

Supplier Code of Conduct

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At AECOM, we're delivering a better world.

AECOM is the world's trusted infrastructure consulting firm, delivering professional services throughout the project lifecycle – from planning, design and engineering to program and construction management. On projects spanning transportation, buildings, water, new energy, and the environment, our public and private sector clients trust us to solve their most complex challenges. Our teams are driven by a common purpose to deliver a better world through our unrivalled technical expertise and innovation, a culture of equity, diversity and inclusion, and a commitment to environmental, social and governance priorities.

The most significant impact we can make to environmental sustainability is through our client work and AECOM's focus on demonstrating leadership through improving our operational sustainability performance. This is demonstrated by our Science-Based Targets Initiative validated emissions reduction targets, which include a near-term goal of reducing our Scope 1, 2 and 3 emissions by at least 50 percent by 2030 and a long-term goal of reducing our total emissions by 90 percent to achieve science-based net zero by 2040. This includes focusing on our supply chain emissions as part of Scope 3, and therefore working with our suppliers to achieve these goals.

AECOM values a fully inclusive and diverse range of suppliers irrespective of size, collectively known as Supplier Diversity and Inclusion or SD&I. SD&I suppliers are described using various terms in programs

across the globe (for example, Small and Medium Enterprises, Small Business Enterprises, Disabled Veteran Business Enterprises, Indigenous Businesses, Minority-owned Businesses). SD&I suppliers play a vital role in supporting the services AECOM provides and we welcome submissions from SD&I suppliers.

AECOM is committed to safeguarding a workplace culture defined by integrity which is paramount to AECOM's continued success. AECOM has a responsibility to make certain we, and those we work with, always provide services ethically in a manner consistent with AECOM's Core Values and in compliance with the law. This Supplier Code of Conduct extends the same principles of operational excellence, safe working practices, ethical and responsible conduct, and fair and respectful treatment of all individuals and suppliers throughout its supply chain.

When contracting on AECOM's Sub-Consultancy Agreements, suppliers are required to confirm they have read and understood and will fully comply with this Code. Suppliers should also communicate these values to their own suppliers.



Purpose and Scope

To provide all AECOM suppliers with direction, information, and expectations on compliance requirements related to:

- Internationally recognized standards on Human Rights and Labor Rights
- Health, Safety, Quality, Environmental and Sustainability matters
- Equity, Diversity & Inclusion
- Sustainable Procurement
- Anti-Corruption and Bribery
- Data Protection & Management Systems

Principles

Suppliers must comply with all applicable laws and regulations of each country in which they operate and in which they provide goods or services to AECOM. Where applicable laws and other standards are higher than those in this Code of Conduct, those laws and standards will take precedence.

Suppliers are expected to be able to demonstrate the use of, and to promote a commitment to, responsible business practices in their own policies, procedures, training, and all related activities underpinned by a culture of continuous improvement.

The AECOM Standard

AECOM expects suppliers to fully comply with this code of conduct, all applicable laws and regulations and best ethical business practices.

With reasonable notice, suppliers may be required to provide evidence of compliance with the obligations set out in this code of conduct, and AECOM reserves the right to further audit suppliers' compliance.

AECOM maintains a robust reporting, investigations, and non-retaliation process. All suppliers are required to report violations of law or this code to AECOM personnel, which will involve the appropriate AECOM department based on the nature of the violation. Third parties may also directly raise concerns by emailing AECOM's corporate ethics & compliance department at hotline@aecom.com. Reporting to AECOM does not relieve the supplier from following its own policies for reporting such allegations. All reported violations are thoroughly investigated and brought to closure.

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 wrongdoing.

Code of Conduct

Human Rights

Consistent with AECOM's [Human Rights Statement](#), suppliers must support, respect, and comply fully with all applicable laws and international human rights standards as well as ensuring they are not complicit in human rights abuses.

Non-Discrimination and Non-Harassment

Suppliers' employees must have equal opportunities and should not be subject to discrimination based on any characteristic protected by applicable law, such as gender, race, religion, age, sexual orientation, disability, nationality and social or ethnic background.

Suppliers' employees should be treated with respect and not be subject to harassment in any way or intimidated either verbally, physically, or mentally. "Harassment" is any action that creates or seeks to create a hostile, intimidating or offensive work environment. Harassing behavior can be sexual or non-sexual in nature. In either case, it has no place at AECOM nor with our suppliers. Harassing conduct can include, but is not limited to:

- Verbal remarks (comments, suggestions, jokes, or requests for sexual favors).
- Pictures (drawings, photographs, or videos).
- Physical behavior (suggestive looks, leering or unwelcomed touching).

Working Hours and Remuneration

Suppliers shall fully comply with all applicable laws, regulations, and industry standards on working hours and pay. Workers shall be paid according to applicable wage laws, including minimum wages, overtime hours and associated benefits. Suppliers will provide employees with reasonable working conditions and reasonable working hours, including breaks, time off and sickness allowance in accordance with local laws.

Forced Labor

AECOM will not tolerate any form of forced labor. Suppliers must comply with AECOM's [Anti-Human Trafficking/Modern Slavery Policy](#) and may not engage in or support any forms of compulsory or

bonded labor in their own organizations or supply chains. Suppliers must not require any form of deposit from its workforce and must ensure all forms of identification (for example, passports, driver's licenses) remain in the possession of its employees.

Child Labor

Suppliers shall not use child labor or be complicit in its use throughout its own suppliers. Suppliers must ensure all employees meet the minimum legal age for employment for all their operations irrespective of location. Suppliers are expected to inform the relevant authorities and AECOM immediately upon finding any evidence of child labor either in their own operations or that of their suppliers.

Right to Work Documentation

Suppliers must confirm employees and prospective employees have the right to work in the country where the Supplier provides goods and services. Suppliers should keep copies of all associated documentation provided by the Employee and ensure it is genuine, unchanged from the original and that the employee has permission to undertake the work being offered.



Anti-Corruption

AECOM's [Anticorruption Policy](#) prohibits bribery or corruption of any form by or of any of its employees, and AECOM expects suppliers to apply the same principles. Suppliers shall comply with all applicable laws and regulations and industry standards related to anti-corruption, including the U.S. Foreign Corrupt Practices Act, the UK Bribery Act 2010, and any local laws prohibiting bribery and other forms of corruption.

Suppliers shall not bribe or attempt to bribe any public official, private person or representative of AECOM or any party, and shall not use illegal payments, bribes, kickbacks, grease payments or other improper inducements to gain an improper advantage or influence any business transaction.

Suppliers may only offer, provide, or accept gifts, meals, or entertainment in accordance with applicable law, and must not offer, provide, or accept gifts, meals, or entertainment if it might be interpreted as a reward for preferential treatment, actual or perceived, or as creating an obligation on the other party. Suppliers may never provide gifts, meals or entertainment to public officials or employees associated with an active procurement on AECOM's behalf or related to AECOM work without prior approval from AECOM.

Suppliers are expected to maintain complete, accurate and honest records, including, but not limited to reports, travel expense reports and other financial documents that may be required. Suppliers are expected to comply with any internal controls for recording and reporting such data.

Conflicts of Interest

Suppliers shall notify AECOM in writing immediately of any actual, perceived, or potential conflict of interest together with recommendations as to how the conflict of interest can be resolved and/or avoided. The Supplier shall provide a mitigation plan for AECOM to review and approve.

Health and Safety

Working Hours and Remuneration

The workplace, irrespective of the Employees' role and place of work (for example, office-based, on-site, remote), will be a safe and healthy place of work in accordance with all applicable laws or local standards. AECOM recognizes that certain roles will have inherent risk, but suppliers must never compromise the safety of its own workforce, AECOM employees or representatives, third parties or the wider public.

When driving on AECOM business, all local laws must be adhered to and employees must be licensed, as well as provided with legal, safe, fit-for-purpose vehicles maintained in accordance with the manufacturer's guidelines. Appropriate health and safety training, information and ongoing support must be made available to all employees. Any health and safety related incidents associated with Supplier or AECOM's work must be promptly reported to AECOM. Any AECOM health and safety requirements or client safety requirements must be followed.

Hazards

Suppliers shall have suitable systems in place for providing workers and any associated contractors with safety information relating to dangerous goods, hazardous materials and hazardous waste. This should include providing training and protecting employees from potential hazards including, but not limited to, raw materials, products, solvents, cleaning agents and waste products.

Emergencies

Suppliers must have in place suitable emergency plans across their operations to minimize the potential impact of any emergency either because of its own operations or that of anyone working on their behalf.



Environmental Sustainability

Suppliers will follow the guidance of AECOM's [Environmental Sustainability Policy](#). Suppliers will comply with all applicable environmental laws and regulations and have in place the correct licenses, permits, registrations and restrictions for their operations.

Suppliers will consider the carbon impact of their business and seek to reduce carbon emissions. Suppliers will share information on a regular basis with AECOM including on their emissions data, targets, and strategies with a view to supporting AECOM's net zero commitment. Suppliers will consider how to reduce generation of waste and water usage as well as measures to promote biodiversity in its operations.

AECOM's commitment to environmental sustainability is embedded within our Management Systems, and employees are proactively encouraged to promote environmental sustainability throughout our operations, those we work with and the wider community. AECOM continuously seeks to reduce emissions, waste, and the use of natural resources through targeted environmental initiatives within its own operations, as part of all design activities and in support of client requirements and the local community. Suppliers are expected to operate, at a minimum, with a similar attitude to all matters relating to environmental management.

Ethical Procurement

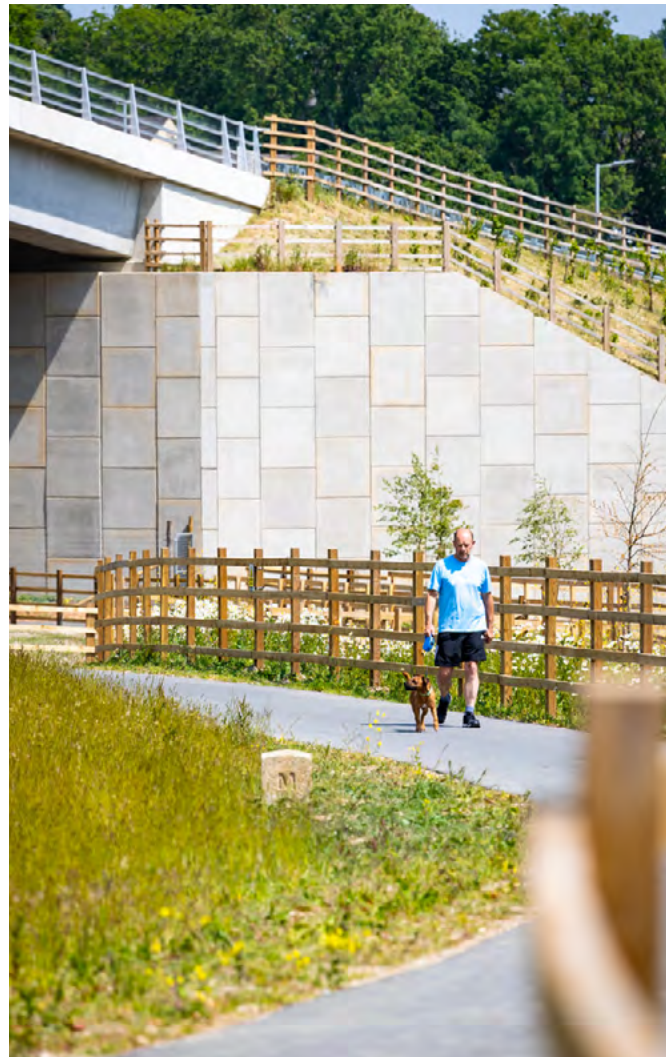
AECOM expects the activities of its suppliers to be based on sound business values, demonstrating an open, ethical and fair approach.

Suppliers are expected to conduct their business in a fair, consistent, open and honest manner allowing competition throughout its suppliers to the same or greater extent that AECOM provides to its suppliers.

International Business

Suppliers must ensure they are aware of and comply with the laws pertaining to the jurisdictions in which they conduct business. Suppliers must fully comply with the export control laws and regulations of the United States and any other jurisdiction in which they conduct business. Suppliers must adhere to economic sanctions laws and regulations, including regulations and economic sanctions administered by the U.S. Office of Foreign Assets Control (OFAC) and the European Union.

Suppliers must not cooperate with boycotts not sanctioned by the United States. This applies to boycotted companies as well as boycotted countries and their nationals. Supplier must report any boycott requests to AECOM if related to AECOM work and to the corresponding authorities where required by law.



Data Privacy and Information Protection

Suppliers shall maintain adequate protection of personal data and information for their operations, any third parties acting on their behalf and AECOM. Details of AECOM's Global Privacy Notice are available here: <https://aecom.com/privacy-policy/>.

Suppliers shall agree to comply with the AECOM Data Protection Agreement and shall not disclose personal data and information to third parties, including, but not limited to its lower-tier suppliers, unless (a) such disclosure is necessary to perform the services, (b) the lower-tier supplier has received the prior written approval of AECOM and (c) AECOM enters into a written, valid, and enforceable agreement with such lower-tier supplier that includes terms that are no less restrictive than the obligations applicable to the Supplier under its agreement. AECOM will, and expects suppliers to, adhere to the principles of The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679). This Regulation covers data protection for all individuals within the European Union (EU) as well as the export of personal data outside the EU.

Outside the European Union, AECOM and its suppliers will comply with the relevant legislation pertaining to the protection of personal data for that jurisdiction. In the United States, AECOM will, and expects suppliers to, adhere to applicable state and federal privacy and data protection laws and regulations to protect personal data and for breach reporting.

Protection of Personal Information

Suppliers will be consistent throughout their operations and be compliant with applicable data protection/ privacy laws for all information, including Personal Information. Supplier must put in place proper organizational structure, processes, and procedures to ensure the protection, confidentiality, integrity, and availability of information against accidental, unauthorized, or unlawful loss, destruction, alteration, disclosure, or use. This may include high level policies, procedures, guidance, and training to cover security while taking reasonable steps to stay current.

In all cases, suppliers must notify AECOM immediately regarding any actual or suspected data breach. This will also include measures being taken by the suppliers, mitigations and outcomes to minimize the effect of the breach and likelihood of a recurrence.

Confidential & Proprietary Information

While doing business with AECOM, suppliers may gain access to AECOM's Confidential and Proprietary Information. Confidential and Proprietary Information includes, but is not limited to, business plans, intellectual property, proposals, trade secrets, technical innovations, designs, inventions, patents, financial information, clients list, and other proprietary information.

Supplier shall cooperate with AECOM in protecting its Confidential and Proprietary Information, including from loss, damage, misuse, and theft. Suppliers shall not use AECOM Confidential and Proprietary Information in any way other than in connection with its duties under any contract with AECOM, and such Confidential and Proprietary Information shall remain the sole property of AECOM. Suppliers may be required to sign AECOM's Non-Disclosure Agreement regarding Confidential and Proprietary Information and may not disclose any AECOM Confidential and Proprietary Information without AECOM's prior written consent.



Management Systems

AECOM's aim is to have all suppliers either certified to, or working towards certification to ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018. Small businesses which have yet to consider implementing certified standards will be expected to provide a documented Project Quality Plan identifying what Quality Procedures will be followed on work carried out for AECOM. If a supplier is not certified or working towards these standards and is not prepared to provide a documented Project Quality Plan, AECOM reserves the right to restrict or cease placement of contracts until the supplier demonstrates that they will work to the relevant AECOM procedures, dependent on the project or service requirements. If a client requests that we work to their standards, then this should be reviewed on a case-by-case basis and their procedures only followed if equivalent to or more stringent than AECOM's.

Where required by a client or AECOM, the Supplier shall implement the requirements of ISO 44001:2017 - Collaborative Business Relationship Management system in collaboration with the AECOM Relationship Manager.

At a minimum, AECOM requires suppliers to be able to demonstrate management commitment to all matters relating to Cyber risk, Health, Safety, Quality, Environment and Sustainability and have robust systems in place to ensure compliance with their own procedures.

Registrations and Certifications

Where required by law, AECOM expects its suppliers to maintain the proper licenses, registrations, certifications, insurances or other formal documentation that formed a material requirement of their appointment. If these requirements lapse or are amended, AECOM expects its suppliers to inform the relevant AECOM contact for each appointment as soon as practicably possible.

Third Party Responsibility

Suppliers must not engage with other third parties on behalf of AECOM or represent AECOM to other third parties without the express permission of AECOM.



References

It is essential suppliers fully understand their commitments to AECOM when agreeing to this Supplier Code of Conduct and prior to providing AECOM with any goods or services. Further guidance and any AECOM policies and procedures referenced below but not publicly linked on www.aecom.com can be requested from your AECOM Contact.

- a. [Code of Conduct – AECOM Global](#)
- b. [Anticorruption Policy – AECOM Global](#)
- c. [Anti-Human Trafficking Policy – AECOM Global](#)
- d. [Human Rights Statement – AECOM Global](#)
- e. AECOM's Corporate Ethics & Compliance Hotline@aecom.com
- f. [Global Privacy Policy – AECOM Global](#)
- g. [Sustainable Procurement Policy – AECOM Global](#)
- h. [Environmental Sustainability Policy – AECOM Global](#)
- i. [Social Value Policy – AECOM Global](#)
- j. [Safety, Health and Environmental Policy – AECOM Global](#)
- k. Quality Policy – AECOM Global
- l. Procurement Policy – AECOM Global
- m. Collaborative Working Policy – AECOM Global
- n. AECOM Data Protection Rider



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