
AECOM Modern Slavery Act Statement for Fiscal Year 2019

1. About AECOM

AECOM is built to deliver a better world. 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, including AECOM Limited and AECOM Infrastructure & Environment UK Limited.

As a global company with hundreds of operating entities, AECOM businesses face a variety of risks and regulatory requirements with respect to human trafficking, forced labor, and other forms of modern slavery. Although this statement addresses the policies and practices for all of AECOM, some AECOM businesses operate under additional policies, procedures, or practices in order to comply with applicable regulatory requirements or to address risks unique to their jurisdictions. For example, most of AECOM’s legal entities that operate in the UK are part of the UK and Ireland business (“UK&I”), which is part of the Europe, Middle East, and Africa (“EMEA”) operating group. The UK&I and EMEA businesses have implemented a number of processes to directly address concerns about modern slavery in their supply chains.

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](#) 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. 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.

During the 2019 fiscal year, AECOM began drafting and has subsequently adopted a global [Anti-Human Trafficking/Modern Slavery Policy](#) that is now published on AECOM’s external website. The company also adopted an internal Anti-Human Trafficking/Modern Slavery Procedure that elaborates on the policy and establishes additional requirements for AECOM’s business units. The policy applies not only to all AECOM employees, but also to business partners, sub-consultants, vendors, agents, and other third parties. Implementation and enforcement of this policy and procedure will begin in fiscal year 2020. The policy also addresses U.S. Federal Government contracting requirements for Combating Trafficking in Persons. The policy prohibits the use of human trafficking, forced labor, and other forms of modern slavery, setting out more explicitly particular prohibited practices. In addition, the policy and procedure, while setting the baseline for anti-human trafficking/modern slavery compliance, requires that AECOM businesses adhere to any more rigorous legal requirements imposed by their jurisdictions or by particular clients, and allows AECOM businesses to implement additional policies and procedures to address their specific compliance risks or needs.

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 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.

AECOM continues to explore improving and standardizing the process of onboarding vendors, sub-contractors, and other third parties. However, currently, procurement processes, including due diligence performed on its supply chain, are conducted by procurement teams within the businesses in accordance with procedures that take into considerations the risks faced by each business. In the UK&I, the procurement process starts with a detailed third party compliance questionnaire that includes a series of questions regarding the supplier's policies and practices with respect to combating human trafficking, including whether they conduct training and have controls in place to identify and mitigate any suspected slavery or human trafficking practices in the third party's supply chain. The UK&I and other EMEA businesses require that all suppliers providing project-related professional services read and commit to a [Supplier Code of Conduct](#), which is available on AECOM's external website, during the supplier qualification process. The Supplier Code of Conduct 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.

In 2019, AECOM implemented in some of its higher risk regions a new anticorruption due diligence and continuous monitoring tool that also screens for human trafficking and other human rights allegations and violations. AECOM intends to expand the use of this screening tool in other parts of the organization in 2020. AECOM has also drafted standard clauses related to human trafficking and modern slavery that will be inserted into contractual terms and conditions used with AECOM suppliers throughout the world. The new policy requires that such clauses be included in contracts with third parties.

4. Training

AECOM requires that all employees complete online training on the Code of Conduct and acknowledge they have read and understand the Code of Conduct, which prohibits human trafficking and forced labor. In addition, certain employees are required to complete training on evolving areas of compliance on a regular basis. The Ethics and Compliance intranet pages include additional training and guidance materials, including "ethics moment" training videos and presentations, practical guidance in easy-to-understand summaries, Q&A documents, and scenarios on a range of topics.

The mandatory Code of Conduct training for fiscal year 2019 included a segment for all employees in EMEA that highlights the risks of modern slavery and human trafficking in the supply chain and that trained on some of the warning signs that might indicate a risk that a supplier is engaging in such prohibited practices. 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. AECOM will continue to evaluate its training requirements each year to ensure an appropriate level of emphasis on human trafficking and modern slavery risks.

5. 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. The UK&I Supplier Code of Conduct also includes a provision allowing AECOM to conduct audits to confirm the supplier's compliance with the Code.

Additionally, each geography and business line has an ethics and compliance committee that meets regularly and reports periodically 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 an honest and sincere report of a possible violation, or who participates in an investigation of possible wrongdoing.

This statement will be reviewed and updated annually. It has been reviewed and approved by AECOM's Board of Directors.

Signed on behalf of AECOM



Michael S. Burke

Chairman and Chief Executive Officer