

2024

# Joint Modern Slavery Statement

# Contents

<b>1</b>	Introduction	1
<b>2</b>	Requirements	
	Requirements 1 & 2	2
	Requirement 3	4
	Requirement 4	5
	Requirement 5	11
	Requirement 6	12

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**AECOM is built to deliver a better world and is focused on upholding the highest ethical standards in all that we do and a fundamental respect for human rights underpins our core values which define how we act and what we aspire to achieve.**

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# Introduction

With operations across multiple continents, AECOM thinks and acts globally in all aspects of our business. As a result, 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. Through the measures set out in this Modern Slavery Statement, AECOM and its Australian subsidiaries continue to prioritise and focus on identifying, mitigating and eliminating the risks of modern slavery and other unethical practices in our operations and supply chains.

In the Good Practice Toolkit: Strengthening Modern Slavery Responses,<sup>1</sup> the authors observe that businesses' adoption of the below elements is crucial to the effectiveness of modern slavery legislation in Australia:

- (a) a robust and systematic approach to human rights due diligence
- (b) equitable partnerships with suppliers.

AECOM recognises the importance of these elements and has continued to focus on these areas in our approach to modern slavery prevention. Year on year, AECOM has committed to the implementation, review and refinement of processes that provide meaningful protections against modern slavery risks. By strengthening our due diligence systems, investigating new technology, and implementing effective training, we have created adaptable processes that help underscore our global human rights strategies. We continue to work meaningfully with suppliers to foster respectful working relationships underpinned by mutual commitment to human rights and that set clear and transparent guidelines for the work we undertake together. While the risks of modern slavery are still prevalent in the global marketplace, AECOM remains vigilant and continues to take steps to address these important issues.

This Joint Modern Slavery Statement has been prepared and published in accordance with the *Modern Slavery Act 2018* (Cth). This Joint Modern Slavery 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 McManamny**

(as a Director of all the AECOM Reporting Entities)



**Chris Tatam**

(as a Director of AECOM Australia Pty. Ltd.)

<sup>1</sup> Justine Nolan, Shelley Marshall, Vikram Bhakoo, Martijn Boersma, Freya Dinshaw, Sarah Knopp, Fiona McGaughey, Amy Sinclair, page 23. Available at: <https://www.humanrights.unsw.edu.au/research/testing-effectiveness-Australia-modern-slavery-act>.

## 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.



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 2023 (**Current Reporting Period**) and is submitted on behalf of the following entities:

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

**Requirements 1 & 2 cont.**

In Australia, AECOM Australia Pty Ltd and AECOM Services Pty Ltd are 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.

### Requirement 3

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

AECOM Australia considered its operations and supply chain practices, including its existing policies and procedures, and identified that there was a lower risk of modern slavery in its local operations due to AECOM Australia being a professional services company, the types of services it provides, the fact that it rarely relies on overseas outsourcing, the protective strength of Australia's labour and other laws and AECOM Australia's strong culture of compliance with those laws and standards.

During the 2019 – 2020 reporting period, following a review of AECOM Australia's supplier engagement and procurement processes, AECOM Australia identified a number of additional measures that could be implemented to bolster and fortify its existing procurement processes to enable it to better manage the risk of modern slavery in its supply chains, particularly where its downstream contractors are located or outsource work overseas. These measures are set out in the AECOM Reporting Entities' Modern Slavery Statement for the 2019 – 2020 reporting period (**FY20 Statement**). During the 2020 – 2021 reporting period the key focus was on taking steps to operationalise all of those measures and to evaluate their effectiveness. These measures are set out in the AECOM Reporting Entities' Modern Slavery Statement for the 2020-2021 reporting period (**FY21 Statement**).

During the Current Reporting Period, the AECOM Reporting Entities have continued to assess their operations and supply chain practices on an ongoing basis, and have taken a risk-based approach to refine the existing procedures or implement further measures that appropriately and effectively address any additional areas of risk identified.



## Requirement 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

In 2020, AECOM 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.

**Requirement 4 cont.****Human Rights Statement**

In 2021, AECOM also published 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/>

**ESG Reports**

AECOM's first annual Environmental, Social and Governance (ESG) Report was published in November 2021. During the previous reporting period, AECOM published our second annual ESG report, which further affirms our commitment to human rights compliance and responsible supplier engagement. The 2022 ESG report is accessible through the following link: <https://investors.aecom.com/esg>

As part of this ESG strategy, AECOM maintains an ESG risk 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.

During the previous reporting period, AECOM also adopted a Social Value Policy that further establishes AECOM's ESG strategy to ensure that AECOM is positively impacting our employees, communities, and planet. The 2023 version of the Social Value Policy can be found at this link: <https://investors.aecom.com/esg>

**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. During the previous reporting period, AECOM 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;



**Requirement 4 cont.**

- (f) provide a system of fair treatment for employees of AECOM Australia who are mentioned in disclosures of misconduct including whistleblower disclosures, or to whom such a disclosure relates; and
- (g) 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.

**Due Diligence Tool**

AECOM has completed implementation of a new 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,

**Requirement 4 cont.**

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.

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 noted that it 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. 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.

**Requirement 4 cont.**

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 Current Reporting Period, AECOM adopted a global Supplier Code of Conduct that replaces 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.

**Requirement 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.

The mandatory Code of Conduct training for 2021 included a section for all AECOM employees 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. Specific sections on modern slavery and human trafficking will be included in future annual training.

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 ESG 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.

**Requirement 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 also 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.

**Requirement 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 world's trusted infrastructure consulting firm, delivering professional services throughout the project lifecycle – from advisory, 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 unrivaled technical and digital expertise, a culture of equity, diversity and inclusion, and a commitment to environmental, social and governance priorities. AECOM is a Fortune 500 firm and its Professional Services business had revenue of \$14.4 billion in fiscal year 2023. See how we are delivering sustainable legacies for generations to come at [aecom.com](http://aecom.com) and [@AECOM](https://twitter.com/AECOM).

