

Global Workplace Privacy Notice

(ENGLISH)

This Privacy Notice (Workplace) (the “Notice”) is provided by the KBR, Inc. subsidiary that is your employer (the “Company”). The Company is a data controller when processing your Personal Data, and if you would like its complete contact information please contact your local HR representative.¹

This Notice describes:

- What Personal Data the Company **collects** about you;
- How the Company **uses** your Personal Data;
- To whom the Company **discloses** your Personal Data;
- Any international **transfers** of your Personal Data;
- How the Company **safeguards** and for how long the Company **retains** your Personal Data;
- Whether the Company engages in **automated decision making**; and
- Your **rights** regarding your Personal Data.

For purposes of this Notice,

- **“Authorized Employees”** refers to employees of a KBR, Inc. subsidiary with a business need to access your Personal Data and who are obligated by agreement or Company policy or procedures to maintain the confidentiality of your Personal Data;
- **“Personal Data”** means any information concerning an identified or identifiable individual; and
- **“Processing”** means any operation with respect to Personal Data, such as collection, retrieval, access, use, disclosure, storage or disposal of Personal Data.

1. Collection, Use and Disclosure of Your Personal Data:

Collection. The Company collects Personal Data from you during the application process, either directly from candidates or sometimes from an employment agency or background check provider, that is integrated into your personnel file upon hire. During your employment, the Company collects Personal Data directly from you as well as from managers, for example, through performance evaluations and other job-related activities. The Company may also collect Personal Data about you from third parties including, but not limited to, your client contacts during the course of your employment. The Personal Data collected includes, but is not limited to, the following:

- **identification data**, such as your name, title, gender, employee/staff ID, date of birth, place of birth, nationality, photo, National Insurance number (or equivalent national identification number), copy of passport, visa, and/or driving license, work permit number, and immigration status;
- **contact details**, such as your work and home addresses, telephone numbers, email addresses, next of kin and emergency contact details;
- **information about your job**, such as work history, job title(s), category and status, work location, job capsule, salary band, employment contract, assigned tasks and

¹ To the extent consistent with applicable law, this notice applies not only to direct employees but also to other authorized agents, such as contractor individuals or student interns, who provide services to KBR.

projects, weekly/working hours, reporting structure, mobility situation and management of career development actions, start and end date, and reason for leaving;

- **recruitment information**, such as copies of right to work documentation, references and other information included in a CV, resumé, or cover letter or received as part of the application process (please also refer to the KBR website for our Privacy Notice (Recruitment));
- **job qualifications**, such as your education, training, professional memberships, certifications, and language(s) spoken;
- **performance and disciplinary information**, such as performance reviews, evaluations and ratings, information about disciplinary allegations, the disciplinary process and any disciplinary warnings, details of grievances, information obtained through the complaint reporting system (including hotline reports) and any outcome;
- **information about your compensation and benefits**, such as your basic salary, bonus and commission entitlements, insurance benefits (including marital status and information about you and your dependents that we provide to the insurer), hours and overtime, absence records, holiday entitlement, accrued salary information, salary and benefit history, and information relating to your pension;
- **payment information**, such as your bank details (for payroll and travel reimbursement purposes only), tax status information, and business travel and entertainment data;
- **equity compensation information**, such as units of stock or directorships held, details of all restricted stock units or any other entitlement to shares of stock awarded, cancelled, exercised, vested, unvested or outstanding in your favor;
- **monitoring information**, such as CCTV footage and other information obtained through electronic means such as swipe card records and vehicle registration details, IT systems usage information related to your use of Company equipment, systems, and other resources and in limited circumstances real-time interception of communications as described in the Information Technology — Security and Acceptable Use Policy;
- **communication details**, such as email content, business letter content, business documents, and chat content.

We may process sensitive Personal Data (also, known as “special category Personal Data”) in limited circumstances with your explicit written consent or as permitted by applicable law without your consent. The categories of sensitive Personal Data that the Company may collect about you, include:

- Criminal conviction information where there is a specific requirement under the law and/or Company policies and procedures to obtain security clearance for a particular job/task/work. The Company will collect criminal conviction information only if that information is substantially job related, and the collection is permissible under applicable law;

- Health information, as required by law or as necessary to manage the employment agreement, including benefits administration, occupational health, fitness for duty, reasonable accommodation/adjustments of disabilities, workers' compensation, sick leave, managing performance and handling complaints/grievances and litigation;
- Disability status and information, on a purely voluntary basis and only where legally permissible, to ensure meaningful equal opportunity monitoring and reporting;
- Race, national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, on a purely voluntary basis and only where legally permissible, to ensure meaningful equal opportunity monitoring and reporting and assist the Company in advancing its Inclusion and Diversity goals and initiatives;
- Religious affiliation, to calculate and deduct the legally required church tax where applicable;
- Union membership status as required by law to ensure benefits, terms of employment, and employment policies comply with the Union's requirements.
- **(Only in workplaces where you clock in and out using your fingerprint):** Biometric data collected by, and stored on, the Company's biometric time clocks. This biometric data is a unique identifier created by applying an algorithm to the distance between points on an employee's fingerprint when the employee places a finger on the biometric time clock. The biometric time clocks do not create or store an image of the fingerprint itself.

Information provided by you to the Company relating to other people (*e.g.* your partner, dependents, etc.) will be processed by the Company in accordance with this Notice. You are responsible for the accuracy of such information and for ensuring that those people are aware of the nature of the information you have provided and the way in which it will be processed by the Company.

1.1 **Use.** The Company uses Personal Data, as necessary, for all purposes related to the creation, administration, and termination of your employment relationship with the Company. These purposes include, but are not limited to, the following:

- For recruitment and/or appointment;
- Determining the terms on which you work for the Company;
- Checking you are legally entitled to work in the location to which you are assigned, including declaring employment to local authorities as required by law;
- Compensating you and, where relevant, deducting pension, tax and insurance contributions;
- Providing benefits to you;
- Liaising with your Pension/Health and Benefit providers;
- Monitoring your use of our information and communication systems to ensure compliance with our IT and other policies;
- Ensuring network and information security, including preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution;
- Conducting data analytical studies to review and better understand employee retention and attrition rates;
- Equal opportunities monitoring and data collection in support of Inclusion and Diversity initiatives;

- Administering the contract (if any) the Company has entered into with you;
- Business management including planning, accounting, auditing and providing your work CVs to Clients for Bid and Proposal work;
- Conducting performance reviews, managing performance and determining performance requirements;
- Making decisions about salary reviews and compensation;
- Assessing qualifications for a particular job or task, including decisions about promotions;
- Gathering evidence for grievance or disciplinary hearings;
- Making decisions about your continued employment or engagement;
- Making arrangements for the termination of the working relationship;
- Education, training and development requirements;
- Ascertaining your fitness to work;
- Managing sickness absence;
- Complying with health and safety obligations;
- Preventing fraud;
- For emergency contact purposes;
- Preparing headcount reports and other reports related to the workforce of the KBR Inc. family of companies;
- Engaging in succession planning;
- Providing employee business contact information to current and prospective customers;
- Providing Help Desk support to employees of the KBR Inc. family of companies worldwide;
- Administering access to the physical facilities of Company;
- Investigating and resolving suspected violations of the Code of Business Conduct (including those reported to the KBR ethics hotline);
- Monitoring and enforcing compliance with internal policies;
- Complying with mandatory government reporting requirements;
- Conducting audits as required by law and Company policy;
- Exercising the Company's rights under applicable law and to support any claim, defense, or declaration in a case or before a jurisdictional and/or administrative authority, arbitration, or mediation panel;
- Meeting legal and regulatory requirements including civil discovery in litigation involving the Company or affiliated companies;

The Company also may use your Personal Data to facilitate administrative functions, including, but not limited to, the management and operation of information technology and communications systems, risk management and insurance functions, budgeting, financial management and reporting, strategic planning, and the maintenance of licenses, permits and authorizations applicable to the Company's business operations.

These uses are: (a) necessary for the Company to fulfill its obligations under its employment agreement with you, such as to administer payroll; (b) required to fulfill the Company's legal obligations and to exercise its rights, such as to accommodate a disability or defend against a legal claim; or (c) necessary for the Company to pursue its legitimate business interests, such as to evaluate job performance or to arrange business. Where permissible or required, the Company may also rely on your consent to the processing of your Personal Data as described in this Notice. Please understand that if you do not

provide your Personal Data, the Company may not be able to provide you with certain benefits of employment. For example, the Company requires your national ID number to process payroll. Furthermore, if you do not provide your Personal Data, the Company may be prevented from complying with its legal obligations, such as maintaining a safe work environment. In general, you are obligated to provide the Personal Data, except where we indicate that certain information is voluntary.

- 1.2 **Data Sharing.** Due to business requirements or contractual or statutory obligations, the Company may need to share your Personal Data with Authorized Third Parties (defined below) for the purposes described above. The Company will provide your Personal Data to an Authorized Third Party that is a data processor only if the Authorized Third Party agrees, in writing, to: (a) process your Personal Data only for purposes stated in this Notice; (b) provide protections for Personal Data similar to those provided by the Company, notably reasonable and appropriate security and confidentiality measures for the Personal Data; and (c) maintain the confidentiality of the Personal Data.

The Company generally will not share your Personal Data with any other third parties unless the disclosure is required by law (for example, to tax authorities), is necessary to protect your health or safety or the health or safety of third parties, is of business contact information for the purpose of developing and maintaining business relationships, and in other limited circumstances where disclosure is legally permitted or required.

“Authorized Third Parties” include third-party service providers under written contract with the Company or any of its affiliated companies and acting under the Company’s direction and instructions, such as auditors, administrative service providers, background check providers, recruiting agencies, travel agencies, and any other entity providing services to the Company.

2. **International Transfers of Your Personal Data:**

Because the Company is part of a global multinational corporation, your Personal Data will be accessed by Authorized Employees of the following KBR entities (collectively, “Group Members”):

- KBR Inc. (the “Parent Corporation”), KBR Services, LLC, KBR Services International, Inc., and KBR Technical Services Inc., all located at Global Headquarters, 601 Jefferson Street, Houston, Texas 77002, which employ some of the group’s senior executives and corporate staff;
- Kellogg Brown & Root (UK) Limited, located at Hill Park Court, Springfield Drive, Leatherhead, Surrey KT22 7NL, which employs some of the group’s senior executives and corporate staff;
- Kellogg Brown & Root Engineering & Construction India Private Limited, 10th Floor, Prestige Polygon, 471 Anna Salai, Nandanam, Chennai, Tamil Nadu 600035, India, which is one of the KBR corporate group’s centralized payroll and benefits service centers;
- Kellogg Brown & Root International, Inc. - Dubai Branch, Rimco Investments Building, 3rd Floor, Media City, Dubai, 120727, UAE Office, which also is one of the KBR corporate group’s centralized payroll and benefits service centers;

- Other members of the KBR corporate group located in a third country, as necessary (for example, if you work directly for that group member or your supervisor works for that group member).

These Group Members will process your Personal Data for the purposes described in Section 1.2, above. The third countries where these Group Members are located may provide a different level of protection for your Personal Data from the level of protection in your country of residence. These Group Members will be permitted to access your Personal Data only if they take steps to provide an adequate level of protection for that information.

If you reside in the European Union, Switzerland, or the United Kingdom (collectively, “European Locations”), the Company has entered into Standard Contractual Clauses with the Group Members to ensure an adequate level of protection for your transferred Personal Data. You can obtain a copy of the Standard Contractual Clauses by submitting a request to DataPrivacy@kbr.com. If you reside in another country that restricts cross-border data transfers, the Company relies on your consent for the transfer of your Personal Data outside your country of residence unless an alternative or additional data protection mechanism is required by applicable law.

The Company and the Group Members will transfer your Personal Data to Authorized Third Parties (see Section 1.3, above), located in third countries, for the purposes described above. Before transferring your Personal Data directly to any Authorized Third Party located in the United States or another third country, the Company, or the Parent Corporation on the Company’s behalf, will confirm that all necessary data transfer requirements have been satisfied, including, where legally required, executing Standard Contractual Clauses approved by the relevant government authority to ensure an adequate level of protection for the transfer of your Personal Data to those third countries. You can obtain a copy of any relevant, Standard Contractual Clauses by contacting DataPrivacy@kbr.com.

3. Security Measures for, and Retention of, Your Personal Data:

The Company has implemented reasonable and appropriate administrative, physical, and technical safeguards for your Personal Data. For example, your Personal Data will be stored on a secure server when in electronic form and in physically secure areas when in paper form. Technical and physical controls restrict access to your Personal Data to employees of the Company with a need to know. Specific details regarding the Company’s data security measures are available by contacting DataPrivacy@kbr.com.

The Company will retain your Personal Data throughout the employment relationship and as long thereafter as is permitted by applicable law. For additional information about the Company’s retention of your Personal Data, please contact DataPrivacy@kbr.com.

4. No Automated Decision Making:

The Company does not make any decisions concerning your employment only by automated means.

5. Your Rights With Respect to Your Personal Data:

Subject to applicable law, you have the right to:

- request access to your Personal Data;

- request that the Company update, correct or delete your Personal Data; and/or
- withdraw your consent to the processing of your Personal Data, in circumstances where it was previously provided.

More on the right to withdraw consent: If the Company requests your consent to process your Personal Data and you do consent, you may use the contact information below to withdraw your consent. Any withdrawal shall not affect the lawfulness of processing based on consent before its withdrawal, and the Company will continue to retain the information that you provided us before you withdrew your consent for as long as allowed or required by applicable law.

Subject to applicable law, your country of residence may also provide you with the right to:

- request restriction of processing of your Personal Data;
- request data portability;
- object to the processing of your Personal Data; and/or
- be informed about the collection and use of your personal data.

More on the right to data portability: Subject to certain limitations, the right to data portability allows you to obtain from the Company, or to ask the Company to send to a third party, a copy of your Personal Data in electronic form that you provided to the Company in connection with the performance of your employment agreement or with your consent.

More on the right to object: You have the right to object to the processing of your Personal Data based solely on the Company's or the Parent Corporation's legitimate interests. If you do object in these circumstances, the processing of your Personal Data will be stopped unless there is an overriding, compelling reason to continue the processing or the processing is necessary to establish, pursue or defend legal claims.

How to exercise these rights: You can exercise your rights by submitting an email to DataPrivacy@kbr.com. The Company will respond to such requests in accordance with applicable data protection law.

If you believe that your Personal Data has been processed in violation of applicable data protection law, you can contact the Company at DataPrivacy@kbr.com. You may also lodge a complaint with the data protection authority where you live, where you work, or where you believe the violation occurred. Employees in the European Union can find contact information for their data protection authority here: https://edpb.europa.eu/about-edpb/board/members_en.