Stork and Fluor have always had an absolute determination to do the right thing. Stork has adopted Fluor’s policy on business conduct and ethics. In all of its dealings, Fluor and Stork are committed to unyielding integrity and the highest standard of business conduct. This commitment is integral to our continued success, and we believe it positively impacts our diverse and worldwide suppliers, contractors, customers, employees, and investors, and the communities where we do business.

All of our suppliers and contractors are expected to do what is necessary to understand and comply with these expectations and, in turn, require their suppliers and subcontractors to conform as well. Our mutual success and continuing business relationships depend on it. Stork reserves the right to verify that a supplier or contractor’s business operations meet these expectations. Failure to act in a manner consistent with these expectations may impede our ability to do business together in the future.

Stork expects our suppliers and contractors to maintain and enforce policies requiring adherence to lawful business practices that encompass our expectations, as appropriate. These expectations may occasionally be updated or amended. The most current version is available at www.stork.com.

For questions, comments, or training support about our expectations, please contact our Procurement Department at sts.procurement@stork.com. Also, suppliers and contractors can see how we define these expectations for our employees in our Code of Business Conduct and Ethics, available at www.stork.com.

WWW.STORK.COM

A Fluor Company
HEALTH, SAFETY, AND ENVIRONMENTAL (HSE)
The health and safety of our employees and all personnel associated with our work is our highest priority. Our suppliers and contractors are expected to:
• provide a safe and healthy work environment that supports accident prevention, minimizes exposure to health risks, is in compliance with applicable workers health and safety laws, and minimizes harmful impacts to the surrounding community;
• apply safe work practices (including regulatory and contract-specific requirements) to all their activities and instill safety in every aspect of their work processes and in the attitude and behavior of all their workers; and
• conduct their operations in an environmentally responsible manner and in accordance with applicable environmental laws.

HUMAN RIGHTS AND EMPLOYMENT PRACTICES
Our suppliers and contractors are expected to:
• support and respect human rights and avoid complicity in human rights abuses;
• treat all their workers with dignity, respect, and fairness; and
• conduct all their operations in a socially responsible, non-discriminatory manner and in accordance with applicable laws including those associated with equal opportunity, child labor, forced or compulsory labor, working hours, wages and benefits, freedom of association, data privacy, and harassment-free work environment.

FINANCIAL AND OPERATION CONTROLS
Our suppliers and contractors are expected to:
• keep accurate, complete, fair, timely, transparent, and understandable financial and operational books, records, and accounts, and a system of effective internal controls;
• create, retain, and dispose of business records in accordance with applicable legal and contractual requirements;
• never share nonpublic information relating to Stork or other Fluor companies; and
• comply with insider trading laws including the prohibition against buying or selling securities or advising (e.g., tipping) others to buy or sell securities while aware of material, nonpublic information relating to Fluor or any of its subsidiaries.

CONFLICTS OF INTEREST, GIFTS, ENTERTAINMENT, AND BUSINESS COURTESIES
Our suppliers and contractors, their employees, and their family members must not receive improper benefits through their relationship with Stork or other Fluor companies or allow other activities to conflict with acting in the best interests of Stork or other Fluor companies. Our suppliers and contractors are expected to:
• limit promotional items or entertainment involving our employees to common business courtesies, within accepted business practices and never with the intent to improperly influence a business decision or create a potential conflict of interest or the appearance of impropriety; and
• disclose any potential conflict of interest to Stork for review prior to entering into any business transaction.

IMPROPER PAYMENTS
Stork maintains zero tolerance for bribery and expects our suppliers and contractors to do the same. Bribery is directly or indirectly giving or promising to give anything of value to improperly influence actions of a third party. Bribes may include money, gifts, travel expenses, hospitality, vacations, expenses, below-market loans or products, reciprocal favors, political or charitable contributions, or any direct or indirect benefit or consideration.
TRADE CONTROLS
Our suppliers and contractors are expected to:
• know and comply with the export controls, economic sanctions, and anti-boycott laws applicable to their work with and for Stork and other Fluor companies;
• never participate in boycotts or other restrictive trade practices prohibited or penalized under European Union or United States or applicable local laws; and
• disclose to Stork any apparent conflict between U.S. and applicable local law requirements, such as the laws blocking certain U.S. restrictions adopted by Canada, Mexico, and the members of the European Union.

MONEY LAUNDERING PREVENTION
Our suppliers and contractors are expected to follow applicable laws that prohibit money laundering and require the reporting of cash and other suspicious transactions.

COMPANY RESOURCES
Stork resources include property, assets, intellectual property, and confidential information of all Fluor companies. Our suppliers and contractors are expected to:
• safeguard Stork resources utilized in the course of performing work, to use such resources solely for legitimate business purposes to advance the interest of Stork and other Fluor companies;
• honor the intellectual property rights of Stork and other Fluor companies and the third parties at all times; and
• maintain, handle, and, if applicable, process any confidential information internally and on a need-to-know basis only, with utmost care and in accordance with applicable law.

COMPETING FAIRLY
Stork believes in the free market system where merit, quality, price, and other objective factors determine who succeeds and who fails. Our suppliers and contractors are expected to:
• compete honestly and fairly;
• comply with applicable antitrust and competition laws; and
• never participate in anti-competitive practices such as price fixing or bid rigging.

GOVERNMENT WORK
Our suppliers and contractors who work on projects where government entities or agencies are involved are expected to follow any special rules that apply.
REPORTING CONCERNS

Our suppliers, contractors, and their employees should promptly report any business conduct and ethics concern involving or affecting Stork or any other Fluor company, whether or not the concern involves the supplier or contractor, by contacting one of the following:

1. their Stork representative;
2. Stork’s Procurement Department at sts.procurement@stork.com;
3. the Fluor Compliance and Ethics Hotline by telephone at +1-704-540-2248, or at one of the following toll-free numbers:
   - Australia 1-800-850-107
   - Canada 1-800-223-1544
   - Chile 1230-020-5417
   - China Unicom 10-800-711-0833
   - China Telecom South 10-800-110-0780
   - Colombia 01800-012-9649
   - India 000-800-100-1329
   - Mexico 001-888-818-9370
   - Netherlands 0800-022-0781
   - Philippines 1-800-1-111-0137
   - Poland 0-0-800-111-1756
   - Saudi Arabia 800-844-6984
   - South Africa 0800-980-651
   - Spain 900-98-1171
   - United Arab Emirates 8000-441-6990
   - United Kingdom 0808-234-4002
   - United States of America 1-800-223-1544; or

The Fluor Compliance and Ethics Hotline is a way for our employees, suppliers, contractors, and others to report activities that may involve illegal or unethical conduct or violations of these expectations or Fluor’s Code of Business Conduct and Ethics. A supplier or contractor may also be requested to take such steps as Stork or Fluor may reasonably request to assist in the investigation of any ethics concern involving a Fluor company and the supplier or contractor. Our policy prohibits retaliation against any person reporting an ethics concern. Contact the Fluor Compliance and Ethics Hotline if you feel retaliated against because you reported an ethics concern.