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# AECOM Modern Slavery Act Statement for Fiscal Year 2017

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## 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.

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. Please inquire if you have questions about the practices of a particular AECOM business with respect to its program for preventing human trafficking or its compliance with the Modern Slavery Act.

## 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.

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. 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 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.

AECOM is actively exploring implementation of a global procurement system that will standardize the process for onboarding vendors, sub-contractors, and other third parties in order to standardize the due diligence performed on its supply chain. This tool will evaluate suppliers in a variety of areas, including their compliance with international norms regarding

human trafficking and forced labor. AECOM is also drafting standard clauses related to human trafficking and modern slavery to insert 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. AECOM is currently evaluating its training content in this area and is working with an outside vendor to ensure that additional training and reference materials on human trafficking and modern slavery are available to the employee populations that require supplemental training based on unique risks or regulatory requirements.

#### **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 meets three times a year 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 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



Michael S. Burke

Chairman and Chief Executive Officer