

2026

Joint Modern Slavery Statement



Contents

1 Introduction.....	3
2 Requirements	
Requirements 1 & 2.....	4
Requirement 3.....	5
Requirement 4.....	6
Requirement 5.....	11
Requirement 6.....	12

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We are focused on upholding the highest ethical standards across our global business, and at a local level in Australia. A fundamental respect for human rights underpins our core values which define how we act and what we aspire to achieve.

”

Introduction

With operations across multiple continents, AECOM thinks and acts globally in all aspects of our business. AECOM and its Australian subsidiaries remain committed to respecting human rights and to identifying, mitigating and eliminating the risks of modern slavery and other unethical practices across our operations and supply chains.

Throughout 2025, AECOM continued to strengthen and streamline its global response to Modern Slavery risks. As Australia transitions into the next phase of its national response to modern slavery, building on the foundations of the National Action Plan to Combat Modern Slavery, it is timely to reflect on the progress AECOM Reporting Entities, and their global counterparts, have made in strengthening our approach across five key focus areas.

a. Prevent modern slavery.

AECOM has enhanced its risk assessment processes and reporting mechanisms to combat the drivers of Modern Slavery and Human trafficking. We continue to equip our people with the knowledge and tools needed to identify and report Modern Slavery risk across our operations. This includes the adoption of a global Anti-Human Trafficking/Modern Slavery Policy, published on AECOM's website, which prohibits specific practices that may increase modern slavery risks. The policy applies not only to all AECOM employees, but also to business partners, sub-contractors, vendors, agents, and other third parties.

b. Disrupt, investigate and prosecute modern slavery.

AECOM has established clear internal reporting pathways and escalation procedures for suspected cases of Modern Slavery, ensuring that these processes operate transparently and responsibly. With AECOM's Coupa Risk Assess platform, we have completed several key phases in strengthening our global procurement processes, embedding modern slavery and human trafficking due diligence across the organisation.

c. Support victims and survivors.

AECOM's Modern Slavery policies and procedures have been developed to protect individuals who may be affected by Modern Slavery, or who report any Modern Slavery concerns. These processes ensure access to support and safeguard individuals from retaliation or adverse consequences.

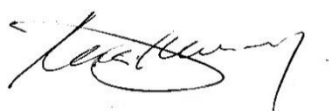
d. Partner

AECOM continues to promote a strong culture of compliance within our supply chains, to promote collective industry action against Modern Slavery. We expect our suppliers, agents, business partners, and sub-contractors to uphold similar principles, and require our sub-contractors to be aware of and comply with the ethical standards set out in AECOM's Code of Conduct.

e. Research

AECOM continues to rely on current research and data to inform decision-making, strengthen risk mitigation strategies, and enhance the quality of its Modern Slavery reporting and training to provide an effective and practical compliance framework.

This Joint Modern Slavery Statement has been prepared and published in accordance with the Modern Slavery Act 2018 (Cth). This Statement has been approved by the Board of Directors for each of the AECOM Reporting Entities listed on page 2 and is hereby signed by a representative member of each Board.



Mark McManmny

(as a director of all the AECOM Reporting Entities)

¹ <https://www.ag.gov.au/system/files/2022-08/national-action-plan-combat-modern-slavery-2020-25.pdf>

Requirements 1 & 2

An overview of the AECOM Reporting Entities

AECOM is an international multidisciplinary design, engineering, consultancy and construction management firm, headquartered in Dallas, Texas. AECOM has offices across the Americas, Europe, the Middle East and Africa, Greater China, Southeast Asia, India, Australia and New Zealand and is a leader in all of the key markets that it serves, including transportation, facilities, environmental, energy, oil and gas, water, government, project/program management and buildings and places.



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The AECOM entities that jointly prepared this report comprise a number of entities in the AECOM group of companies across Australia, which together contributed to AECOM's total annual consolidated revenue for the reporting period. Accordingly, this Modern Slavery Statement is a joint statement made under the *Modern Slavery Act 2018* (Cth) for the financial year ended 30 September 2025 (**Current Reporting Period**) and is submitted on behalf of the following entities:

- a) AECOM Australia Investments Pty Ltd (ACN 163 646 562)
- b) AAIH ANZ Pty Ltd (ACN 600 076 075)
- c) AECOM Australia Group Holdings Pty Ltd (ACN 160 463 883)
- d) AECOM Australia Holdings Pty Ltd (ACN 093 370 695)
- e) AECOM Australia DL Pty Ltd (ACN 145 519 571)
- f) DLA Partners Pty Ltd (ACN 007 369 842)
- g) AECOM Cost Consulting Pty Ltd (ACN 008 657 289)
- h) AECOM Australia Pty Ltd (ACN 093 846 925)
- i) WE Bassett and Partners Pty Ltd (ACN 004 873 634)
- j) Harding Lawson Australia Pty Ltd (ACN 063 854 606) (noting that this entity is dormant)
- k) ENSR Australia Pty Ltd (ACN 060 204 702) (noting that this entity is dormant)

(collectively referred to throughout this Joint Modern Slavery Statement as the '**AECOM Reporting Entities**' or '**AECOM Australia**', whereas references to the global group of companies use the term '**AECOM**').

During the Reporting Period, in Australia, AECOM Australia Pty Ltd and AECOM Services Pty Ltd were the two main operating entities for the region and both companies have their registered office in Fortitude Valley, Brisbane.

In terms of the broader structure of the AECOM Reporting Entities, relevantly:

- a) AECOM Cost Consulting is a subsidiary of DLA Partners Pty Ltd, which is a subsidiary of AECOM Australia DL Pty Ltd.:
- b) ENSR Australia Pty Ltd is a subsidiary of Harding Lawson Australia Pty Ltd.:
- c) AECOM Australia DL Pty Ltd, AECOM Australia Pty Ltd, WE Bassett and Partners Pty Ltd. and Harding Lawson Australia Pty Ltd. are all subsidiaries of AECOM Australia Holdings Pty Ltd.:
- d) AECOM Australia Holdings Pty Ltd is a subsidiary of AECOM Australia Group Holdings Pty Ltd.:
- e) AECOM Australia Group Holdings is jointly held by AAIH ANZ Pty Ltd and AECOM Australia Investments Pty Ltd; and
- f) AAIH ANZ Pty Ltd is a subsidiary of AECOM Australia Investments Pty Ltd, which in turn reports to other entities in the broader AECOM group of companies.

Each of the AECOM Reporting Entities have their predominant business operations and supply chains located in Australia. However, occasionally, the AECOM Reporting Entities are involved in projects located overseas or engage entities in their supply chains that are located or outsource work overseas.

Requirements 3

An overview of the risks of modern slavery practices in the operations and supply chains of the AECOM Reporting Entities

AECOM Australia undertook an assessment of the risks of modern slavery across its operations and supply chains during the current Reporting Period. Due to the nature of AECOM Australia business as a professional services provider, its predominantly Australia based workforce, and the strong regulatory environment governing labour conditions in Australia, the risks of modern slavery in AECOM Australia's direct operations is considered low.

However, AECOM Australia recognises that modern slavery risks may arise in its supply chains, particularly in:

- procurement of goods such as IT equipment, personal protective equipment and office supplies which are often manufactured in higher risk countries.
- the use of subcontractors and downstream consultants, including those that may subcontract or outsource elements of work to offshore locations; and
- service categories such as facilities management, travel, logistics, and other indirect suppliers that rely on lower-skilled or migrant labour.

AECOM conducts ongoing risk assessments using a combination of country and sector-risk indices, and procurement process reviews. Across the 2019–2023 reporting periods, AECOM strengthened its supplier due diligence processes, adopted a Social Value Policy, and implemented a global Supplier Code of Conduct. During the Current Reporting Period, AECOM continued to refine these processes and applied a risk-based approach to identify emerging risks and implement additional measures where appropriate.

Requirements 4

An overview of the actions taken by the AECOM Reporting Entities to assess and address any modern slavery risks



Policies and Procedures

AECOM has implemented a number of key policies and procedures which are relevant to its efforts to identify, mitigate and eliminate modern slavery risks and practices - including the following:

Code of Conduct

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 in multiple languages at <http://www.aecom.com/about-aecom/ethics/>) further reflects our commitment to ethical business practices. AECOM complies with all applicable laws and regulations regarding human trafficking, forced labour, and other forms of modern slavery: our Code of Conduct affirms that we do not condone the use of forced labour or human trafficking and emphasizes that we will not knowingly conduct business with subcontractors, business partners, suppliers or other third parties who engage in such activities. AECOM's Code of Conduct applies to all AECOM employees, officers and directors, including our subsidiaries and joint ventures where AECOM has a majority interest.

We expect our suppliers, agents, business partners, and sub-contractors will follow similar principles, and we also expect our sub-contractors and other third parties to be aware of and adhere to the ethical standards set out in the Code of Conduct.

Anti-Human Trafficking/Modern Slavery Policy

AECOM has adopted a global Anti-Human Trafficking/Modern Slavery Policy that is published on AECOM's website. The policy prohibits the use of human trafficking, forced labour, and other forms of modern slavery, setting out more explicitly particular prohibited practices. The policy applies not only to all AECOM employees, but also to business partners, sub-contractors, vendors, agents, and other third parties. The policy also addresses U.S. Federal Government contracting requirements for Combating Trafficking in Persons. We also adopted an internal Anti-Human Trafficking/Modern Slavery Procedure that elaborates on our policy and establishes additional requirements for AECOM's business units. While our policy and procedure set the baseline for anti-human trafficking/modern slavery compliance, they also require our local operating groups to adhere to any more rigorous legal requirements imposed in their jurisdictions or by particular clients and allows them to implement additional procedures to address their specific compliance risks or needs.

Human Rights Statement

AECOM also publishes a Human Rights statement that summarises AECOM's commitment to abide by the U.N. Global Compact principles and other international human rights norms, including those related to modern slavery and human trafficking. A copy of our Human Rights Statement is accessible here: <http://www.aecom.com/about-aecom/ethics/>.

Requirements 4 cont.

Sustainability Reports

AECOM's annual [Sustainability Report](#) which is available on our website further affirms our commitment to human rights compliance and responsible supplier engagement. As part of this commitment, AECOM maintains a risk management framework that is consistent with international standards to inform our bid decisions on projects. The framework includes guidance for identifying and assessing instances where prospective work raises modern slavery concerns. AECOM also adopted a [Social Value Policy](#) that further establishes AECOM's commitment to ensure that AECOM is positively impacting our employees, communities, and planet.

Whistleblower Policy

AECOM is committed to fostering a culture of ethical behaviour and good corporate governance and recognises that any genuine commitment to instil these values and detect wrongdoing must include a reporting mechanism whereby employees and other persons can report their concerns freely and without fear of reprisal or intimidation. Accordingly, AECOM has an Australian Whistleblower Protection Policy. AECOM has since completed a targeted review of this policy, which was geared towards ensuring the policy remains appropriate and adequately covers the subject matter.

These objectives of the Whistleblower Protection Policy are to:

- a) facilitate an environment that allows all employees, including whistleblowers, the opportunity to speak up with the confidence that their reports will not result in retaliation and victimisation and that if they report anonymously, they will remain anonymous;
- b) provide any person making a report with an understanding of what kind of disclosures will be protected by law and what reports are otherwise protected under AECOM's Code of Conduct and related policies;
- c) provide staff with a clear understanding of how reports will be handled;
- d) protect employees, and other whistleblowers from retaliation and detrimental conduct;
- e) provide support to employees and other whistleblowers throughout the reporting process;
- f) provide a system of fair treatment for employees of AECOM Australia who are mentioned in disclosures of misconduct including whistleblower disclosures,
- g) or to whom such a disclosure relates; and
- h) ensure that any reports are taken seriously and dealt with appropriately.

AECOM Australia considers that this policy is an important part of its strategy to address modern slavery risks in its operations and supply chain because it reinforces to employees that a safe environment exists where they can comfortably report any concerns for further investigation, without fear of reprisal or repercussion.



Procurement

Procurement Policy

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, AECOM's 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 labour 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 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.

Requirements 4 cont.

Due Diligence Tool

Additionally, AECOM has implemented an anticorruption due diligence and continuous monitoring tool that also screens for human trafficking, modern slavery and other human rights allegations and violations.

Subcontractor Pre-Approval Process

Before AECOM Australia engages a subcontractor or a subconsultant to support projects and deliverables, that subcontractor or subconsultant is required to proceed through AECOM Australia's verification and approvals process. As part of that process, each subcontractor or subconsultant entity is required to complete an application form providing certain disclosures and submit that form together with the requested supporting documentation to AECOM Australia for approval.

The subcontractor's application then goes through an approvals process, which includes a review by various departments within AECOM Australia where appropriate, including quality, safety and legal. Each of these reviews focus on different aspects of the application, including relevant experience, insurance coverage and registration status, financial standing and compliance with various legal requirements.

Once the application has been reviewed and assessed by the various departments, the subcontractor is given a rating – either red (do not proceed), yellow (proceed with stipulated conditions) or green (approved) – and is added to AECOM Australia's subcontractor register. Once the entity is added to the register, it undergoes further checks, including ASIC company checks and Dunn and Bradstreet financial checks. As part of this process, AECOM Australia also conducts risk-rating checks on the entity, which include reviewing publicly available information and media reports to identify any indications that the company may be failing to comply with modern slavery obligations or may otherwise present an elevated risk.

All AECOM Australia staff are expected to act consistently with the rating assigned to each subcontractor. Project managers are required to consult the register before each downstream engagement and act consistently with the rating assigned to each subcontractor or subconsultant (including ensuring any conditions attached to engagement are complied with).

In the FY20 Statement, AECOM Australia reviewed and updated its subcontractor and subconsultant approval process to ensure risks of modern slavery in the supply chain could be better identified. In particular, AECOM Australia updated the application form to require subcontractor applicants to make a number of modern slavery specific disclosures, including whether the entity or an entity that it owns or controls:

- a) are covered by the Modern Slavery Act 2018 (Cth) or equivalent legislation;
- b) have policies or procedures in place to identify, investigate, assess and address the risk and any instances of modern slavery within the organisation or supply chain; and
- c) are currently being investigated / prosecuted or have ever been investigated / prosecuted for any breach of any modern slavery or labour laws.

As part of this update, certain parameters were put in place which 'flagged' when a specific review of the Modern Slavery section of an application form was required by a member of AECOM Australia's legal team. When an application is 'flagged' the legal team engages with the applicant, where required, to find out further details and assess the application and the additional information provided as a whole when determining the overall, final rating that is given to the subcontractor or subconsultant and any conditions that might attach to that engagement.

Generally, applications are flagged for legal review where the applicant has disclosed that they do not have specific policies or procedures in place to mitigate against the risks of modern slavery in their operations and / or supply chains.

Requirements 4 cont.

Often in these cases, upon further engagement with the applicant, it becomes clear that the applicant does not have a specific modern slavery policy, but instead has general policies and procedures in place that address the underlying conduct or otherwise serve to mitigate modern slavery risks (for example a Code of Conduct, a procurement policy or procedure or similar). In appropriate cases, the risk is mitigated by requiring the applicant to agree to comply with AECOM's modern slavery clause (see below) or requiring the applicant to comply with relevant AECOM policies and procedures that bind third parties (see above). A large proportion of these applicants are either sole traders or small, locally operated companies that do not meet the reporting threshold under the Modern Slavery Act 2018 (Cth) and provide niche services.

Throughout the 2020 – 2021 reporting period, this form was operationalised. The form was again revised in the previous reporting period to capture ED&I data, to require specific disclosure where applicants subcontract services / works overseas, to require more comprehensive disclosure around compliance with laws and standards (including criminal laws and labour laws and standards) and to implement feedback from clients and stakeholders.

Supplier Code of Conduct

In the FY 2023, AECOM adopted a global Supplier Code of Conduct that replaced our prior regional Supplier Codes of Conduct. The global Supplier Code of Conduct is provided to suppliers as part of the supplier qualification process. It is available in several languages and commits third parties to abide by internationally recognised standards on human rights and labour rights, including those that relate to non-discrimination, working hours and remuneration, child and forced labour prohibitions, and diversity and inclusion.

Update to Downstream Contracts

In the FY20 Statement, the AECOM Reporting Entities detailed that a review of its suite of template downstream contracts was carried out, and a new Modern Slavery specific clause was drafted for inclusion in the template. Amongst other things, this clause requires subcontractors or subconsultants to (including on behalf of entities they own and control):

- a) warrant that they have investigated modern slavery risks in their supply chain and implemented appropriate strategies to remedy those risks;
- b) warrant that they do not engage in and will not engage in any modern slavery practices and are not being or have not been investigated, prosecuted or convicted of or for any actual or suspected breaches of modern slavery laws;
- c) report any risks or instances of modern slavery in their operations or supply chains to AECOM Australia;
- d) provide information or documentation reasonably requested by AECOM Australia to enable AECOM Australia to better understand any reported risks or practice, or to audit the entity's compliance with its obligations under modern slavery legislation; and
- e) indemnify AECOM Australia for any loss and damage caused by a breach of the obligations in the clause and provide AECOM Australia with a right to terminate the agreement if the entity breaches the obligations or warranties in the modern slavery clause.

This clause was operationalised during the previous reporting period and continues to comprise a standard term in all our downstream contracts and a key, specific risk mitigation strategy for AECOM Australia.

Requirements 4 cont.



Other measures

Training for Staff

AECOM requires that all 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 labour. This training is run annually and is compulsory for all employees.

Our mandatory annual Code of Conduct training which must be completed by all employees included sections on modern slavery and human trafficking that highlighted the risks of modern slavery and human trafficking in the supply chain and identified some of the warning signs that might indicate that a supplier is engaging in such prohibited practices. Additionally, new employee training, new manager training, and some live training sessions during site visits by Ethics and Compliance personnel (including live sessions in the UK, Ireland, India the Middle East and Asia) address modern slavery concerns.

For employees that require supplemental training based on unique risks or regulatory or client requirements, AECOM has added to its training library a more detailed course on modern slavery and human trafficking and a short “ethics moment” that addresses modern slavery risks in the supply chain. Our Sustainability risk analysis training also includes instruction on identifying and mitigating risks associated with modern slavery concerns. AECOM will continue to evaluate its training requirements each year to ensure it has an appropriate level of emphasis on human trafficking and modern slavery risks.

Ethics Hotline

To encourage compliance with its ethics policies (including the Anti-Human Trafficking/Modern Slavery Policy), AECOM maintains a 24-hour, seven-day-per-week hotline with extensive language capabilities that allow individuals with concerns to raise concerns, including anonymously where legally permitted. 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 an honest and sincere report of a possible violation, or who participates in an investigation of possible wrongdoing.

Requirements 5

Assessing the effectiveness of the risk mitigation actions

There are a number of different ways the AECOM Reporting Entities assess the effectiveness of the processes set out in this Joint Modern Slavery Statement. For instance:



- a) AECOM takes our responsibility to monitor the effectiveness of our policies and procedures in this area seriously. Accordingly, we regularly review the sufficiency of our existing policies and procedures to determine whether any updates need to be made or whether new policies or procedures need to be drafted to address other matters.



- b) AECOM Australia's subconsultant and subcontractor engagement (including the approvals component and the contracting component) are also subject to regular review and adjustment as appropriate. Feedback is also sought from key stakeholders and is considered as part of this review process.



- c) AECOM investigates all complaints about suspected modern slavery or human trafficking activities relating to AECOM projects or divisions, including any complaints made through the Ethics Hotline, and will take prompt corrective action where warranted.



- d) AECOM's main operating regions have an ethics and compliance committees that meets regularly and report periodically to AECOM's Global Ethics & Compliance Committee regarding relevant issues.

Requirements 6

The AECOM Reporting Entities' consultation process

In addition to the above, AECOM Australia has also formulated a Modern Slavery group, which is comprised of representatives from different departments, who meet to discuss various modern slavery initiatives on behalf of the AECOM Reporting Entities, including identifying future activities that AECOM Australia should explore across the next reporting period.

Group members include representatives from the operations, corporate responsibility, quality, legal and procurement departments and regularly consult with representatives from AECOM's global ethics and compliance team. Further, AECOM Australia works with a number of key representatives across different departments covering the AECOM Reporting Entities when:

- a) seeking to identify steps to be taken to address the modern slavery legislative requirements;
- b) implementing the identified steps over the previous reporting period; and
- c) preparing this Joint Modern Slavery Statement.

Finally, the Directors of each of the AECOM Reporting Entities have reviewed and approved this Joint Modern Slavery Statement.

About AECOM

AECOM is the global infrastructure leader, committed to delivering a better world. As a trusted professional services firm powered by deep technical abilities, we solve our clients' complex challenges in water, environment, energy, transportation and buildings. Our teams partner with public- and private-sector clients to create innovative, sustainable and resilient solutions throughout the project lifecycle — from advisory, planning, design and engineering to program and construction management. AECOM is a Fortune 500 firm that had revenue of \$16.1 billion in fiscal year 2025. Learn more at [aecom.com](https://www.aecom.com).

