

NAVEX PRIVACY NOTICE

This NAVEX privacy notice ("**Notice**") explains how Fluor Corporation and/or its relevant subsidiaries and affiliates ("**we**"/"**us**" or "**Fluor**"/"**Company**") process the personal data you submit when you make a report ("**Report Data**") through the Fluor Compliance & Ethics Integrity Portal and Hotline ("**Integrity Portal & Hotline**"). Personal data means any information that relates to you, and allows us to identify you, either directly or in combination with other information that we may hold.

This Notice supplements any other privacy notices that you may have received from us, relating to the processing of your personal data, in particular, if you are a Fluor employee, the "Employee Privacy Notice" available [here](#). For partners, suppliers, and other third parties, please refer to the "Privacy Notice for Partners, Suppliers & Other Third Parties" available [here](#). If you find that there is any discrepancy in relation to the processing of the Report Data between the information provided in these other notices and this Notice, this Notice will prevail. This Notice does not vary or form a part of your employment or other contract with us in any way, and it does not derogate from your rights under local law.

1. General

For Reporting:

You are encouraged to report suspected violations of laws or regulations (including for certain matters specified in an applicable whistleblowing law), the Fluor Code of Business Conduct & Ethics and/or Fluor policies and procedures ("suspected violations") directly to your supervisor or manager, to the supervisor of your supervisor, or to a representative of the Human Resources, Legal or Corporate Compliance Departments, depending on the nature of the possible violation.

Additionally, you may use the Integrity Portal & Hotline to make your report. Anyone, including Fluor employees and Fluor vendors, suppliers and business partners, can report a suspected violation through the Integrity Portal & Hotline.

The Integrity Portal & Hotline is a web and phone-based intake system managed by an independent third-party vendor, NAVEX. The Integrity Portal & Hotline is accessible from anywhere in the world, 24 hours a day, 7 days a week.

For Privacy Questions related to this Notice:

Fluor is the controller of the Report Data, and NAVEX is a processor acting on behalf of Fluor.

You may contact Fluor with any questions relating to this Notice or this service, or to exercise your rights regarding the Report Data, as follows:

Privacy Office, Attn: Chief Privacy Officer
6700 Las Colinas Blvd.
Irving, TX 75039 USA
469-398-7000
chief.privacy.officer@fluor.com

2. Use of the Integrity Portal & Hotline

Use of the Integrity Portal & Hotline is entirely voluntary.

Please be aware that the information you supply about yourself, your colleagues, or any aspect of the Company's operations may result in decisions that affect others. Therefore, we ask that you only provide information that you believe is true. You will not be subject to retaliation from Fluor for any report of a suspected violation that is made in good faith, even if it later turns out to be factually incorrect. Please be aware, however, that knowingly providing false or misleading information will not be tolerated and may be subject to disciplinary action.

The information you submit will be treated confidentially, except in cases where this is not possible because of legal requirements and/or Company procedures governing how to conduct the investigation, in which case the information will be handled sensitively.

You may report anonymously where local law permits. However, keep in mind that the more information you provide, the easier it will be for us to investigate and appropriately respond to your report and to follow up with questions we may have.

In the event the EU Whistleblower Protection Directive and/or any EU country whistleblower protection law applies to your reported concern, you may choose to have this matter handled locally.

3. What personal data and information is collected and processed?

The Integrity Portal & Hotline captures the following personal data and information that you provide when you make a report: (i) your name and contact details (unless you report anonymously); (ii) whether you are employed by Fluor, and if so, by which Fluor entity; (iii) the name and other personal data of the persons you name in your report if you provide such information (i.e.: description of functions and contact details); (iv) a description of the alleged misconduct, as well as a description of the circumstances and a timeline of the incident; and (v) any other personal data and information that you may choose to provide as part of your report.

Note that depending upon the laws of the country in which you are residing, the report may not be made anonymously; however, your personal data will be treated confidentially and will only be disclosed as set out below.

4. Legal Basis for Processing

Fluor will process personal data obtained through the Integrity Portal & Hotline in accordance with applicable laws. Our legal bases for processing your information, which may vary depending on your country and the contents of your report, are as follows:

- Fluor's Legal Obligation: Where we are under a legal obligation to establish a whistleblowing system or are required to undertake any part of the processing of the Report Data as a mandatory legal obligation, we process personal data insofar as this is necessary to fulfil those legal obligations.
- Fluor's Legitimate Interests: Where applicable law permits Fluor to process personal data based on its legitimate interests, such as Fluor's legitimate interests in investigating non-compliance with its policies, seeking to prevent grievances amongst its personnel, managing risk, or seeking to ensure compliance with applicable laws; and
- Consent: Where applicable laws require or permit the processing of personal data with consent, your personal data will be processed on the basis of your consent.

Sensitive Personal Data and criminal offence data

Whilst Fluor is not likely to seek to process any sensitive or criminal offence data, such data (for example, details about substance abuse, discrimination on health grounds or sexual harassment) could be included within the content of a report made using the service. If so, then Fluor will use sensitive personal data only as permitted by applicable laws and, where required, based on your consent.

See also the other notices referenced above for further information about the legal basis of processing personal data.

5. How will the personal data and information be processed after your report and who may access personal data and information?

The purpose for which your personal data, and your report, will be used will be to investigate the issues raised in your report and to take appropriate follow-up action, in accordance with applicable law.

NAVEX has entered into contractual commitments (including a data processing agreement) with Fluor to secure the information you provide in accordance with

applicable law. NAVEX is committed to comply with all relevant data protection laws and maintaining stringent privacy and security practices including those related to notice, choice, onward transfer, security, data integrity, access, and enforcement.

Fluor does not “sell” or “share” the personal data described in this Notice (as those terms are defined under applicable local law).

For the purpose of processing and investigating your report and subject to the provisions of local law, the personal data and information you provide may be accessed, processed and used by the relevant personnel of Fluor, which may include Human Resources, Internal Audit, Legal, Corporate Compliance, management, external advisors (e.g. legal advisors), or, in limited circumstances, by technical staff at NAVEX on a need to know basis only. Those individuals may be located in the United States, the EU, the United Kingdom, the Philippines, India, or other locations where Fluor operates and where Fluor is bound by Binding Corporate Rules (BCRs) for the protection of personal data.

Personal data and information you provide may also be disclosed to the police and/or other enforcement or regulatory authorities. The relevant bodies that receive and process personal data can be located in the US or in another country that may not provide the level of data protection available in the EU. Please refer to the section “Transfers of Personal Data” below for more details.

6. Accessing information concerning the report

Fluor will promptly notify any person who is the subject of a report to the Integrity Portal & Hotline, except where notice needs to be delayed, ensuring the integrity of the investigation and to preserve relevant information.

With some exceptions, the subject of the report may access information concerning the report (with the exception of the identity of the reporter) and request correction of personal data that is inaccurate or incomplete in accordance with applicable law. Similarly, with some exceptions, reporters may also access information about the report and request corrections of their personal data in accordance with applicable law.

7. Retention of the Report and of Your Data

Your report and your personal data will only be retained for as long as they are needed for the investigation of your allegations, for any legitimate follow-up to the investigation, or as otherwise consistent with law and Fluor policy; they will be fully and securely destroyed or erased when and as soon as they are no longer needed for the investigation of the report, or for the purposes of legitimate follow-up to the report (including legal hold or action). However, reports and files on the investigation of reports (or parts of such reports or files) and personal data in such reports or files may be placed in an archive if there is a clear and overriding public interest or legal interest of Fluor in

retaining the data, subject to such restrictions on access to the data aimed at safeguarding the rights and freedoms of the data subjects as may be allowed by applicable law.

8. Your Rights

As for all your personal data, you will have certain rights in relation to your Report Data. Please refer to the “Employee Privacy Notice” or “Privacy Notice for Partners, Suppliers & Other Third Parties” as appropriate for information about your rights. In particular, when we rely on your consent to process your Report Data, you may withdraw your consent at any time.

To exercise any of these rights, please contact us at the details specified above.

9. Transfers of Personal Data

Your report and your details may be held on the secure servers of NAVEX located in the United States; may be transferred to NAVEX sub-processors outside the United States for service and support or translation and interpretation purposes; and may be passed on to the servers of Fluor in United States, subject to appropriate safeguards.

Fluor may process Report Data in any country in which we operate, as permitted by applicable law, which means that your Report Data may be transferred to, stored, and processed in a country that is not regarded as ensuring an adequate level of protection for information under applicable laws (such as those in the EEA or UK). In addition, information located outside of your home country may be subject to access by that country’s government or its agencies under a lawful order.

When Fluor conducts transfers as described herein, we abide by [Fluor’s Binding Corporate Rules](#) and put in place appropriate safeguards (such as contracts or other protections) in accordance with applicable legal requirements. For more information on the appropriate safeguards in place or to obtain a copy of these safeguards, please contact us at the details specified above.