

Compliance Guidance for KBR Charity Golf Tournament

Background

KBR hosts its annual Charity Golf Tournament in Houston, Texas to raise money for local and national charities. Since it started, the KBR Charity Golf Tournament has raised \$6.7 million for over 50 local and national charities.

The event is open to the public. Anyone who signs up to play in the Tournament or donates money to the Tournament is considered a “sponsor.” Sponsorships are available at a variety of contribution levels: (1) teams may register to participate with a contribution of \$5,000, \$10,000, or \$15,000; (2) virtual sponsorships are available for donations of any amount for those who will not be playing in the Tournament; and (3) add-on sponsorships are available at amounts of \$1,000 to \$2,000 to sponsor Drink Carts, a particular Hole on the golf course, or a Hole in One. Hospitality Tents are available at the Tournament for any sponsor with a team (diamond, platinum, gold, or virtual team) or a donation of \$2,500 to the Tournament without any team sponsorships. Any persons or entities choosing to participate, including vendors, will be responsible for their own fees, and participation in the Tournament is in no way related to a participant’s ability to contract with KBR, provide goods and services, or to otherwise do business with KBR.

General Guidelines

Sponsorships are open to the public.

The Tournament is publicized on the Tournament website charitygolf.KBR.com, and through all of KBR’s external communication channels to increase public awareness of the Tournament ensuring everyone has the same opportunity to participate in the event.

Participation is not necessary to and will not affect the ability to contract, or subcontract, with KBR.

All entrants are responsible for paying their own participation fees. KBR has a strict Code of Business Conduct Program and adheres to the highest ethical standards and practices. Participation in this charitable event is in no way related to a participant’s ability to contract with KBR, provide goods and services, or to otherwise do business with KBR. This notice should not be construed as a solicitation but is merely a notice to potential participants of this worthwhile charitable community event. KBR Charitable Foundation, Inc., is a registered 501(c)(3) organization #26-0301417.

All proceeds go to listed and approved local and national charities and do not benefit KBR. The lists of charities are posted on the Tournament website as they are identified.

KBR employees are required to adhere to highest legal and ethical standards, and to follow KBR’s Code of Business Conduct, KBR’s Supplier Code of Conduct, and KBR’s Anti-Corruption Compliance Program (referenced below).

[KBR, Code of Business Conduct \(Page 7\)](#) (prohibiting Improper Payments, including: “a broad range of unlawful payments of money or anything of value that are usually in the nature of

kickbacks, bribes or payoffs made in order to influence favorably some decision affecting a company's business or for the personal gain of an individual.”)

[KBR, Supplier Code of Conduct \(Page 2\)](#) (“Supplier shall not offer, promise, authorize, solicit, pay or give any bribe, kickback or other improper payment of money or anything of value to an employee of KBR to gain any preferred treatment or improper advantage.”).

[KBR, Overview of KBR's Anti-Corruption Compliance Program \(Page 3\)](#) (establishing vetting process for charitable contributions).

Any KBR vendor or supplier should also be aware of these KBR policies, procedures, and programs.

If anyone has any questions about participating in the Tournament, they should contact:

KBR Charity Golf Committee

charitygolf@kbr.com

713-753-GOLF (4653)