

# Anti-Human Trafficking/Modern Slavery Policy

## Purpose

This policy establishes AECOM anti-human trafficking/modern slavery compliance obligations set out in greater detail in the [Anti-Human Trafficking/Modern Slavery Procedure – AECOM Global](#). Human trafficking/modern slavery includes recruiting, harboring, transporting, provisioning, or receiving persons for labor or services by means of threat, force, deception, fraud, or abuse of power for purposes of exploitation. It affects virtually every country in the world and is a violation of basic human rights.

## Policy

AECOM does not condone and will not tolerate the use of human trafficking or forced labor. This prohibition extends to AECOM and its employees, as well as third parties engaged by AECOM and their respective employees. AECOM will never knowingly conduct business with subcontractors, business partners, suppliers, vendors, or other third parties who violate anti-human trafficking laws. Violations of this policy by AECOM employees may result in discipline, up to and including termination of employment, and violations by third parties may result in exercise of contractual remedies, up to and including termination of the contract.

Any employee who has reason to believe AECOM or any of its third parties is conducting business with an entity engaging in any activity prohibited by this policy must promptly report the suspected misconduct to Management, Human Resources, In-House Counsel, Ethics and Compliance, or the AECOM Ethics Hotline.

Prohibited activities include, among other things, engaging or participating in human trafficking, procuring commercial sex acts, using forced labor, denying employees access to identity or immigration documents, engaging in fraudulent or misleading recruitment practices, using third party recruiters who have not represented that they comply with local labor laws, charging recruitment fees to employees, providing housing that does not meet host country standards, and failing to timely provide employment documents to employees in a language that the employee understands.

All AECOM personnel are responsible for ensuring compliance with this policy and its related procedure. As necessary, AECOM operating units will develop, communicate, and maintain additional anti-human trafficking compliance programs tailored to the needs of specific AECOM projects and businesses. To the extent necessary, these programs shall address requirements for training, certification, due diligence, periodic risk assessments, and statutory reporting.

## Additional Requirements for U. S. Federal Government Contracts

All U.S. federal government contracts have additional anti-human trafficking requirements as set out in the Federal Acquisition Regulation (“FAR”) provisions and FAR supplemental regulations (including the Defense Federal Acquisition Regulation Supplement (“DFARS”). The failure to comply with these federal regulations can lead to contract termination, suspension of payments, loss of award fee, suspension, or debarment and civil or criminal penalties for false statements/claims.

In addition to requirements applicable to all U.S. federal contracts, for certain federal contracts requiring performance outside the U.S. valued at more than \$500,000, AECOM is responsible for developing, communicating and maintaining anti-human trafficking compliance programs, providing training, certifying anti-human trafficking activities when required, conducting periodic risk assessments, investigating complaints, and taking prompt corrective action for human trafficking activities. For certain Defense Department contracts, AECOM must also post and enforce a bill of rights in locations where it is supporting U.S. Armed Forces outside the U.S.

The relevant requirements for U.S. federal contracts and links to the relevant FAR and DFARS sections are included in the [Anti-Human Trafficking/Modern Slavery Procedure – AECOM Global](#). Employees who are responsible for execution of federal contracts shall ensure that they implement these additional regulatory requirements.

## Review and Communication

This policy and subordinate procedures will be regularly reviewed. This policy will be published in the Ecosystem IMS.



September 4, 2023

Sarah Levitt

Date

**Chief Ethics and Compliance Officer**