

# ANTICORRUPTION POLICY

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# 1.0 PURPOSE AND SCOPE

AECOM succeeds on the merits of its own excellence and is committed to conducting its business ethically, honestly, and with integrity.

Corruption not only violates these ideals, but it is also illegal and prohibited throughout the world. As a U.S.-based company, all AECOM businesses must comply with U.S. domestic anticorruption laws that prohibit bribery within the United States and with the U.S. Foreign Corrupt Practices Act that prohibits corrupt payments outside of the United States. Ethical business conduct may also require compliance with other applicable anticorruption laws, regulations, and conventions, including the U.K. Bribery Act (UKBA); the Criminal Law of the People's Republic of China (PRC Criminal Law); the Organization for Economic Cooperation and Development (OECD) anti-bribery convention; the World Bank Guidelines on Preventing and Combating Fraud and Corruption; and all other applicable laws in every country in which AECOM does business. These will be referred to generically as "anticorruption laws" throughout this policy.

This policy does not describe all of the specific requirements of anticorruption laws or anticipate every possible situation. Rather, the purpose of this policy is to describe general ethical standards that AECOM employees and its third parties must abide by and to provide guidance on detecting and preventing corrupt practices. Please refer to AECOM's Code of Conduct and the [Ethics + Compliance Ecosystem page](#) for additional guidance on complying with these laws and with AECOM's core principles and conduct expectations.

This policy applies to AECOM and its subsidiaries, affiliates, directors, officers, employees, intermediaries, sub-consultants, other contracted third parties, and any other persons performing similar functions on behalf of AECOM worldwide.



Qingchun Plaza, China

## 2.0 POLICY

Any attempt to gain a business advantage through illegal payments, bribes, kickbacks, gifts, or other inducements will not be tolerated. AECOM employees and other persons or entities who are subject to this policy are prohibited from offering, promising, or giving a bribe or illegal inducement to anyone in the course of business. AECOM employees are also prohibited from accepting or agreeing to accept a bribe of any kind.

Additional corrupt activities such as collusion, bid rigging, coercion, and misrepresentation are also prohibited. It is a violation of this policy to alter or falsify books and records in order to conceal corrupt activity.

Any AECOM employee with knowledge of a violation of this policy is required to report it.

AECOM employees are required to complete regularly scheduled anticorruption training as assigned, generally annually as a part of Code of Conduct training. Employees must certify that they have read this policy and that they are acting and will continue to act in compliance with this policy.

# 2.1 PROHIBITED ACTIVITIES

## 2.1.1 BRIBERY

AECOM and other persons acting on behalf of AECOM may not make, offer, or authorize making payments of money or giving anything of value, directly or indirectly, to any government official in order to influence the official's actions, to obtain or retain business, or to secure an improper advantage. A corrupt act does not need to succeed in its purpose; merely offering or promising a bribe is prohibited by AECOM and anticorruption laws. AECOM also prohibits payments to private individuals or entities to obtain business or an improper advantage by corrupt means. Whether involving the public or private sector, payments of bribes or corrupt gestures of any kind are not permitted.

**Anticorruption laws do not just ban direct cash payments, and there is no minimum monetary amount for an improper payment or gesture to be considered a bribe when it is offered or accepted with a corrupt intent. Corrupt inducements can include:**

- Jobs or internships for family members
- Airfare and lodging
- Charitable or political donations
- Frequent or extravagant gifts and/or hospitality
- Gifts and/or hospitality to a friend or relative of a public sector official or AECOM client
- Lavish entertainment and/or tourist travel
- Loans
- Sexually themed entertainment or behavior
- Tickets to sporting events



Maintenance and Operational Support Contract – Afghanistan (MOSC-A)

## 2.1.2 THIRD-PARTY BRIBERY

AECOM prohibits giving or offering money or anything of value to a third party when an AECOM employee involved in the transaction knows or should have known that the money or other thing of value will be given or offered to a government official or private client to obtain an unfair advantage. That means that AECOM employees can be held liable if they consciously disregard the true purpose of a payment, attempt to remain deliberately ignorant of the truth, or fail to follow up on red flags that suggest the possibility of illegal conduct. AECOM can also be held accountable for authorizing or endorsing a payment after the fact where it knew or should have known the payment violates anticorruption laws.

Just like its employees, AECOM sub-contractors, intermediaries, and any other third parties are prohibited from offering anything of value, directly or indirectly, to any other person or entity on behalf of AECOM with a corrupt intent. When AECOM stands to benefit from a third party's interactions with a client, a government agency or official, or any other entity, there is a risk that the third party will make a prohibited promise or payment that will be attributed to AECOM. Regardless of the label used to describe them, the third parties that pose the greatest risk to AECOM and that require more careful screening are those that represent, act jointly with, or act with discretion on behalf of AECOM. Within AECOM, these higher risk business partners are the two categories of third parties typically referred to as Joint Venture Partners or Non-Technical Third Parties. Other labels used to describe Non-Technical Third Parties include:

- Sponsors
- Advocates
- Lobbyists
- Business Development Consultants
- Marketing Consultants
- Sales Agents
- Representatives
- Client Relationship Managers
- Freight Forwarders and Customs Clearance Agents
- Travel Agents

Examples of specific activities these higher risk third parties may undertake on AECOM's behalf include the following:

- Providing marketing, advocacy, or business development services to help AECOM win work
- Obtaining approvals, licenses, or permits on behalf of AECOM or an AECOM client
- Arranging inspections on behalf of AECOM or an AECOM client
- Assisting AECOM with bidding on or negotiating a contract
- Coordinating or facilitating the receipt of payment on AECOM invoices to a client

AECOM employees are prohibited from using any third party to circumvent anticorruption laws or company policies.

## 2.1.3 HIRING GOVERNMENT OFFICIALS AND RELATIVES

Hiring or awarding employment or internships to current or former government employees or to their relatives presents several corruption risks. AECOM employees may not circumvent normal hiring processes or otherwise use their influence to help government officials or their family members get jobs or internships at AECOM or another company. Additionally, current and former government employees may be subject to “revolving door” laws that impose post-government employment restrictions on employees to prevent conflicts of interest and improper business practices. Consult the policy on Hiring Government Officials for more information on complying with “revolving door” laws.

**Human Resources/Talent Acquisition plays a critical role in reducing corruption risks through screening candidates for employment and internships by:**

- Selecting candidates who are suitably qualified for the position and have not been hired in order to obtain or retain business
- Hiring according to the ordinary, approved process
- Recognizing requests from government officials, customers, or AECOM employees to hire a government official or their relative as a potential red flag and then mitigating the risk posed
- Responding to hiring referrals by saying that the application must go through the Company’s ordinary hiring process
- Ensuring that referred candidates do not receive preferential treatment
- Consulting with the senior compliance officer in the operating Group or region when there is uncertainty about the legitimacy of a hiring action



## 2.1.4 FACILITATING PAYMENTS

Facilitating payments, which are small, infrequent payments made to a government official in order to expedite or secure the performance of a routine, non-discretionary action or service, are prohibited. Examples include payments made to an individual government official to expedite or secure issuance of visas, exit stamps for passports, work permits, or tax refunds or small payments made to employees of state-owned utility companies to have service started or restored. Payments made directly to a government agency for expedited service fees in accordance with a government published fee schedule are not prohibited.

The only exception to this prohibition is where there is a clear and present danger of physical harm and the

**When mobilizing or setting up a local office in foreign countries and/or areas with complex requirements, plan ahead on the process for obtaining necessary licenses, permits, and services. Customs delays or difficulties in dealing with local utility companies are not legitimate reasons to make facilitating payments.**

facilitating payment is necessary to prevent immediate harm to an employee. In instances where consultation with in-house counsel is not possible prior to making the facilitating payment, any such payments must be reported to the Legal Department immediately.



AECOM partnered with USAID to implement Afghanistan Stability in Key Areas (SIKA)-East program



2012 Olympics - London

## 2.1.5 COLLUSION/BID RIGGING

Collusion or bid rigging occurs when businesses that would otherwise be expected to compete conspire to affect the prices of goods or services for purchasers who wish to acquire products or services through a bidding process. AECOM, its employees, and others subject to this policy may not collude on project bids or otherwise engage in improper bidding practices such as price fixing, bid suppression, complementary bidding, bid rotation, or market division.

## 2.1.6 MISREPRESENTATION

AECOM and its representatives are prohibited from making false or misleading representations of AECOM's personnel and services to clients or prospective clients, including knowingly misrepresenting the qualifications or experience of personnel or the company or regarding the progress of work. For example, misrepresenting or inflating the qualifications of AECOM personnel in order to win work with a client is prohibited.

## 2.1.7 COERCION

AECOM employees are prohibited from exercising undue influence or improper use of authority, information, physical force, or other such advantage in order to obtain or retain business. Employees should always feel comfortable reporting suspected misconduct for prompt investigation of all allegations of retaliatory acts. Individuals who retaliate against a person for making a report or participating in an investigation will face disciplinary action, up to and including termination of employment.

# 2.2 ACTIVITIES REQUIRING CAUTION

## 2.2.1 CHARITABLE AND POLITICAL CONTRIBUTIONS

Anticorruption laws do not prohibit legitimate charitable contributions or sponsorships. However, a charitable contribution or sponsorship made with the intent of receiving an improper benefit from a government official is prohibited. Moreover, payments must not be made under the guise of charitable contributions as a means to circumvent anticorruption laws.

In the United States, political contributions that are made without an improper purpose and in accordance with law are not prohibited. In other countries, political contributions may be further restricted or prohibited by law or by Group or Geography policies. However, political contributions intended to influence or obtain a specific business advantage from a government official or candidate for political office or as a means of funneling a bribe payment to that individual are prohibited everywhere.

Appropriate due diligence should be conducted with respect to charitable and political contributions to ensure the legitimacy and legality of the contributions. All approvals required by the Enterprise and/or Group/Geography Approval Matrix and by any other policy or process governing political or charitable contributions must be obtained prior to making the contribution.



## 2.2.2 GIFTS AND ENTERTAINMENT

Anticorruption laws typically do not prohibit the giving of gifts, entertainment, and other business courtesies when they are reasonable and customary. However, many countries, government agencies, and commercial enterprises specify limits on the type and value of business courtesies that can be given or received. Gifts or business courtesies may never be provided if they are being offered in exchange for an unfair business advantage or if offering them could create the perception of an improper motive. All gifts must be made in full compliance with local law and with AECOM policies and procedures, as well as the other party's policies and procedures. AECOM employees may not accept a gift from a person or organization involved in an active AECOM procurement. AECOM employees should never affirmatively request a gift from another party. An employee must not accept any gift when doing so could influence or appear to influence his or her actions. Before giving any gift or entertainment, refer to your Group or Geography's policy on gifts and entertainment for further guidance. These policies provide monetary limits or require pre-approval of offers of gifts or entertainment in order to ensure that the gift or entertainment would not be prohibited by anticorruption laws or local laws or regulations.

### Important considerations regarding gifts and hospitality:

- **Accurate recordkeeping.** Payments and expenditures for gifts of any value must be fully and accurately recorded in AECOM's books and records.
- **Frequency.** Multiple gifts given to the same recipient, even if inexpensive, may create the perception that they are being given for an improper purpose. Many government agencies have annual limits on the total value of gifts and hospitality that an employee can receive.
- **Reasonable and appropriate.** Gifts must be reasonable in value and appropriate to the recipient's position and the circumstances. Relevant circumstances include the timing and context surrounding the gift, as well as any past, pending, or future business dealings with the recipient.

## 2.2.3 REIMBURSEMENT OF CERTAIN TRAVEL AND LODGING EXPENSES

It may be permissible to cover certain reasonable and bona fide expenses for government officials or other clients when those expenses are related to sales or marketing efforts or to fulfill contractual obligations. Such expenses could include travel or lodging directly related to product demonstrations or tours of company facilities. However, AECOM must be careful to pay only the expenses legitimately related to the business purpose. For example, paying for sightseeing side-trips, for travel by significant others, or for first-class airfare will rarely, if ever, be permitted. Guidance and approval requirements for such expenses can be found on the Ethics + Compliance Ecosystem page .

## 2.2.4 PAYMENTS PERMITTED BY LOCAL LAW

A payment that would be prohibited by a particular anticorruption law may be permissible if it is lawful under the written laws of the government official's country. However, very few countries have laws that permit payments that other anticorruption laws prohibit, so this scenario would occur rarely, if at all. Prior Ethics + Compliance review and approval are necessary for any such payments.



Washington Monument, Washington D.C.

## 3.1 DEALING WITH GOVERNMENTS AND GOVERNMENT OFFICIALS

Projects involving governmental entities pose the most significant corruption risk to the Company because anticorruption laws and enforcement are largely aimed at combating corruption related to government contracts and governmental officials. In addition to AECOM's prohibition on corrupt payments to any party, our policies are often more restrictive with respect to interactions with governments and government officials than with private companies due to this increased risk.

The definition of government in anticorruption laws covers governmental agencies at every level—national, state or provincial, or local—and in every branch—executive, judicial, legislative, or administrative. Similarly, the term “official” does not just refer to those at the top of the organization; any employee of a government agency, whether paid or not, is considered a government official, regardless of rank, seniority, or position. Publicly funded or state-affiliated entities are typically considered governmental entities, even when the function of the organization does not appear to be governmental in nature. Employees of multi-lateral funding organizations like the World Bank, employees of international organizations such as the U.N., and members of royal families are also considered government officials.

**Representatives of any entity tendering a public works project will almost always be a government official, even if the organization itself does not appear to be a government institution.**

In certain countries, such as China and the many Middle Eastern countries, where state-owned entities are particularly prevalent, due diligence may be required to determine whether the client is a state-affiliated entity since AECOM policies often include different requirements when dealing with governmental entities than with private companies.

# 3.2 DEALINGS WITH INTERNATIONAL FINANCIAL INSTITUTIONS (IFIs)

IFIs, bilateral or multilateral development bank or donor agencies, including entities such as the World Bank and others, often partner with national governments and businesses. Corrupt payments to employees or agents of IFIs are prohibited. Corrupt payments in relation to IFI-funded projects or services are prohibited. IFIs all have their own anticorruption requirements that often introduce obligations beyond those of anticorruption laws.

When engaging on an IFI project, all key personnel shall formally agree to working on the project prior to proposal submission and shall complete training tailored to IFI projects in accordance with the IFI Funded Business Management Policy. The Global IFI Lead shall be informed of any potential key personnel changes.



Cedar Creek Wind Farm – Weld County, Colorado, U.S.



## 3.3 THIRD PARTY ENGAGEMENT AND MONITORING

As discussed above, anticorruption laws prohibit corrupt payments made indirectly through third parties on behalf of AECOM, and AECOM can be held liable for those payments even if it had no actual knowledge of a third party's corrupt act. Therefore, AECOM must take measures to reduce the risk when choosing and entering into an agreement with any third party who will transact business on AECOM's behalf. Through vigilance and interactions with third parties, AECOM's employees are our first line of defense in ensuring that the third parties we work with share our ethical values and operate in a legal and compliant manner. Prior to engaging a third party, AECOM also requires that due diligence (essentially, a background check) be conducted on the third party. Due diligence may be fast, easy, and free or it may be time consuming and involve some cost to the business, but it is an essential component of AECOM's anticorruption compliance program. Such due diligence helps us establish that the third party is reputable and operates ethically.



## 3.3.1 AECOM EMPLOYEES' THIRD PARTY ENGAGEMENT OBLIGATIONS

AECOM employees who are involved in engaging or regularly interacting with third parties must act as the companies "eyes and ears" in identifying and reporting risks or suspicious behaviors. Prior to contracting with any third party, employees both in operational and functional roles need to be alert to red flags of corruption. Many of these warning signs may not be identified through desktop or even enhanced due diligence searches. The presence of a red flag does not automatically disqualify a third party and may be easily explained, but it does indicate a need for further scrutiny and implementation of safeguards against a possible violation. AECOM employees who encounter such red flags are required to satisfactorily address them prior to further engagement and should seek guidance from the Legal Department or Ethics + Compliance when necessary. Some common red flags are identified below.

### RED FLAGS

**When engaging a third party and conducting due diligence, particular attention should be paid to any potential red flags, such as:**

- The transaction involves a country that has a reputation for prevalent corruption.
- The third party has a close family or personal relationship to a government official.
- A client or government official is insistent that the third party become part of the transaction
- The third party objects to anticorruption representations in contractual agreements.
- The third party requests unusual contract terms or payment arrangements, such as a payment in cash, payment in another country's currency, or payment in a third country.
- The third party's requested compensation is disproportionate to the work to be performed.
- The third party provides only vague details about the work to be performed, makes suspicious statements about its method of operating, or is otherwise evasive or secretive about its activities. The third party is in a different line of business than that for which it has been engaged or otherwise appears unqualified for its role.

Before proposing a third party, employees should pay particular attention to the third party's compensation to ensure it is reasonable and justified. Subcontractors, which constitute the majority of AECOM's third parties, should be compensated based on the market value of the services provided. When possible, the selection of subcontractors should be decided through competitive bids or review of multiple quotations. The economic benefit conferred on Joint Venture partners, consortium members, and teaming partners should be proportional to their stake in the JV or teaming agreement or their scope of work. AECOM disfavors paying commissions and other fees to third parties where the amount of payment is contingent on winning a contract and is calculated as a percentage of the value of the anticipated sale or contract. Such contingent fee arrangements make it difficult to determine whether commission payments are justified by the third party's actual work or expertise and increase the probability that funds could be diverted to government officials. While commission rates of less than 10% may be permissible, any request to pay a third party through commissions or other contingent fee arrangements must be approved by the Legal Department or Ethics + Compliance prior to signing a contract with the third party. Additional due diligence or mitigation may be required for such arrangements.

## 3.3.2 DUE DILIGENCE

Prior to engaging or forming a joint venture or other business association with a third party, the due diligence process prescribed for the relevant operating Group or region must be completed and documented. The essential requirement of third party due diligence is to perform a risk-based inquiry to determine whether a prospective third party business partner is honest and can be reasonably expected to refrain from corrupt activities. Effective third-party due diligence should help AECOM reach the following conclusion: "I am confident that my sub consultant, joint venture partner, freight forwarder, etc. does not make corrupt payments, and that our business relationship is a normal, legitimate one. I can explain to, and convince others why my confidence is justified."

Depending on the operating Group or region, AECOM follows two methods of anticorruption due diligence which are summarized briefly below. AECOM employees are required to know which due diligence method is required of them, and are encouraged to visit the Due Diligence page on Ecosystem for guidance and/or to consult with the Legal Department.

Distribution Center, Belgium



## TWO METHODS DEPENDING ON OPERATING GROUP OR REGION

### APAC GREATER CHINA, APAC SOUTHEAST ASIA, APAC INDIA, EMEA MIDDLE EAST AND AFRICA

In some places, AECOM employees must use a prescribed risk assessment tool to evaluate third parties. The tool takes into account the type of relationship, scope of services, country of domicile, work location, and other factors and generates a risk score that automates certain approval processes prior to engagement. Based on the type of engagement and risk score, additional diligence steps prior to engagement may be required, which may include ordering an in-depth due diligence report.

### MANAGEMENT SERVICES, CONSTRUCTION SERVICES, DCS AMERICAS, EMEA UNITED KINGDOM AND IRELAND, EMEA CONTINENTAL EUROPE, APAC AUSTRALIA AND NEW ZEALAND

In other places, AECOM employees are responsible for conducting due diligence through desktop searches, media reports, and/or partnering with Ethics + Compliance for an in-depth review by an external party prior to engagement.

### 3.3.3 CONTRACTUAL REQUIREMENTS

All engagements of third parties must be done through written agreements that must include approved anti-corruption provisions that are appropriate to the risk posed by the engagement. Approved anticorruption contract terms for particular types of engagements can be found on the Ethics + Compliance Ecosystem page or through regional or group Legal counsel.

### 3.3.4 ONGOING MONITORING AND RENEWAL DUE DILIGENCE

After a contract is signed, AECOM must continue to monitor the third party for compliance with its contractual anticorruption obligations and for any red flags suggestive of misconduct. Any red flags identified during the course of the relationship with the third party must be referred to the Legal Department or Ethics + Compliance for advice and analysis, which may require undertaking additional due diligence and, in cases where serious issues are identified, termination of the relationship.

Even if no red flags are identified during the period of performance, due diligence results grow stale after a period of time and must be renewed periodically, typically every three years, to ensure there have been no changes in the third party's ownership, management, history of investigations, allegations of misconduct, or other characteristics that could change the risks related to the third party. More frequent periodic certifications of ethical compliance may also be warranted for certain third parties.

# 3.4 RECORDKEEPING AND ACCOUNTING REQUIREMENTS

Anticorruption laws require maintenance of accurate business records. AECOM and its subsidiaries must:

- Keep accurate books and records that reflect transactions and disposition of assets in reasonable detail. Misleading, incomplete, or false records of any kind are prohibited. No undisclosed or unrecorded funds or accounts may be established for any purpose. These include, but are not limited to:
  - Unrecorded or unreconciled petty cash disbursements or cash advances
  - Real or personal property held by a third party
  - Bank accounts in the name of individuals but containing corporate funds
  - Records that disguise any element of the transaction
  - Indirect payments (payments that will knowingly be made directly or indirectly to a government official)
- Develop and maintain a proper system of internal accounting controls, including periodic audits
- Report any (a) requests for payments that would violate this policy or (b) transactions, past or current, that appear to violate this policy or otherwise appear suspicious in nature.



## 3.5 AUDITING

AECOM personnel conduct periodic audits to help ensure the company's continued compliance with anticorruption laws and this policy. All AECOM employees are required to cooperate fully with authorized auditors.

Contractual provisions requiring third parties to agree that they can be audited for anticorruption compliance (often referred to as audit rights) should be included in third party contracts as often as possible. These contractual clauses are required for certain high-risk relationship types, including for non-technical third parties and certain joint venture partners.

## 4.0 DISCIPLINARY PENALTIES

Governmental investigations of anticorruption laws can result in significant cost and damage to the reputation of a business. Violations by AECOM employees of anticorruption laws and this policy may result in disciplinary measures against the culpable employees, including termination of employment. Violations can also result in significant criminal, civil, and regulatory penalties imposed by governmental entities against those AECOM employees.

# 5.0 REPORTING SUSPECTED VIOLATIONS

Employees are required to report any (a) requests for payments or other consideration that would violate this policy or (b) transactions, whether current or in the past, that appear to violate this policy or otherwise appear suspicious. Employees can report by contacting a supervisor, human resources, in-house counsel, the Ethics + Compliance department, or the AECOM Ethics Hotline.

The AECOM Ethics Hotline is available by email at [AECOMethics.hotline@tnwinc.com](mailto:AECOMethics.hotline@tnwinc.com). In North America, the hotline is available by phone at (888) 299-9602 and online at <https://reportlineweb.com/aecom>. Outside of the North America, the hotline can be reached by dialing the U.S. and 1.770.613.6332, or by visiting <https://iwf.tnwgrc.com/aecom>. Reporters may choose to remain anonymous. AECOM does not tolerate retaliation against anyone who makes an honest and sincere report of a possible violation or who participates in an investigation of possible wrongdoing.

**All reports of suspected anticorruption violations received through the AECOM Ethics Hotline are reviewed and investigated by the Ethics + Compliance department.**



Deep Rock Tunnel Connection – Indianapolis, Indiana, U.S.





#### **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. As a fully integrated firm, we connect knowledge and experience across our global network of experts to help clients solve their most complex challenges. From high-performance buildings and infrastructure, to resilient communities and environments, to stable and secure nations, our work is transformative, differentiated and vital. A Fortune 500 firm, AECOM had revenue of approximately \$18.2 billion during fiscal year 2017. See how we deliver what others can only imagine at [aecom.com](http://aecom.com) and [@AECOM](https://twitter.com/AECOM).

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