



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

**OUR BUSINESS AND OPERATIONS**

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

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

KBR ’s capabilities and offerings include the following:

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

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

Table 1.1 is a depiction of where KBR conducted business operations as at December 2022



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

## OUR SUPPLY CHAIN

KBR has over 5,000 vendors/suppliers globally.

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

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

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



## OUR ACTIONS

- KBR acknowledges its corporate responsibility to respect human rights as delineated in the United Nations Guiding Principles on Business and Human Rights. KBR has adopted Human Rights as part of its Governance Corporate Pillar in its sustainability platform. KBR further recognises that modern slavery is a heinous crime that affects communities and individuals across the globe.
- KBR has existing policies and procedures in relation to Human Rights that include acknowledgement of the principles contained in the United Nations Universal Declaration of Human Rights. In 2022, KBR updated its [Global Human Rights policy](#), which sets forth KBR's commitment to ensure its operations and supply chain are free from modern slavery, human trafficking and forced labor, and its commitment that the Company, its subsidiaries, its employees, its suppliers, and its partners will comply with all applicable laws.
- KBR is committed to the fair treatment and protection of migrant workers in accordance with the Dhaka Principles for Migration with Dignity. Furthermore, expects its subcontractors, suppliers and business partners to enact and enforce similar migrant worker policies and protections.
- KBR's [Code of Business Conduct](#), which was revised in April 2023, recognises promoting human rights as its corporate responsibility and expects and requires all of its employees to adhere to the Code of Business Conduct. All employees are required to complete annual ethics training, which includes training regarding human trafficking.
- KBR has established an ethics hotline, where employees and others can report suspected inappropriate or unethical behaviour or human rights abuses, misconduct or violations of our Code of Business Conduct. KBR engages a third-party vendor to manage the ethics hotline, which permits reporters to maintain their anonymity.
- KBR's legal department (through its Business Integrity Team) promptly and thoroughly investigates any report that may include indications of human rights abuses and contacts the appropriate authorities when appropriate.
- KBR's Supplier Code of Conduct affirms that KBR has zero tolerance for child or forced labour and trafficking in persons and requires suppliers to adhere to these principles.
- KBR conducts CTIPS/MSA audits/inspections of certain key subcontractors that include interviews and surveys of subcontractor employees, housing inspections, and prevailing wage reviews.
- KBR conducts restricted party screening on subcontractors and vendors to ensure KBR is not doing business with any entities that are flagged for designated human rights abuses or subject to other watch-lists/sanctions.
- During 2022, KBR delivered its online training programme to 47 'Tier 1' key suppliers across its non-US businesses to raise awareness in identifying and combatting modern slavery in the supply chain. The training achieved a success rate of 58% of those targeted suppliers completing the training.



- A desktop audit was then conducted on the identified 47 suppliers and subcontractors who specifically work with KBR in Tier 1, Tier 2, Tier 2 Watchlist, Tier 3 and Special Case countries (according to the US Department of State).

### **OUR COMMITMENT (2023-2024)**

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

- has begun implementing a strategic plan for conducting physical subcontractor and project site CTIPS/MSA inspections that include checks of housing, passports, and treatment of their employees through random interviews - without subcontract management present. As part of these interviews, employees are asked a series of questions specific to the recruiting process in order to determine if any potential CTIPS/MSA violations have occurred;
- aims to conduct at least 25 in-person inspections at project sites within Europe, the Middle East and Africa;
- will continue to implement the rollout of its online modern slavery training programme;
- is continually reviewing and, where necessary, updating our processes and policies governing modern slavery and people trafficking;
- is continually reviewing and, where necessary, updating our processes for appointing potential supply chain providers;
- is conducting further internal reviews to ensure that our systems contain appropriate processes to protect lesser skilled workers engaged in overseas locations;
- is providing and updating ongoing training materials to be given to all employees and certain key suppliers about modern slavery and trafficking in people, and referring them to our ethics hotline to report any concerns;
- plans to conduct in-person audits of key suppliers;
- is identifying further suppliers and subcontractors that should be audited; and
- will continue to implement its key performance indicators to measure our progress in tackling modern slavery both internally and throughout our supply chain.

As Covid restrictions lifted, onsite physical inspections resumed during 2022 and have since continued apace. Audits are already taking place at projects operated by KBR's Government Solutions International business in seven countries across Europe, the Middle East and Africa, at different levels of the workforce, from site management to chefs and cleaners.

This statement constitutes KBRL's U.K. Modern Slavery Act Statement for the year to the end of December 2022, having been agreed by the Board of Directors of KBRL on 21 June 2023. It is made in



accordance with Section 54(1) of the UK Modern Slavery Act 2015 and is submitted on behalf of the entities listed in the Schedule to this statement.

Signed: 

Dated: 21<sup>st</sup> June 2023

Name: Paul Kahn

Director

Kellogg Brown & Root Limited



## Schedule

### Entities Covered by this Statement

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