Jacobs

Modern Slavery Act Statement 2022

This statement is made by the UK business of Jacobs under section 54 of the UK Modern Slavery Act 2015 and by the Australian business of Jacobs under section 14 of the Australian Modern Slavery Act 2018. See "Our Consultation Process" below for a list of relevant subsidiaries.

Our commitment

At Jacobs, we're challenging today to reinvent tomorrow by solving the world's most critical problems for thriving cities, resilient environments, mission-critical outcomes, operational advancement, scientific discovery and cutting-edge manufacturing, turning abstract ideas into realities that transform the world for good. At Jacobs, we do things right. We always act with integrity – taking responsibility for our work, caring for our people and staying focused on safety and sustainability. In alignment with our values, we are committed to respecting the human rights and dignity of individuals within our operations, supply chain and communities where we do business.

Our structure, operations and supply chain

Leveraging a talent force of approximately 55,000, we provide a full spectrum of professional services including consulting, technical, scientific and project delivery for the government and private sector. With \$14 billion in revenue, we operate in over 40 countries and engage over 20,000 suppliers worldwide. Our services fall into our two lines of business: Critical Mission Solutions and People & Places Solutions, as well as a majority investment in PA Consulting. For more information on our company, see our <u>FY21 10-K</u>.

Risks of modern slavery in our operations and supply chains

We are committed to identifying possible modern slavery risks in our operations and supply chains. We conduct supply chain mapping and human rights risk assessments, including periodic support from third-party consultants. As a result, we update and improve our understanding of our highest risk areas for human rights and modern slavery exposure.



We have considered several factors that elevate the risk of modern slavery in our operations and supply chain, including but not limited to:

- Sector and industry risks: as a professional services company that provides solutions to a diverse range of clients, some business engagements identify us with a higher risk sector or industry, such as construction.
- *Geographic risks:* some of the countries in which we operate have higher risks of modern slavery due to poor governance or socio-economic factors.
- *Product and services risks:* some products and services used in our supply chain are identified as higher risk, such as services that involve manual labor or foreign migrant workers.

We are committed to continually improving our approach to identifying modern slavery risks in our supply chain and operations, including further engagement of third parties to conduct risk assessments and provide expertise on enhancing our approach.

Our actions to assess and address modern slavery risks

Policy

Jacobs' <u>Human Rights Policy</u> details our commitment to respecting the human rights and dignity of individuals within our operations, supply chain and communities where we do business. This policy is guided by international principles including those encompassed in the United Nations Guiding Principles on Business and Human Rights, Universal Declaration of Human Rights, International Bill of Rights, and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

Updated in 2022, our <u>Supplier Code of Conduct</u> prohibits the use of any form of forced labor, child labor, human trafficking, and modern slavery. It includes additional requirements including those addressing freedom of association and collective bargaining, recruitment fees, fair wages, non-discrimination, grievance, provision of remedy, and access to personal identification documents. This Supplier Code of Conduct applies to all our suppliers, vendors, and subcontractors.

Due diligence

We conduct due diligence to avoid complicity in human rights abuses, and we seek to avoid causing or contributing to adverse human rights impacts through our own

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activities and business relationships. Supporting our <u>Human Rights Policy</u>, we have integrated a human rights questionnaire into our supplier prequalification process. Enhanced assessment occurs for suppliers based on risk triggers such as geography, activity type, and other risk factors such as employment of migrant workers. We conduct further due diligence based on international indices, media searches, and other indicators of supplier risk.

Contracting and certification

Our standard contracts stipulate that suppliers will comply with all applicable laws, rules and regulations including those related to human trafficking, worker welfare, and modern slavery. We also require that suppliers certify compliance with our <u>Supplier Code</u> <u>of Conduct</u>, including its human rights provisions.

Auditing and assessment

As outlined in our <u>Supplier Code of Conduct</u>, we reserve the right to conduct audits and thoroughly investigate possible non-compliance with our requirements. We strive to be prompt and fair in our investigations and, whenever possible, operate in a spirit of continuous improvement – working with suppliers to implement change within specified timeframes. Any violations of our Supplier Code of Conduct or failure to cooperate in an audit or investigation may jeopardize suppliers' business relationship with us, up to and including termination of contracts.

Training

Jacobs' annual <u>Code of Conduct</u> training is required of all employees and was completed by 99% of our employees in FY21. It includes information on our commitment to respecting human rights and dignity in accordance with the UK and Australian Modern Slavery Acts and the United Nations Guiding Principles on Business & Human Rights, as well as our expectations of employees to act in a manner consistent with our <u>Human</u> <u>Rights Policy</u>. Our training for supply management professionals includes a section on our <u>Supplier Code of Conduct</u>, which includes human rights requirements. More detailed guidance is provided to employees engaged in human rights assessment during supplier prequalification. Additional modern slavery training is under review and being developed for deployment.

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Engagement

Jacobs recognizes the importance of stakeholder engagement to create a more connected, sustainable world. We are a participant in the <u>United Nations Global Compact</u> and are proud to have been a founding member of Building Responsibly, an industry group collaborating to promote the rights and welfare of workers globally. In 2021 we joined <u>BSR</u> (Business for Social Responsibility), via which we engage with third-party experts and engage in cross-industry collaboration to collectively advance our sustainability strategies and impacts, including human rights.

We also support our clients' in reducing human rights and modern slavery risk within their operations and supply chains – including providing guidance and dedicated resources to support the development of worker welfare policies, procedures, and auditing programs.

Our approach to assessing effectiveness

Key performance indicators

We are committed to continual improvement in managing human rights and modern slavery risk in our supply chain. To evaluate our performance, we consider both qualitative and quantitative indicators, including but not limited to those related to supplier qualification and certification, audits and assessments, training, client engagement, and external benchmarking.

As part of Jacobs global transformation activities, we have initiated a company-wide review of our global procurement processes and systems. The outcome of this project will be a more consistent and automated procurement process that further strengthens internal controls while providing consistency and data visibility. We will continue to develop and refine our performance metrics as we advance in this and other improvement activities.

Reporting

We encourage our employees, suppliers and stakeholders to speak up, without retribution, about any concerns regarding human rights and modern slavery in our operations or supply chain. As detailed in our <u>Supplier Code of Conduct</u> and on our <u>website</u>, anyone can submit a report anonymously through the Jacobs Integrity Hotline



at <u>integrity.jacobs.com</u> or by calling +1.844.543.8351. We are committed to investigating reports in an appropriately robust and timely manner.

Our consultation process

We communicated our commitments and actions in combatting modern slavery to the relevant entities in our operations. We have ensured that relevant areas of Jacobs are aware of what actions need to be taken to identify, assess, and address modern slavery risks in our operations and supply chains.

This statement has been made in accordance with the reporting requirements of Clause 54, Part 6 of the UK Modern Slavery Act 2015 and section 16 of the Australian Modern Slavery Act 2018 for the financial year ended 30 September 2021 and applies to the UK business of Jacobs which includes, but is not limited to, the following subsidiaries: Jacobs U.K. Limited, Jacobs Field Services Limited, CH2M Hill United Kingdom, CH2M Hill International Nuclear Services Limited, Halcrow Group Limited, Halcrow International Partnership, Jacobs Clean Energy Limited and Energy, Safety & Risk Consultants (UK) Limited (collectively "Jacobs UK") and Jacobs Group Investments Australia Pty Ltd and Jacobs Australia Pty Ltd.

This statement was approved by Jacobs UK boards on 22 March 2022.

This statement was approved by Jacobs Group Investments Australia Pty Ltd on 23 March 2022.

Patrick Hill, Director, Jacobs Group Investments Australia Pty Ltd

This statement was approved by Jacobs Australia Pty Ltd on 17 March 2022.

Mike Walkington, Managing Director, Jacobs Australia