

# Modern Slavery Act Statement (FY2023)

This statement reinforces AECOM's effort to combat forced labor, human trafficking, and other forms of modern slavery. This statement addresses AECOM's global policies and practices concerning modern slavery, although some AECOM businesses operate under additional procedures to comply with applicable regulatory requirements.

## Policies

At AECOM, we are committed to doing the right thing in all that we do. We are a signatory to the United Nations Global Compact, and our [Code of Conduct](https://aecom.com/about-us/ethics/code-of-conduct/) (available at <https://aecom.com/about-us/ethics/code-of-conduct/> in multiple languages) further reflects our commitment to ethical business practices. AECOM complies with all applicable laws and regulations regarding human trafficking, forced labor, and other forms of modern slavery. Our Code of Conduct affirms that we do not condone the use of forced labor or human trafficking and emphasizes that we will not knowingly conduct business with subcontractors, business partners, suppliers or other third parties who engage in such activities. AECOM's Code of Conduct applies to all AECOM employees, officers and directors, including our subsidiaries and joint ventures where AECOM has a majority interest. We expect our suppliers, agents, business partners, and sub-contractors will follow similar principles, and we also expect our sub-contractors and other third parties to be aware of and adhere to the ethical standards set out in the Code of Conduct.

In 2020, AECOM adopted a global [Anti-Human Trafficking/Modern Slavery Policy](#) that is published on AECOM's website. The policy prohibits the use of human trafficking, forced labor, and other forms of modern slavery, setting out more explicitly particular prohibited practices. The policy applies not only to all AECOM employees, but also to business partners, sub-contractors, vendors, agents, and other third parties. The policy also addresses U.S. Federal Government contracting requirements for Combating Trafficking in Persons. We also adopted an internal Anti-Human Trafficking/Modern Slavery Procedure that elaborates on our policy and establishes additional requirements for AECOM's business units. While our policy and procedure set the baseline for anti-human trafficking/modern slavery compliance, they also require our local operating groups to adhere to any more rigorous legal requirements imposed in their jurisdictions or by particular clients and allows them to implement additional procedures to address their specific compliance risks or needs.

In 2021, AECOM also published a [Human Rights Statement](#) that summarizes AECOM's commitment to abide by the U.N. Global Compact principles and other international human rights norms, including those related to modern slavery and human trafficking. AECOM's annual [Environmental, Social and Governance \(ESG\) Report](#) further affirms our commitment to human rights compliance and responsible supplier engagement. As part of this commitment, AECOM maintains a risk management framework that is consistent with international standards to inform our bid decisions on projects. The framework includes guidance for identifying and assessing instances where prospective work raises modern slavery concerns. In 2022, AECOM also adopted a [Social Value Policy](#) that further establishes AECOM's commitment to ensure that AECOM is positively impacting our employees, communities, and planet.

## Procurement

AECOM's Global Procurement Policy sets forth our expectations and acceptable practices for the procurement of goods and services on behalf of AECOM, its subsidiaries, clients and third parties. Further, our procurement policies and procedures address our commitment to work collaboratively with and provide support to our internal teams and suppliers in their compliance with applicable human rights, anti-discrimination and global labor standards, including AECOM's commitment to the principles set by the UN Global Compact. To ensure that our suppliers similarly do not condone modern slavery or human trafficking, the activities of our Procurement teams are undertaken in a manner consistent with the AECOM Code of Conduct and our commitment to eliminating third parties from our supply chain who do not share these values.

Our procurement teams employ processes, including supply chain due diligence, that consider the risks faced by their respective operating group. In the UK&I, Middle East, Africa, Europe, and India, the procurement process starts with a detailed third party questionnaire regarding, among other things, the supplier's policies and practices with respect to combating modern slavery, including whether they conduct training and have controls in place to identify and mitigate any suspected slavery or human trafficking practices in their supply chain.

In FY 2023, AECOM adopted a global [Supplier Code of Conduct](#) that replaces our prior regional Supplier Codes of Conduct. The global Supplier Code of Conduct is provided to suppliers as part of the supplier qualification process. It is available in several languages and commits third parties to abide by internationally recognized standards on human rights and labor rights, including those that relate to non-discrimination, working hours and remuneration, child and forced labor prohibitions, and diversity and inclusion.

AECOM has implemented an anticorruption due diligence and continuous monitoring tool that also screens for modern slavery and other human rights allegations and violations. With the introduction of our Coupa Risk Assess platform in the Americas and Canada, AECOM has completed the first phase of implementation of a new procurement process that includes adoption of a global approach to human trafficking and modern slavery due diligence across the company. Implementation in our other international locations is underway. AECOM has also drafted standard clauses related to human trafficking and modern slavery that are part of our contractual terms and conditions used with AECOM suppliers throughout the world.

## **Training**

AECOM requires all its employees annually to complete online training on our Code of Conduct, which prohibits human trafficking and forced labor. The Ethics & Compliance department makes available to all our employees additional training and guidance materials, including “ethics moment” training videos and presentations, practical guidance in easy-to-understand summaries, and Q&A documents on a range of topics.

The mandatory Code of Conduct training for 2021 included a section for AECOM employees across the globe on modern slavery and human trafficking that highlighted the risks of modern slavery and human trafficking in the supply chain and identified some of the warning signs that might indicate that a supplier is engaging in such prohibited practices. In addition, Code of Conduct training for 2019 included a similar human rights segment for our employees in Europe and the Middle East & Africa. Sections on modern slavery and human trafficking will be included in future Code of Conduct training. Additionally, new employee training, new manager training, and some live training sessions during site visits by Ethics and Compliance personnel (including live sessions in the UK, Ireland, and the Middle East in 2023) address modern slavery concerns.

For employee populations that require supplemental training based on unique risks or regulatory requirements, AECOM has added to its training library a more detailed course on modern slavery and human trafficking and a short “ethics moment” that addresses modern slavery risks in the supply chain. Our ESG risk analysis training also includes instruction on identifying and mitigating risks associated with modern slavery concerns. AECOM will continue to evaluate its training requirements each year to ensure an appropriate level of emphasis on human trafficking and modern slavery risks.

## **Measuring our Effectiveness**

We take seriously our responsibility to monitor the effectiveness of our policies in this area. AECOM will investigate all complaints about suspected human trafficking activities relating to AECOM projects or divisions and will take prompt corrective action where warranted. AECOM’s Supplier Code of Conduct also includes a provision allowing AECOM to conduct audits to confirm the supplier’s compliance with the Code.

Additionally, our main operating regions have ethics and compliance committees that meet regularly and report periodically to AECOM’s Global Ethics & Compliance Committee regarding relevant issues. To encourage compliance with our policies, AECOM maintains a hotline 24/7 with extensive language capabilities that allow individuals with concerns to raise concerns, including anonymously where legally permitted. All complaints made through the ethics hotline or other reporting methods are reviewed and investigated. AECOM does not tolerate acts of retaliation against anyone who makes an honest and sincere report of a possible violation, or who participates in an investigation of possible wrongdoing.

This statement is made in accordance with the UK Modern Slavery Act 2015 on behalf of our UK subsidiaries AECOM Limited and AECOM Infrastructure & Environment UK Limited and is updated annually. It has been reviewed and approved by the Board of Directors of AECOM Limited and AECOM Infrastructure & Environment UK Limited on March 19, 2024.



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