

# Modern Slavery Act Statement 2025

This Modern Slavery Act Statement reinforces Jacobs' efforts with respect to modern slavery, including to satisfy reporting obligations in Australia and the United Kingdom (U.K.). Jacobs refers to Jacobs Solutions Inc. and each of its direct and indirect subsidiaries, including Jacobs U.K., Jacobs Australia (each as defined below).

This modern slavery statement is made for the financial year ended 27 September 2024 individually by each of:

**Jacobs U.K. Limited ("Jacobs U.K.") as a "Commercial Organization" in accordance with the reporting requirements of Section 54, Part 6 of the U.K. Modern Slavery Act 2015 on behalf of:**

- Jacobs U.K. Limited
- CH2M HILL United Kingdom
- Halcrow International Partnership

**Jacobs Group Investments Australia Pty Ltd ("Jacobs Australia") as a "Reporting Entity" in accordance with the reporting requirements of section 16 of the Australia Modern Slavery Act 2018**

Our report does not cover subsidiary companies which we have sold or otherwise disposed of during the Reporting Period. However, in the Reporting Period prior to that sale or disposal, we applied the same general actions and approach described in our report to these companies as well.

## **Our commitment**

At Jacobs, we're challenging today to reinvent tomorrow – delivering outcomes and solutions for the world's most complex challenges. With approximately \$12 billion in annual revenue and a team of almost 45,000, we provide end-to-end services in advanced manufacturing, cities & places, energy, environmental, life sciences, transportation and water. From advisory and consulting, feasibility, planning, design, program and lifecycle management, we're creating a more connected and sustainable world. 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**

Jacobs Solutions Inc. is a publicly held corporation, headquartered in the U.S. and incorporated in the State of Delaware and is the parent entity of its direct and indirect subsidiaries.

Jacobs operates around the world and includes a range of locally incorporated entities, including Jacobs U.K. and Jacobs Australia. We operate in more than 40 countries and engage 20,000+ suppliers worldwide. Our services to our markets fall into the following two operating segments: Infrastructure & Advanced Facilities and a majority investment in PA Consulting Group Limited (PA Consulting). For more information on Jacobs, see our Annual Report on [Form 10-K](#) for the fiscal year ended September 27, 2024, our Quarterly Report on [Form 10-Q](#) for the fiscal quarter ended December 27, 2024, and our other filings with the U.S. Securities and Exchange Commission. Our operations are located primarily in North America, Europe, the Middle East and Asia Pacific, with detailed location information available on [Jacobs.com](#).

## **Risks of modern slavery in our operations and supply chains**

Jacobs is committed to identifying possible modern slavery risks in our operations and supply chains. We conduct human rights risk assessments, including periodic support from third-party consultants who have supported risk assessment efforts. As a result, we update and improve our understanding of our risk areas for human rights violations and modern slavery exposure.

Modern slavery risk factors considered in the evaluation of Jacobs' operations and supply chain, include but are not limited to:

- *Sector and industry risks:* as a professional services company that provides solutions to a diverse range of clients, in some countries some business engagements identify us with a higher risk sector or industry.
- *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:* in some countries 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.

Jacobs U.K. and Jacobs Australia primarily provide professional services to clients in their respective countries. The supply chain for Jacobs U.K. and Jacobs Australia primarily consists of the following categories:

- corporate suppliers which may include external advisors, cleaning services, training providers, general goods and services for use in day-to-day operations;
- IT suppliers such as providers of IT equipment; and
- project subconsultants to provide professional services.

Together with Jacobs, Jacobs U.K. and Jacobs Australia are committed to continually improving their approach to identifying modern slavery risks in their supply chains and operations around the globe, including further engagement of third parties to conduct reviews and provide expertise on enhancing our approach.

## **Our actions to assess and address modern slavery risks**

### ***Policies in relation to slavery and human trafficking***

Jacobs' [Human Rights Policy](#) details our commitment to respecting the human rights and dignity of individuals within our operations, supply chain and communities where we do business around the world. 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 2023, Jacobs' [Supplier Code of Conduct](#) prohibits the use of any form of modern slavery, including forced labor, child labor, and human trafficking. 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. During onboarding, our suppliers confirm they are in compliance with our Supplier Code of Conduct.

### ***Due diligence***

Jacobs conducts 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 activities and business relationships. Supporting our [Human Rights Policy](#), we have integrated a human rights questionnaire into our supplier pre-qualification process.

Enhanced assessment occurs for suppliers based on risk triggers, which can include geography, activity type and other risk factors. This due diligence is performed at the pre-contractual certification stage and then bi-yearly or yearly depending on risk assessment.

#### *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 [Supplier Code of Conduct](#), including its human rights provisions.

#### *Auditing and assessment*

As outlined in Jacobs' [Supplier Code of Conduct](#), 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*

All employees must complete Jacobs' Living Our Values training, and the 'We Do Things Right' module includes specific information on Jacobs' [Code of Conduct](#). It includes information on our commitment to respecting human rights and dignity in accordance with the U.K. 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 [Human Rights Policy](#). Our training for supply management professionals includes a section on our [Supplier Code of Conduct](#), which includes human rights requirements.

Jacobs is committed to continuously improving modern slavery training offerings for employees. Through our unique employee learning platform – e3: engage. excel. elevate. – we have several on-demand training modules available addressing the topic of modern slavery. The topics include modern slavery general concepts, how it manifests in the supply chain, as well as how to identify and report such cases. The training modules' difficulty level ranges from beginner to intermediate, reflecting the complexity of the subject.

In Australia, we engaged a third party to produce modern slavery training videos; the videos are accessible to all Jacobs employees with a lens of Australian regulations and drivers.

### *Engagement*

Jacobs recognizes the importance of stakeholder engagement to create a more connected, sustainable world. We are a [participant](#) in the [United Nations Global Compact \(UNGC\)](#) and participated in the UNGC Business & Human Rights Accelerator Program to assess Jacobs' most salient human rights risks (including modern slavery risks) and further expand human rights due diligence across our value chain.

In 2025, we continued our partnership with [BSR](#) (formerly, 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 are proud to have been a founding member of *Building Responsibly*, an industry group collaborating to promote the rights and welfare of workers globally. BSR provides executive leadership and secretariat support for *Building Responsibly*.

We respond to client surveys in relation to Jacobs' policies and processes and share strategies and control measures to reduce human rights and modern slavery risks within our clients' operations and supply chains.

## **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 global indicators, including but not limited to those related to supplier qualification and certification, audits and assessments, training, client engagement, and external benchmarking.

Specifically, we track the volume of suppliers being processed and audited, which incorporates the percentage of suppliers screened by our Ethics and Compliance team. We also monitor the number of suppliers that have been identified to have no certification for modern slavery risks.

The percentage of procurement staff and all other employees who have received training and awareness on modern slavery is tracked. This tracking includes the number

of employees trained in risk assessment for modern slavery and their understanding of modern slavery.

### ***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 Jacobs [Code of Conduct](#), [Supplier Code of Conduct](#), our [Whistleblower Protection policy](#), and on our [website](#), anyone can submit a report anonymously through the Jacobs Integrity Hotline at [integrity.jacobs.com](https://integrity.jacobs.com) or by calling 844.543.8351 (U.S.), 1.800.316.728 (Australia) and 0808.234.6029 (U.K.). 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 Jacobs group of companies, inclusive of Jacobs U.K. and Jacobs Australia. We have ensured that relevant areas of Jacobs' operations are aware of what actions need to be taken to identify, assess, and address modern slavery risks in our operations and supply chains.

### **Approval**

This statement was approved by Jacobs Group Investments Australia Pty. Ltd on 20 March 2025.

**Kelly Maslin**

Director, Jacobs Group Investments Australia Pty Ltd Australia