
AECOM Modern Slavery Act Statement for Fiscal Year 2018

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, including AECOM Limited and AECOM Infrastructure & Environment UK Limited.

As a global company with hundreds of operating entities around the world, 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 (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. 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.

A global anti-human trafficking policy that reinforces AECOM’s already established commitment to human rights will be implemented in 2019. This policy will include a prohibition on the use of human trafficking and/or forced labor consistent with our existing Code of Conduct. As with AECOM’s current approach, this global policy will set the baseline for anti-human trafficking compliance, will require that AECOM businesses adhere to any more rigorous legal requirements imposed by their jurisdictions or by particular clients, and will allow 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 has explored implementing a global procurement system for 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 its supply chain. The UK&I business requires that all suppliers providing project-related professional services read and commit to a Supplier Code of Conduct during the supplier qualification process committing them 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 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.

4. Training

AECOM requires that all of its 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, 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. In 2018, AECOM selected a new training vendor for Code of Conduct training and other compliance training. The Code of Conduct training for fiscal year 2019 includes a segment for all employees in EMEA that highlights the risks of modern slavery and human trafficking in the supply chain and that trains 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 investigates complaints about suspected human trafficking activities relating to AECOM projects or divisions and takes prompt corrective action where warranted. The UK&I Supplier Code of Conduct 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.

Signed on behalf of AECOM



Michael S. Burke

Chairman and Chief Executive Officer