Courtesies
To win and keep business, entertaining potential clients, existing clients and partners is part of accepted business practice. However, gifts, meals and entertainment with clients, suppliers and partners must be reasonable and not excessive. This includes when Fluor is both giving and receiving such business courtesies. We must not compromise or appear to compromise our ability to make objective, “arms length” business decisions. If others believe that a business decision was made because of a gift or business courtesy and not purely on the basis of merit and sound business judgment, our reputation will be harmed.

Government Clients. When U.S. federal, state or local and certain foreign governments or government entities are involved, more restrictive rules usually apply. See “When the U.S. Government is Your Client” supplement to this Code.

Usually Acceptable. Common business courtesies that are usually acceptable and do not ordinarily require prior approval include: occasional meals with outside business associates, occasionally attending sports and other cultural events with business associates, occasionally accepting reasonable and customary gifts, and accepting promotional items of nominal value such as hats, shirts, golf balls, pens, notepads or coffee mugs.

Unacceptable Gifts. When excessive gifts are received from suppliers of goods and services, the item must be returned to the supplier of goods or services with a clear explanation that the gift violates the company’s gifts and entertainment policy. In some cases, it is acceptable

Rules to Live By
Don’t give or accept a business courtesy if:
- You or the recipient would feel uncomfortable discussing it with your supervisor or coworkers
- Sexually inappropriate or offensive content is involved
- Cash or a cash equivalent (such as a gift certificate, discount, service, or a security) is involved
- It makes you feel uncomfortable, influences your ability to be objective or gives the appearance of such
- It violates Fluor’s or the recipient employer's standards

Q: One of Fluor’s office equipment suppliers has offered to give me the same discount Fluor has negotiated to buy furniture and equipment for my home office. Is this acceptable?
A: Probably not. A supplier discount is only acceptable if it is available to all Fluor employees. If the discount is offered only to you, then it is not appropriate. This situation could be a problem from a variety of perspectives: an improper gift, an attempt to influence Fluor business decisions, and an appearance problem.
for the person who gave the gift to request that the item be donated to a charity of the company’s choice. Consult your supervisor or your local Human Resources manager for guidance.

**Sexually Explicit Entertainment.** Sometimes clients, suppliers of goods or services and employees have an interest in having business dinners and entertainment that involve sexually inappropriate content. In some cultures, certain clients may expect such types of business entertainment from Fluor. Such activities can create an uncomfortable work environment for employees, clients and suppliers of goods and services. If this situation arises, you must explain tactfully that your company does not permit time or funds to be used for sexually explicit entertainment. Offering to pay for it personally or have the client pay for it himself does not solve the problem either. As part of Fluor, we may not do indirectly what we are prohibited from doing directly.
Zero Tolerance for Bribery

In many parts of the world, bribing government officials and business people to win lucrative contracts is both accepted and expected. Corrupt payments to foreign officials—public or private—are against the law and are a threat to fair competition. Fluor will not participate in bribery of any third-party, public or private—either directly by its employees or indirectly by using third parties. Even when our competitors choose to win business this way, Fluor will not. Fluor also prohibits bribes by any partners, agents, contractors, suppliers or any entities over which the company has control. Any Fluor employee paying or facilitating a bribe will be disciplined, up to and including termination. In addition, the employee may be subject to personal liability and possible jail time, as provided under applicable laws.

What Is a Bribe?

A bribe is an offer to give, giving or promising to give anything of value to IMPROPERLY INFLUENCE actions by a third party. Bribes may include money, gifts, travel expenses, hospitality, vacations, cars, expenses, below-market loans, reciprocal favors, political or charitable contributions, or any direct or indirect benefit or consideration.

Use of Agents, Consultants, Representatives and Other Third Parties

In many parts of the world, it is necessary and even required to use agents, consultants, representatives or other third parties to arrange or broker deals with foreign governments or government entities (such as a government-owned oil facility or power plant) and private entities. These relationships can be tricky. Some competitors have even used agents illegally to funnel bribes to government officials. Fluor will not pay bribes either directly or indirectly for any reason, even if we lose business because of our refusal to do so.

U.S. law and the laws of most other countries make it a crime to pay a bribe to a government official, even if the payment is made through a third party. The company and participating employees may be liable under U.S. or local laws not only for actions of its employees but also for our agents in certain circumstances. For example, Fluor could be held liable if the company knew that its agent was going to pay a bribe, failed to take the appropriate steps to attempt to prevent such payment, and thus implicitly authorized the bribe.

Employees involved in relationships with agents or other third parties must:

- Upon initiating discussions with a potential agent, require the agent to sign a “non-representation” letter prepared by the Legal Services Group to help ensure that the company is not bound by informal discussions, misrepresentations or unintended “finders fees”
- Involve the appropriate groups (Sales, Legal Services and Corporate Security) and perform a thorough due diligence background check on the prospective agent or third party
Have a written agency agreement signed and approved by Sales and the Legal Services Group before committing to work with an agent.

Take steps to communicate that Fluor is serious about not paying bribes to government officials in order to win business, even if this is common practice in the country. The agent will be provided with Fluor’s appropriate policies and guidelines and, if appropriate, training on such policies.

Monitor the agent’s actions as reasonable and appropriate.

Report any suspicious or questionable behavior, transactions or receipts to the Legal Services Group.

**Joint Venture Partners, Suppliers and Subcontractors.** The company has standard due diligence procedures, contract language and requirements for joint venture agreements (which vary depending on the level of control over the joint venture), suppliers and subcontractors. All business and functional groups relevant to a particular transaction must be appropriately involved in the due diligence. The expectation is that when an employee works on a joint venture, they must comply with Fluor’s policies, procedures and other requirements, including following this Code.

**Due Diligence.** Due diligence background checks are required for our business partners such as agents, consultants, suppliers, subcontractors and joint venture partners and include:

- The location and nature of services provided by Fluor (high-risk countries require special due diligence)
- Transactions directly with foreign governments or their agencies
- Transactions involving high-dollar-value projects
- Joint ventures, suppliers of goods and services or subcontractors who are based in countries that do not prohibit or enforce laws against bribery

**Facilitation or Expediting Payments**

While bribes to government officials to influence purchasing decisions are never permitted, paying “facilitation payments” is sometimes allowed as described below, although Fluor discourages this practice. A facilitation payment is a small payment, given to a government employee, usually in cash, to expedite or secure the performance of a routine process. For example, in some developing countries a small cash payment may be necessary to expedite utility services, provide needed police protection or approve the granting of a work permit or visa. These facilitation payments are permitted if they meet the following criteria:

- The payment is to facilitate a routine, ministerial act and not to influence a procurement decision
- The amount paid is nominal in value
- The amount is properly reported as a facilitation payment on the employee’s expense reimbursement forms (for example, not as simply “tips at airport”) and in the company’s books and records classified as “other” with a description called “facilitation payments”
Export Controls

Fluor sometimes provides equipment and technology to projects that are subject to export control laws. For example, software and protective equipment provided abroad to projects are often subject to export control and must be appropriately cleared for export. Employees who transport and/or use goods and technology subject to export controls must be conversant with and in compliance with the relevant laws, regulations and related company policies and control procedures.

Examples of export-controlled items that may require obtaining a license prior to export include:

- Aluminum alloy rods and exotic metals
- Technology related to gas turbine engine components
- Multi-valve pipe, certain valves and pumps, including centrifugal pumps, and fully lined vessels
- Personal protective equipment such as helmets and vests used to protect personnel in areas with security risks
- Computer software taken into certain countries or given to individuals who are not U.S. citizens and who are not approved to have that computer as part of the company’s business practices
- Transfer of certain technical data or software to non-U.S. citizens or into countries subject to technology transfer restrictions

The handling and the re-export (movement to a different country) of such equipment and technology, subsequent to obtaining a license, must be consistent with the terms of the license and all applicable regulations of the appropriate government agency.

Trade Sanctions and Boycotts

Trade Sanctions. The U.S. government maintains a list of countries and individuals with which U.S. companies may not do business because of trade sanctions. We also are prohibited from doing business with citizens of those countries. For an up-to-date list of these countries and individuals, contact the Legal Services Group.

Boycotts. U.S. law prohibits U.S. companies from participating in any boycott or restrictive trade practices against countries considered “friendly” to the United States and against companies that are “blacklisted” by other countries or firms. For example, some companies in the Middle East may seek to include language in contracts that prohibits Fluor from doing work in Israel. U.S. law will not allow such language to be included or enforced in a contract.

Any request to participate in a boycott must be promptly reported to your manager and the Legal Services Group even if Fluor decides not to bid the project. Fluor is required to report all such requests to the U.S. Government.

Child and Forced Labor

In some parts of the world, companies use child labor and forced labor. Fluor does not condone the use of child or forced labor by the company or any of its suppliers, clients or partners.
Protecting Company Assets

Information

Fluor manages and utilizes information in its projects every day. We are often entrusted with highly confidential data and information by our clients, suppliers and partners. We must respect and protect our own and others’ information with the utmost care.

Fluor’s Information Assets

Our proprietary and confidential information—such as work processes, project procedures, clients and supplier lists, and personal information regarding its employees—is an invaluable part of our assets. A variety of company policies and procedures, such as those discussed related to Fluor’s computer systems, exist in order to protect Fluor’s assets. It is equally important that you be prudent and vigilant, both on and off the job, in protecting our confidential and sensitive information. Discussing new Fluor business in a public place, copying or archiving lists of employee social security numbers, answering questions that suppliers of goods and services have about a coworker’s position with or responsibilities in the company could have a significant negative impact on our business.

Managers. Managers should oversee that confidential and proprietary information is provided to other employees only on a need-to-know basis and that safeguards are put in place to protect this information from unintended or deliberate misuse.

Joint Venture Partners. Fluor has many joint venture partnerships with companies that can also be our competitors, suppliers or clients in other circumstances. Communication in these joint ventures is obviously critical, but Fluor must take reasonable steps to protect confidential and proprietary information, both received and given, from accidental and inappropriate disclosure or from use outside the joint venture context. Most Fluor joint venture agreements clearly specify and limit access to Fluor information and systems to certain individuals. Those agreements are developed to protect Fluor and should be followed.

Confidentiality Agreements. We frequently sign confidentiality agreements with our clients or prospective clients since our employees will have access to highly confidential client information. In turn, Fluor requires many employees to sign confidentiality agreements for work on specific projects. Those agreements should be read, understood and followed.

Information from Prior Employers

Our employees possess professional skills from years of training and experience as well as specific information about our, our clients’ and our partners’ businesses. Confidential and proprietary information about prior employers and their businesses should stay confidential even when an employee leaves or joins Fluor. We must respect the confidentiality
agreements of former employees just as we want our agreements respected when an employee leaves the company.

Respecting these rules does not mean a new employee cannot use his professional knowledge and skills gained while working for another company. Skills and experience are vital in making hiring decisions. However, confidential or proprietary information or data should never be shared from former employers even if the new employee offers.

Information about former employers should never be used by newly-hired or former employees of the company including:

- Specific technical, design or process data
- Trade secrets or confidential information
- Software licensed to the former employer
- Anything marked or intended to be confidential or proprietary and which is not publicly available

Every employee is required to sign a standard confidentiality agreement when they begin employment at Fluor or one of its subsidiaries that stipulates that proprietary and confidential information obtained while employed must never be shared outside the company after leaving the company.

**Personal Use of Company Assets**

Most employees need to conduct some personal business while at work—for example, calling home briefly to check on a sick child, e-mailing a spouse to alert him to stop by the bank on his way home, or printing a grocery list on a work printer. All of these things are reasonable and permissible when done within limits and as long as work goals are accomplished. However, a problem is created when employees over-use or abuse company assets for their personal use or gain. Taken too far, it can even be fraud or theft.

**Remember: Personal use of Fluor assets must be reasonable and kept to a minimum**

Employees who are required to bill their time to the company or clients must report their time accurately and fairly.

**Patents, Copyrights and Trademarks**

Patents, copyrights and trademarks are legal terms that define when an invention, product, idea, written work or name are owned by an individual or company and use of these by others is prohibited without express permission. This includes articles in magazines, newspapers and journals, as well as software. Never copy articles, data or software without obtaining the required consent from the author or owner.

Our employees may sometimes, on behalf of the company, develop ideas, processes and technology that will be protected by patents, copyrights and trademarks. This intellectual property belongs to the company or our clients.

Q: I used to listen to on-line radio while at work, but it stopped working. Has anything changed on the network?

A: We have always blocked on-line radio stations, also known as streaming audio. The use of live streaming audio for other than legitimate Fluor business purposes is against company policy and causes congestion or disruption of network services not only for your local office employees, but also for external remote users, customers and projects sites.

Q: I saw a great article in a magazine that I would like to share with my team. Is it okay to copy the article and distribute it?

A: No, not unless you have obtained express written permission of the copyright holder, which is generally the publisher of the magazine. Such permission is usually granted for payment of a fee or the publisher will sell you the reprints. Failure to obtain permission could subject both Fluor and you personally to liability, including substantial fines, under the Copyright Act. Creating a routing slip to circulate your copy so that the magazine can be read by multiple employees is an acceptable option if you do not obtain copyright permission.
(depending on the situation and on the clients’ contract terms) and not the employee.

**Managing Documents and Records**

Which documents and records to keep or dispose of and how to do so can be confusing in a work environment filled with huge amounts of electronic and paper information. Fluor has a detailed policy for each group and in each country detailing when and how long records should be retained. Each project should designate a document control manager to implement those policies.

**Computer and Data Security**

Fluor owns the technology we use in our business—hardware, software, data, and networks. Our technology and information is critical to our success. Everyone who uses a computer at Fluor is responsible for protecting our valuable technology resources. If you see that anyone—an employee, client, supplier or goods or services or consultant—is placing the performance and/or security of any Fluor information system at risk, you should immediately advise your supervisor or your IT manager.

Things *never* to do while using Fluor technology and systems:

- Access a Fluor system using another person’s credentials or information without permission or authorization
- Try to access information or technology that you are restricted from
- Communicate offensive, inappropriate or illegal material to anyone inside or outside the company
- Forward chain letters (inside or outside the company)
- Access the Fluor intranet without going through proper IT security processes (computer viruses could penetrate the system), or authorize or facilitate such access by any third-party such as a friend, family member, supplier of goods or services or client
- Add or modify computer software or hardware on Fluor computer equipment without IT approval

If you share your password, user ID, network access information or badge IDs with anyone, even a coworker or administrative assistant, you are responsible for any actions that person takes while logged into the system.

**Rules to Live By**

- Be careful not to make speculative statements that could be misleading or erroneous when read by others (for example: “I can’t believe we made such an engineering error...”).
- Electronic documents and information can be retrieved even after you have “deleted” them from your computer’s memory, so be careful about including sensitive information in electronic communications. (Remember: “e-mail is forever.”)
- Remember to follow document disposal policies and procedures and require that those whom you manage also follow them.
- Do not copy or forward documents that are subject to attorney-client privilege unless specifically directed by the Legal Services Group.
- Never delete or destroy records or information that is subject to or likely to be the subject of a government investigation, internal investigation, subpoena, or lawsuit.

Q: Why can’t I access my personal e-mail account from work?

A: Web-based e-mail (such as, but not limited to, Hotmail, AOL, Yahoo!, or Gmail accounts) poses a threat to Fluor by allowing an entry point for mail that circumvents current security controls that are in place to prevent the spread of malicious code, viruses and worms. Unfortunately, we currently do not have control over Internet web-based e-mail that enables users to read personal e-mail and open attachments on their Fluor desktops and laptops. By allowing this type of access to online web-based e-mail accounts inside our network, we are providing access for malicious software, Trojan horses, and other viruses and worms into and out of our environment without our knowledge.

Q: I left my laptop on an airplane and my passwords were in my computer bag. What should I do?

A: You should first file a police report and ask for a copy. Then contact Fluor Corporate Security with a copy of the police report and Fluor Information Security to report the theft.
The company’s computer, telephone and electronic resources are intended for use by company employees to conduct company business. All e-mail, voicemail and personal files stored on Fluor systems are company property. You should therefore have no expectation of personal privacy in connection with these resources. The company reserves all rights permitted by law, to monitor and review any messages and information (sent or received) using company resources.

Chat Rooms, Blogs and Message Boards. Most employees have access to the Internet on their work computers. You should be careful to protect Fluor’s reputation and business information by not posting any comments on chat rooms, blogs or message boards about Fluor—both negative and positive—that could be attributed to a Fluor employee acting on behalf of the company. You should never use company time, property or networks for such communications. If you choose to do so outside of your work environment, you should:

- Clearly state that these are your personal views and not the views of the company
- Ensure that your communications do not violate the law (for example, libel, defamation, harassment or copyright laws) or company policies (for example, disclosure of confidential or proprietary information or speaking on behalf of the company)

Q: I regularly read the Yahoo! Message Board for our company and noticed that a question was posted asking for confirmation on a significant project our company has been rumored to win. Although the official announcement has not been made to the public, I know we are doing preliminary work for the client on this project. Is it okay for me to respond on the message board and answer the question that we have received the work?

A: No, it is against company policy to publicly post confidential or proprietary information on message boards or in chat rooms.
Fair and Open Competition

Fluor succeeds in the marketplace because we deliver superior services and results to our clients. We believe in the free market system where merit, quality, price and other objective factors determine who succeeds and fails. Fluor’s employees should never agree to set pricing or contract terms in coordination with a competitor. This is wrong and violates antitrust and competition laws.

In the United States, and many countries around the globe, laws prohibit price fixing, dividing territories, agreeing to contract terms, and other similar activities with competitors that negatively impact the consumer and are counter to free market principles. These laws vary depending on where you are doing business. Many laws, including those of the United States, apply even when you are doing business outside U.S. borders.

Information about Competitors

To compete effectively in the marketplace, it is appropriate for us to gather competitive information fairly. However, some forms of information gathering are wrong and can violate the law—in the United States, one such law is the Economic Espionage Act.

Fluor is committed to conducting its business responsibly, ethically and legally, which includes avoiding even the appearance of improper information gathering. It is important to know what you can and cannot do, and what you need to be careful about.

Competitive information that is generally acceptable to use includes:

- Newspapers, press accounts or information publicly available on the Internet
- Other public information such as annual reports or published sales materials

Rules to Live By When Dealing with Competitors

- Never discuss price or deal terms formally or informally.
- Never agree to divide territories or markets, set margins, or set contract terms.
- Never take steps to eliminate competitors.
- Never share confidential bid or proposal terms.
- Never agree to compensate each other for costs related to bidding on work without the prior approval of the Legal Services Group and disclosing it to the client.
- Clearly and openly refuse to participate in any discussions that could be construed to concern anti-competitive practices.
- Never attempt to do indirectly what you cannot do directly. Even merely “testing the water” with indirect comments or questions about deal terms or pricing is problematic and should be avoided.
- Never use information related to an upcoming or ongoing bidding process, especially in the government contracting arena.
- If you come into possession of any information about competitors that is marked confidential or proprietary, whether or not you are dealing with government procurement, or if you have had a potentially problematic discussion or interaction with a competitor that could be construed as anti-competitive, call the Legal Services Group immediately for advice on what to do.
• Conversations with clients—but not to obtain confidential information

• Clients providing a competitor’s proposal, but only if it is not confidential. If it is a bid on a government contract, always consult Fluor’s Government Contracting Organization and your supervisor immediately (see supplement "When the U.S. Government is Our Client”)

• Trade shows, trade associations or industry conferences but not discussions with competitors related to anti-competitive practices

• Industry surveys from reputable consultants or firms

**Never use the following:**

• Information on a competitor that someone offers to sell

• A competitor’s confidential or proprietary information or something similar belonging to anyone else—consult the Legal Services Group immediately if you have such information

• Confidential or proprietary information in any form discussed by new hires from prior employers

• If you are involved in bidding on a government contract and receive information about a competitor’s bid—consult Fluor’s Government Contracting Organization immediately

**Information requested by others**

At times you may be asked by a supplier, vendor or other entity to provide competitive information about that company’s competitors. You should use the same guidelines outlined above and only supply that information that is publicly available or has been obtained on a non-confidential basis. However, you need to bear in mind that if the information being requested has been obtained from the requestor’s competitor for a specific project, the terms of the contract may dictate that the information belongs to the client and/or that the information not be disclosed to any third party.

**Disparaging Competitors**

Competing vigorously is vital—but we must do so honestly and fairly. You should never make disparaging statements that are false or misleading about competitors or their services.

**Joint Venture Partners Who Are Also Competitors**

Fluor has many joint ventures with companies that we normally compete with outside the joint venture context. Those relationships are developed and managed carefully to protect confidential and proprietary information. You must always be careful not to use or discuss any pricing, cost, or strategic information given or received outside the joint venture context. Such information could lead to anti-competitive practices such as price fixing or bid rigging and insider trading, which are illegal and hurt free and fair competition.
Lobbying and Political Activity

Corporate Political Activity

Lobbying and political activity are an important part of our democracy, but strict rules govern what corporations may and may not do in this arena. Fluor is active in establishing good relationships with elected officials to enhance the company’s business environment. However, there are stringent legal restrictions on what a company can contribute, offer, promise or give to elected officials and their staffs.

Employees may not give, offer or authorize to offer company funds or other company assets (directly or indirectly) for political purposes without consulting the Senior Vice President for Government Relations who will seek approval of the Chairman and CEO and the Chief Legal Officer.

Political contributions are defined broadly and can include such things as:

- Contributing to a local, state or federal political candidate on behalf of the company
- Buying tickets for a political fund raising event
- Providing anything of value including meals, goods, services, travel, accommodations or tickets for sporting and entertaining events
- Loaning personnel or other corporate resources during working hours for political fund raising activities
- Paying for political advertisements or other campaign expenses

A political contribution could be construed as a bribe if it is done, directly or indirectly, in exchange for an action by the government official such as recommending Fluor’s selection on a procurement decision or other similar acts.

Political Action Committee (PAC)

Certain employees, who are U.S. citizens or legal residents of the United States, may contribute voluntarily to Fluor’s PAC, which was established by our employees to make political contributions to organizations and campaigns that are viewed as being in the best interests of Fluor. No employee should ever feel pressured to contribute to Fluor’s PAC, and no executive, manager or employee should ever pressure another employee into contributing to it.

Personal Political Activity

Fluor encourages political activity by employees in support of candidates or parties of their choice. However, you cannot use company time, property or equipment for your own political activities.
Lobbying

Lobbying requires disclosure to the government and covers many kinds of activities. In the United States, lobbyists must be registered. You may be engaged in lobbying if your work involves:

- Contact with legislators, regulators, executive branch officials or their staffs (for example, members of congress and their staffs)
- Making or negotiating sales for government contracts
- Efforts to influence legislative or administrative action (such as trying to influence a contract award)

Before engaging in any activities that could be considered lobbying or political activity on behalf of the company—in the United States as well as other countries—contact Fluor’s head of Government Relations.

Q: I received an invitation from a teaming partner to attend a fundraiser for my hometown congressman. I cannot attend but want to send in a check. May my assistant overnight a personal check to the campaign?

A: Company resources cannot be used for personal political activities and this includes the resources to express mail a personal check and the involvement of your assistant.

Q: At the request of a client, I recently participated in a golf tournament that doubled as a fundraiser for a political organization. I personally paid the requested amount, which included the cost of golf. May I seek reimbursement from Fluor?

A: Employees are prohibited from seeking corporate reimbursement for political contributions or for expenses tied to political fundraising events. Prior to participation, consult Fluor’s head of Government Relations.
# Index of Topics

## A
- About the Code .................................. 1, 2
- Accounting matters ................................ 10
- Accurate Books and Records ....................... 10
- Acknowledgement of the Code ..................... 1, 2
- Age Discrimination ................................ 8
- Agents, use of and hiring ............................ 13, 16, 17
- Alcohol in Workplace ............................... 6, 7
- Anonymously Raising Concerns .................... 3, 4
- Anti-Boycott Act ................................ 18
- Antitrust ......................................... 23
- Asking Questions and Raising Concerns .......... 3
- Assets, personal use of ................................ 19, 20, 21
- Assets, protecting ................................ 19, 20, 21

## B
- Background Checks ................................... 9
- Bid Rigging ........................................ 23, 24
- Boards of Directors, Serving on Outside .......... 13
- Books and Records .................................. 10, 21
- Boycotts .......................................... 18
- Bribery ........................................... 16, 17

## C
- Cash Gifts ........................................ 14
- Chat Rooms and Message Boards ................... 22
- Child Labor ....................................... 18
- Client Information, Privacy of ..................... 19
- Close Family Members and Conflicts of Interest ... 13
- Code, Applicability .................................. 1, 2
- Code of Business Conduct and Ethics, What It Is ... 1, 2
- Collusion ........................................... 23
- Company Resources .................................. 29
- Competing with the Company ....................... 13
- Competition, Fair and Open ......................... 23
- Competition Laws ................................... 23
- Competitive Information ............................ 23, 24
- Competitors, Discussions or Meetings With ....... 23, 24
- Competitors, Disparaging and Criticizing ............ 24
- Competitors, Information about ..................... 24
- Competitors, Working for .......................... 13
- Compliance and Ethics Hotline ...................... 3, 4, 5, 29
- Computer and Data Security ....................... 21

## D
- Disability .......................................... 8
- Disclosing Proprietary Information ................. 10, 11, 12
- Discrimination in Workplace ....................... 8
- Dividing Territories and Markets ................... 23
- Document Disposal ................................ 21
- Document Retention ................................ 21
- Drugs in the Workplace ............................. 6

## E
- Electronic Communications ......................... 20, 21, 22
- E-mail ............................................. 21
- Employee Data and Records ......................... 8, 9
- Employment Outside Company ...................... 13
- Employment with Competitors or Suppliers ........ 13
- Entertainment, Offering or Receiving ............. 14
- Entertainment, Sexually Explicit .................. 14, 15
- Environmental Concerns ............................ 6
- Equal Employment Opportunity .................... 8
- Export Controls ................................... 18
- Export Licenses ................................... 18

## F
- Facilitation Payments ............................... 16, 17
- Fair Competition .................................. 23, 24
- Family Members, Doing Business with ............. 13
- Federal Government, U.S. ......................... *
- Financial Disclosure and Reporting ............... 10, 11
- Fixing Prices .................................... 23

## G
- Gender Discrimination ............................. 8
- Generally Accepted Accounting Principles (GAAP) .... 10
- Gifts, Entertainment and Business Courtesies .... 13, 14
- Government Contracting ............................ *
- Government Employees, Discussing Employment with ... *
- Gratuities, Offering or Receiving .................. 13, 14

## H
- Harassment ....................................... 8
- Hazardous Materials and Safety ................... 6, 7
- Health, Safety and Environment (HSE) ............. 6, 7
- Hostile Work Environment ......................... 8
- Hotline .......................................... 3, 4, 5, 29

## I
- Information, Gathering Competitive ................. 23, 24
- Inside Information ................................ 11
- Insider Trading .................................... 11
- Intellectual Property ............................... 19, 20, 21, 22
- International Business ............................. 16, 17, 18
- Internet ......................................... 21, 22
- Investigations .................................... 3, 4
- Investment Analysts, Contacts by ................... 11
- Investor Relations ................................ 11
- Israel, Boycotts Related to ......................... 18

## J
- Joint Ventures .................................... 17, 19, 24

## L
- Lobbying and Political Activity .................... 25, 26

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*Refer to Supplement, "When the U.S. Government is Our Client."
Compliance and Ethics Hotline

If after you have raised a concern with the contacts suggested in this Code (see page 3) and are uncomfortable about using one of the other resources identified in the Code, or wish to raise an issue anonymously, call the Compliance and Ethics Hotline.

Compliance and Ethics Hotline 1.800.223.1544
Employees outside of the United States may call collect at 1.704.556.7046

Company Experts

You may contact a Fluor Company Expert who is knowledgeable in each listed area. These Company Experts can be used for clarification on policies, laws, and business practices in their particular area.

If you send an e-mail to the e-mail address that corresponds to the subject area, it will be routed to the company expert in that area. A list of the names of the Company Experts and their phone numbers is also available on www.fdnet.com.

<table>
<thead>
<tr>
<th>Subject Area</th>
<th>E-mail</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agents and Consultants – use outside of United States</td>
<td><a href="mailto:anti-corruption@fluor.com">anti-corruption@fluor.com</a></td>
</tr>
<tr>
<td>Antitrust and Fair Competition</td>
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</tr>
<tr>
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</tr>
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</tr>
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<td>Lobbying, Political Activity and PACs</td>
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<td>Trade Sanctions and Boycotts</td>
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