

AECOM Modern Slavery Act Statement

1. About AECOM

AECOM is built to deliver a better world. We design, build, finance and operate infrastructure assets for governments, businesses and organizations in more than 150 countries, including the United Kingdom. This statement is made in accordance with the Modern Slavery Act 2015 (the “Act”), and although not required by the Act, AECOM makes this statement on its own behalf as well as on behalf of its UK companies.

2. Our 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 (available at <http://www.aecom.com/about-aecom/ethics/>) further reflects that commitment to ethical business practices. AECOM’s Code of Conduct provides 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 third parties who violate these laws. AECOM’s Code of Conduct applies to all AECOM employees, officers and directors, including those of our subsidiaries and joint ventures, where AECOM has the majority interest. We expect that our suppliers, agents, business partners, consultants and licensees will follow similar principles and we also expect our consultants, subcontractors and other third parties to be aware of and adhere to the ethical standards set out in the Code of Conduct.

We are finalizing a global anti-human trafficking policy to reinforce AECOM’s already established commitment to human rights. This policy will include a prohibition on the use of human trafficking and/or forced labor consistent with our existing Code of Conduct.

In addition to the policies and procedures described in this statement, AECOM complies with all applicable laws and regulations regarding human trafficking, forced labor, and other forms of modern slavery.

3. Procurement

AECOM’s Global Procurement Policy sets high-level expectations and acceptable practices for the procurement of goods and services on behalf of AECOM, its subsidiaries, clients and third parties. Further, our Sustainable Procurement Policy addresses our specific commitment to work collaboratively with and provide support to our internal teams and suppliers in their compliance with all requirements on human rights, discrimination and global labor standards, including AECOM’s commitment to the principles set by the UN Global Compact. In terms of our efforts to ensure that AECOM’s suppliers similarly do not condone modern slavery or human trafficking, the activities of the Supply Chain Management and Procurement teams are undertaken in a manner consistent with the AECOM Code of Conduct and our commitment to eliminating from our supply chain suppliers who do not share these values.

4. Training

AECOM requires that all of its employees complete online training on the Code of Conduct. This training, which is available in 15 languages, covers our prohibition on anti-human trafficking and forced labor. In addition, employees are required to complete training on evolving areas of compliance on a regular basis. Short training videos, webinars and in-person training sessions are important means of reaching as many employees as possible. The Ethics and Compliance intranet pages have practical guidance in easy-to-understand summaries, Q&A documents and scenarios on a wide range of topics.

5. Measuring our Effectiveness

We take seriously our responsibility to monitor the effectiveness of our policies in this area. AECOM investigates complaints about suspected human trafficking activities relating to AECOM projects or divisions and takes prompt corrective action where warranted.

Additionally, each geography and business line has an ethics and compliance committee that reports quarterly to AECOM's Global Ethics & Compliance Committee regarding relevant issues. To encourage compliance with its ethics policies, AECOM maintains a 24-hour, seven-day-per-week hotline with extensive language capabilities open to all employees, contractors and third parties, and individuals with concerns may make complaints anonymously. 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 a good faith report of a possible violation, or who participates in an investigation of possible wrongdoing.

This statement will be reviewed and updated annually.

Signed on behalf of AECOM

A handwritten signature in black ink, appearing to read "M. Burke", written in a cursive style.

Michael S. Burke
Chairman and Chief Executive Officer