



## **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 approximately 38,000 people worldwide with customers in more than 80 countries and operations in over 29 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;
- 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 2024

## About KBR

We deliver science, technology and engineering solutions to governments and companies around the world. KBR employs approximately 38,000 people performing multi-faceted, complex and mission-critical roles in over 29 countries.

With a full portfolio of services, proprietary technologies and expertise, our employees are ready to handle projects and missions from planning and design to sustainability and maintenance. Whether at the bottom of the ocean or in outer space, our clients trust us to deliver the impossible on a daily basis.

- KBR Operations and Joint Ventures
- KBR Corporate Headquarters – Houston, Texas



**38,000**

**EMPLOYEES**

+ 10,000  
unconsolidated  
joint venture  
employees

At the end of  
fiscal 2024



**\$7.7B**

**REVENUE**

in fiscal  
2024



**CUSTOMERS**

in more than

**80**

**COUNTRIES**



**OPERATIONS IN**

**29**

**COUNTRIES**

## Our Global Footprint

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. The map above shows our office and project locations at the end of fiscal 2024.



The ultimate parent company of KBR, which is 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 6,500 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. KBR’s [Global Human Rights Policy](#), sets forth the commitment to ensure its operations and supply chain are free from modern slavery, human trafficking and forced labour, and its commitment that the Company, its subsidiaries, its employees, suppliers, and its partners will comply with all applicable laws. Our human rights vulnerabilities are assessed at the board level and form part of our Enterprise Risk Management process.
- KBR is committed to the fair treatment and protection of migrant workers in accordance with the Dhaka Principles for Migration with Dignity. Furthermore, KBR expects its subcontractors, suppliers and business partners to enact and enforce similar migrant worker policies and protections.



- KBR's [Code of Business Conduct](#) 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 rights.
- 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 indicate human rights violations and contacts the appropriate authorities when necessary.
- KBR's Sustainable Supply Chain Charter aligns suppliers' sustainability performance with the international guidance standard, ISO 20400, setting out the standards and goals to be adopted in the procurement of all goods, services and materials across all KBR activities. This includes commitments in respect of Human Rights, labour rights and fair operating practices that applies to KBR's Sustainable Procurement Policy and its Supplier Code of Conduct. The Charter is supported by annual sample desktop audits across non-US suppliers, ensuring KBR maintains visibility of its supply chains' ethical procurement practices and actions to address the risks of modern slavery.
- KBR's Supplier Code of Conduct reinforces KBR's zero tolerance for child or forced labour and trafficking in persons and requires suppliers to fully comply with these principles.
- KBR has developed digital tools to support supply chain interviews, audits and inspections, with a detailed modern slavery audit guide for staff to use when conducting in-person CTIPS interviews.
- 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.
- In 2024, selected suppliers working with KBR completed KBR's Awareness training on combatting Modern Slavery. All 76 (100%) of the targeted 'Tier 1' suppliers completed the training. KBR has offered modern slavery training across its non-US businesses since 2021, with year-on-year increase in participation.
- A desktop audit was then conducted on 42 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).



- During 2024, KBR conducted 40 full in-person CTIPS interviews at project sites in seven countries across Europe, the Middle East and Africa. Interviews were carried out at all different levels of the workforce from site management to chefs and cleaners. The outcome of these site audits has ensured that KBR's overseas suppliers are compliant with the organisation's rigorous standards.

### **OUR COMMITMENT (2025-2026)**

KBR is undertaking further steps to improve our oversight of our own project sites, 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:

- will continue implementing its 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 further 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 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;
- 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.

With KBR's operations and supply chains located in some high-risk countries and environments, the organisation and its leadership are fully aware of the challenges faced in such circumstances. As a result, the company takes a pro-active stance with educating subcontractors and suppliers operating within these regions, in order to mitigate risk. KBR focuses its efforts on training and



auditing of modern slavery in the supply chain to ensure that its importance is embedded and aligned with our global policies and practices. As our approach to modern slavery auditing matures, KBR will seek enhancements to further automate and digitise supplier engagement in this regard.

This statement constitutes KBRL's U.K. Modern Slavery Act Statement for the year to the end of December 2024, having been agreed by the Board of Directors of KBRL on 2 June 2025. 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: 2 June 2025

Name: Paul O'Shaughnessy

Director

Kellogg Brown & Root Limited



## **Schedule**

### **Entities Covered by this Statement**

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