



A summary of Fluor's

# CODE OF BUSINESS CONDUCT AND ETHICS

for non-office based Stork Employees

[WWW.STORK.COM](http://WWW.STORK.COM)



*A Fluor Company*

## INTRODUCTION

STORK HAS ALWAYS BEEN DETERMINED TO DO THE RIGHT THING. We are committed to the highest standards of conduct. This commitment is vital to Stork and your success on this or any future Stork project.

Stork, being a Fluor company has adopted Fluor's Code of Business Conduct and Ethics. This summary describes the parts of Fluor's Code of Business Conduct and Ethics that apply most directly to you as a non-office based Stork employee. You may review the complete Code at <https://www.stork.com/en/about-us/how-we-work> or receive a hard copy from Legal & Compliance. You are responsible for understanding and complying with our entire code.

## SAFE AND SECURE WORKPLACES

### What You Can Expect from Stork

Safety is a core value at Stork. 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. Stork is fully committed to ensuring all employees go home safe after each day or shift. We will provide you with safety information, which may include safety manuals and training appropriate to your job. In addition, our company will provide you with equipment and materials that meet or exceed legally required safety standards.

### What Our Company Expects from You

You are responsible for following safety and security policies and regulations and for helping make the workplace safe for everyone. If you are at all uncertain about the safety rules, have concerns about the materials or the equipment you work with or are aware of a violation of a safety policy, please report this to your supervisor or your HSE Manager. Workplace violence, threats, harassment, threatening remarks and gestures or other disruptive behavior are prohibited.

## EQUAL EMPLOYMENT OPPORTUNITY AND HARASSMENT-FREE WORK ENVIRONMENT

### What You Can Expect from Stork

Stork will not make employment decisions such as hiring, promotion, discipline and termination based on a person's gender, race, color, religion, national origin, marital status, pregnancy, age, disability, veteran status, sexual orientation, or any other legally protected status (for example, affiliations, associations, or beliefs). We strive to create a work environment that is free from harassment, where employees can work in a safe and professional atmosphere, where merit and competence are vital, and diversity and trust are promoted.

### What Our Company Expects from You

As you would like to be treated with dignity and respect regardless of your gender, race, color, religion, national origin, marital status, pregnancy, age, disability, veteran status, or sexual orientation, we expect you to treat all employees equally and fairly as well. Discriminatory or offensive gestures, jokes, slurs or other remarks or forms of harassment that create an offensive work environment will not be tolerated.



## PROTECTING CONFIDENTIAL EMPLOYEE INFORMATION

### What You Can Expect from Stork

Stork often needs to collect, for legitimate business purposes, certain sensitive information about you, such as your hourly rate, home address, Social Security number and other personal data. Our company limits access to this information to those employees who have a business need to use it, such as Human Resources and Payroll. We also comply with all applicable privacy laws.

### What Our Company Expects from You

If you are authorized to have access to sensitive information about your fellow employees as part of your job responsibilities, you are expected to keep all information absolutely confidential and not share it with others.

This policy is not intended to prohibit employees from discussing their own wages or terms and conditions of employment with others.

## CONFLICTS OF INTEREST

### What You Can Expect from Stork

We all have activities outside our jobs. A "conflict of interest" may arise when your personal, social, financial or political activities have the potential of interfering with your loyalty and objectivity to our company. Our company has put in place guidelines to help you determine whether any of your activities may create a conflict of interest, some of which are discussed below.

### What Our Company Expects from You

You are expected to avoid actual conflicts of interest or activities and those that may appear to be a conflict of interest, and therefore could be harmful to our company and to us all. Conflicts of interest can take many forms, including the following examples:

- Having a second job with a competitor, customer or supplier of Stork;
- Using company property or materials, contacts or other resources to start or support your own or another business;
- Having a close relative or significant other who works for Stork and reports (directly or indirectly) to you.

If you feel you may have a conflict of interest, you must talk to your supervisor or your local Human Resources representative for clarification. Conflicts of interest may often be resolved if they are disclosed promptly.

## COMPANY INFORMATION AND RESOURCES

### What You Can Expect from Stork

Stork will provide you with the information you need to do your job well. If you learn about confidential company information, do not disclose this information.

### What Our Company Expects from You

In order to do your job correctly, we expect you to know and follow the policies that apply to your particular job. For example:

**Accurate Books and Records:** You must record and provide all information, including hours worked, in an accurate, truthful, complete and timely manner.

**Company Property, Materials, Computers and E-mail:** We expect you to protect company resources and property. Company resources, such as computers, materials and equipment, should be used only for business purposes. Never use company equipment or facilities for chain letters, advertisements or solicitations. Never send e-mail or visit internet sites that might be considered offensive, defamatory, harassing, obscene or vulgar.

**Protecting Company Information:** As you expect us to respect confidential information about you, we expect you to secure confidential information about our company. Information regarding project scope changes or business plans and records, for example, is confidential. You should not disclose this information to anyone outside our company. Some information, such as confidential employee information, may only be shared on a need-to-know basis. Ask your supervisor, if you have any questions.

## ANTI-BRIBERY AND CORRUPTION

### What You Can Expect from Stork

Stork is committed to countering corruption and bribery. Offering, promising, giving, demanding or accepting bribes is prohibited by our company. Even if our competitors choose to do or win business this way, our company will not.

### What Our Company Expects from You

You must not bribe or make payoffs to anyone, including your supervisors. Likewise, supervisors or any other co-workers must not request or accept bribes or payoffs from you or anyone else. In addition, you may not accept anything of more than nominal value from anyone with whom Stork does business, including our clients, suppliers or contractors.

## REPORTING SUSPECTED VIOLATIONS OF LAW OR POLICY

### What You Can Expect from Stork

It is essential that every employee follows the law and company policies. Any concern about non-compliance should be reported immediately to protect us all. Our company will not tolerate retaliation against any employee who, in good faith, raises concerns about compliance and ethics issues, reports suspected non-compliance, or cooperates with a company investigation.

### What Our Company Expects from You

If you have a question or concern about something you have done or are about to do, or if you are concerned about the actions of our company, your supervisor or a fellow employee, you are expected to express those questions and concerns.

## GETTING HELP

We are all proud to work for Stork. If you have a concern or question about any legal or business conduct issue, there are several ways you can raise it. The most important thing is that you speak up. We will keep your report confidential to the extent that we can.

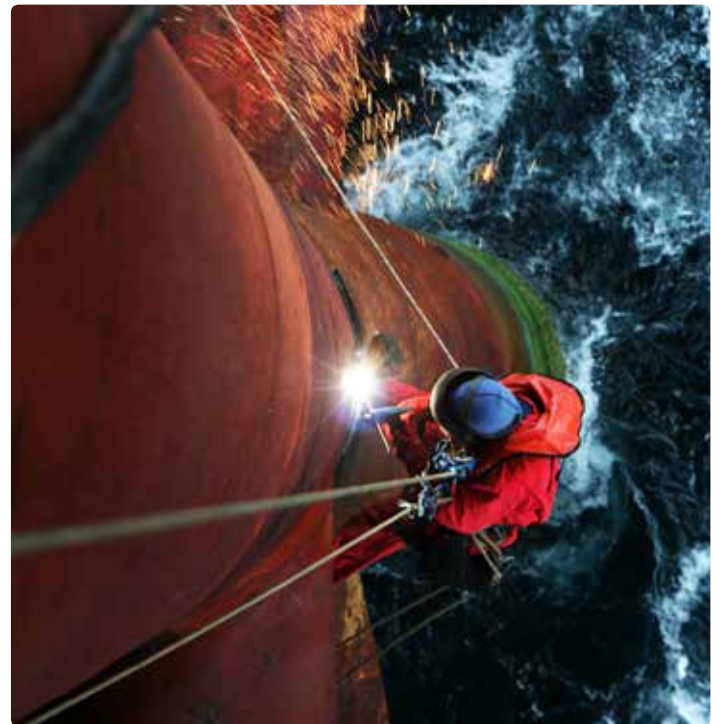
## WHERE TO REPORT YOUR CONCERN

You have several options. Your supervisor is a good place to start with a compliance or ethics issue. You may also get help or advice from:

- Your local Human Resources representative
- Your supervisor's supervisor (and escalate further up the reporting structure, as necessary)
- Stork Legal & Compliance
- Fluor's Compliance and Ethics Hotline

### Retaliation Will Not Be Tolerated

Stork will not tolerate retaliation against any employee who, in good faith, seeks advice, raises a concern or reports misconduct. People who attempt to engage in retaliatory conduct will be subject to disciplinary action, which may include termination. If you suspect that you or someone you know has been retaliated against for raising a compliance or ethics issue, immediately contact your local Human Resources representative or call our Compliance and Ethics Hotline.





#### COMPANY EXPERTS

For any questions, you can contact the Stork Compliance Officer by email ([compliance@stork.com](mailto:compliance@stork.com)) or by phone at +31 88 08 922 17 or contact your local or regional compliance officer. Legal & Compliance can provide clarification on policies, laws and business practices.

#### FLUOR'S COMPLIANCE AND ETHICS HOTLINE

If you are uncomfortable using one of the previously mentioned resources available, or wish to raise an issue anonymously, contact our Compliance and Ethics Hotline by phone at 1.800.223.1544 (within the United States) or collect at 1.704.540.2248 (outside the United States) or online at [www.fluorhotline.com](http://www.fluorhotline.com). The Hotline is operated 24 hours a day, seven days a week, by a third-party company that reports the information you provide to Fluor. Reports may be made in more than 150 languages.

When you call the Compliance and Ethics Hotline, a call specialist will make a detailed summary of your call. The Compliance and Ethics Hotline assigns report numbers so that if you report anonymously, you can still check back to receive a response or provide more information. Of course, giving your name can often help us look into the matter, and Fluor and its subsidiaries have a firm policy against retaliation for raising a good-faith concern.

Speak up and make  
misconduct disappear.

**unethical**  
**unethical**  
**unethical**  
**unethical**  
**unethical**  
**unethical**  
**ethical**

Report unethical activity.  
It's the right thing to do.