

# Supplier Code of Conduct

## 1. Introduction

- a. AECOM values a fully inclusive and diverse range of Third Parties irrespective of size. Small and Medium Enterprises (SME) play a vital role in supporting the services AECOM provides and we welcome submissions from SMEs.
- b. AECOM is committed to safeguarding a workplace culture defined by integrity which is paramount to AECOM's continued success. AECOM has a responsibility to make certain we and those we work with always provide services ethically and in compliance with the law.
- c. AECOM Ethics & Compliance programme promotes this culture, provides training and tools to help our employees understand their responsibilities in terms of being consistent with AECOM Core Values.
- d. When contracting on AECOM's Sub-Consultancy Agreements, suppliers are required to confirm they have read and understood and will fully comply with this Code.
- e. This Supplier Code of Conduct extends the same principles to suppliers given AECOM's commitment to operational excellence, applying safe working practices, ethical and responsible conduct, fair and respectful treatment of all individuals and suppliers throughout its supply chain.
- f. Suppliers are expected to support and adhere to all aspects of this Code of Conduct and communicate these values throughout their own suppliers.

## 2. Purpose and Scope

To provide all AECOM suppliers with direction, information and expectations that AECOM requires suppliers to be in accordance with including: -

- Internationally recognised standards on Human Rights and Labour Rights
- Health, Safety, Quality and Environmental matters
- Diversity & Inclusion
- Sustainable Procurement
- Anti-Corruption and Bribery
- Data Protection & Management Systems

## 3. Principles

- a. Suppliers will comply with all applicable laws and regulations of each country in which they operate and provide goods or services to AECOM. Where applicable or other standards are higher than those in this Code of Conduct, those standards will take precedence.
- b. Suppliers are expected to be able to demonstrate the use of and promote a commitment to responsible business practice in their own policies, procedures, training and all related activities underpinned by a culture of continuous improvement.

## **4. Monitoring against AECOM Standard**

- a. Complying with this Code of Conduct is one of the criteria used when AECOM is selecting and evaluating its suppliers. AECOM expects suppliers to fully comply with all applicable laws and regulations and employ ethical business practices at all times.
- b. Upon request and by giving reasonable notice, AECOM will expect to be provided with evidence that compliance with the obligations set out in this Code of Conduct are being adhered to and reserves the right to audit such evidence.
- c. AECOM maintains a 24-hour, seven-days per-week hotline open to all employees, contractors and third parties with extensive language capabilities. All calls or emails are thoroughly investigated and brought to closure and can be made anonymously. AECOM does not tolerate acts of retaliation against anyone who makes a good faith report of a possible violation, or who participates in an investigation of possible wrongdoing.
- d. Contractors and Third Parties are encouraged to report any possible violation of this code within their own company using the AECOM Hotline number +1-770-776-5645 (toll free dialling requires operator assistance), emailing [ethicsandcompliance@aecom.com](mailto:ethicsandcompliance@aecom.com) or by going to <http://aecom.ethicspoint.com> (for online submission or toll-free dialling options in some countries).

## **5. Code of Conduct**

### **5.1 Human Rights**

Suppliers must support, respect and comply fully with all applicable laws and local human rights standards as well as ensuring they are not complicit in human rights abuses.

#### **5.1.1 Non-Discrimination**

All supplier employees must have equal opportunities regardless of gender, race, religion, age, sexual orientation, disability, nationality, political views and social or ethnic background except where otherwise enshrined in law. All employees should be treated with respect and not be discriminated against in any way or intimidated either verbally, physically or mentally.

#### **5.1.2 Working Hours and Remuneration**

- a. Suppliers shall fully comply with all applicable laws, regulations and industry standards on working hours and pay. Workers shall be paid according to applicable wage laws, including minimum wages, overtime hours and associated benefits.
- b. Suppliers will provide workers with breaks, time off and sickness allowance in accordance with local laws.

#### **5.1.3 Forced Labour**

AECOM will not tolerate any form of forced labour and suppliers must not engage in or support any forms of compulsory or bonded labour. Suppliers must not require any form of deposit from its workforce and must ensure all forms of identification e.g. passport, driving licence etc. remain in the possession of its employees.

#### **5.1.4 Child Labour**

Suppliers shall not use child labour or be complicit in its use throughout its own suppliers. Suppliers must ensure that all employees meet the minimum legal age for employment for all their operations irrespective of location. Suppliers are expected to inform the relevant authorities and AECOM immediately upon finding any evidence of child labour either in their own operations or that of their suppliers.

### **5.1.5 Right to Work Documentation**

Suppliers must check employees and prospective employees have the right to work in any country that the supplier provides goods and services. Suppliers should keep copies of all associated documentation provided by the employee and ensure it is genuine, unchanged from the original and that the employee has permission to undertake the work being offered.

## **5.2 Anti-Corruption**

- a. Suppliers shall comply with all applicable laws and regulations and industry standards related to anti-corruption.
- b. AECOM operates under the jurisdiction of the UK Bribery Act 2010 and the Foreign Corrupt Practices Act 1977 and expects suppliers to ensure they fully understand their commitments in line with these Acts. Third parties acting on behalf of AECOM are subject to these laws in the performance of their work and will be liable if they commit corrupt acts.
- c. Suppliers shall not bribe or attempt to bribe any public official, private person or representative of AECOM or any party acting on behalf of AECOM.
- d. Suppliers must not use illegal payments, bribes, kickbacks, grease payments or other inducements to influence any business transaction. AECOM prohibits bribery or corruption of any form by or of any of its employees and expect suppliers to apply the same principles.

## **5.3 Conflict of Interest**

Suppliers shall notify AECOM in writing immediately of any actual or potential conflict of interest together with recommendations as to how the conflict of interest can be avoided.

## **5.4 Health & Safety**

### **5.4.1 Health & Safety in the Workplace**

- a. The workplace, irrespective of the employees' role and place of work e.g. office-based, site etc. will be a safe and healthy place of work and in accordance with all applicable laws or local standards. AECOM recognises that certain roles will have inherent risk but suppliers must never compromise the safety of its own workforce, AECOM employees or representatives, third parties or the wider general public.
- b. When driving on AECOM business all local laws must be adhered to and employees must be licensed and safe to drive the relevant vehicle and be provided with legal, safe, fit-for-purpose vehicles maintained in accordance with the manufacturer's guidelines.
- c. Appropriate health and safety training, information and ongoing support must be made available to all employees.

### **5.4.2 Hazards**

Suppliers shall have suitable systems in place for providing workers and any associated contractors with safety information relating to dangerous goods, hazardous materials, and hazardous waste. This should include providing training and protecting employees from potential hazards including, but not limited to, raw materials, products, solvents, cleaning agents and waste products.

### **5.4.3 Emergencies**

Suppliers must have in place suitable emergency plans across their operations to minimise the potential impact of any emergency either as a result of its own operations or that of anyone working on their behalf.

## **5.5 Environment**

- a. Suppliers will comply with all applicable environmental laws and regulations and have in place the correct licences, permits, registrations and restrictions for their operations.
- b. AECOM's commitment to environmental sustainability is embedded within our Management Systems and employees are proactively encouraged to promote environmental sustainability throughout our operations, those we work with and the wider community.
- c. AECOM continuously seeks to reduce emission, waste and the use of natural resources through targeted environmental initiatives within its own operation, as part of the all design activities and in support of client requirements and the local community.
- d. Suppliers are expected operate, as a minimum, with a similar attitude to all matters relating to environmental management.

## **5.6 Ethical Procurement**

- a. AECOM expects the activities of its suppliers to be based on sound business values, demonstrating an open, ethical and fair approach with its suppliers.
- b. Suppliers are expected to conduct their business in a fair, consistent, open and honest manner allowing competition throughout its suppliers to the same or greater extent that AECOM provides to its suppliers.

## **5.7 Sustainability**

Suppliers must take all reasonable measures to ensure that their activities are undertaken in a manner consistent with AECOM's core values. AECOM's commitment to sustainability and procurement is underpinned by excellent governance procedures, social wellbeing initiatives and environmental compliance. This extends to our worldwide supplier base and we expect all our suppliers to conduct their worldwide operations in a sustainable manner.

## **5.8 Data Privacy and Information Protection**

- a. Suppliers shall maintain adequate protection of personal data and information for their operations, any third parties acting on their behalf and AECOM. Details of AECOM's Global Privacy Notice are available [here](#).
- b. AECOM will, and expect suppliers to, adhere to the principles of The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679). This Regulation covers data protection for all individuals within the European Union (EU) as well as the export of personal data outside the EU.
- c. Outside the European Union, AECOM and its suppliers will comply with the relevant legislation pertaining to the protection of personal data for that jurisdiction.

### **5.8.1 Protection of Personal Information**

- a. Suppliers will be consistent throughout their operations and be compliant with applicable data protection/privacy laws for all information, including Personal Information.
- b. Proper organisational structure, processes and procedures to ensure the protection, confidentiality, integrity and availability of information against accidental, unauthorised or unlawful loss, destruction, alteration, disclosure or use should be in place. This may include high level policies, procedures, guidance and training to cover security whilst taking reasonable steps to stay current.
- c. In all cases suppliers must notify AECOM immediately regarding any actual or suspected data breach. This will also include measures being taken by the suppliers, mitigations and outcomes to minimise the effect of the breach and likelihood of a reoccurrence.

## 5.9 Management Systems

- a. AECOM's aim is to have all suppliers certified to, or to be working towards certification to, ISO9001: 2015, ISO14001: 2015 and ISO 45001: 2018. If a supplier is not certified or working towards these standards, AECOM reserves the right to restrict or cease placement of contracts until the supplier demonstrates that they will work to the relevant AECOM procedures dependant on the project or service requirements. If a supplier, client or country has their own standards which are equivalent to or more stringent than AECOM will work within their standards.
- b. As a minimum, AECOM requires suppliers to be able to demonstrate management commitment to all matters relating to Health, Safety, Quality and the Environment and have robust systems in place to ensure compliance with their own procedures.

### 5.9.1 Registrations and Certifications

Where required, AECOM expects its suppliers to maintain any registrations, certifications, insurances or other formal documentation that formed a material requirement of their appointment. If these requirements lapse or are amended AECOM expects its suppliers to inform the relevant AECOM contact for each appointment as soon as practicably possible.

### 5.9.2 Third Party Responsibility

Suppliers must not engage with other third parties on behalf of AECOM or represent AECOM to other third parties without the express permission of AECOM.

## 6. Terms and Definitions

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|----|-----------------|--|
| a. | AECOM           | Any AECOM legal trading entity or reference to AECOM businesses  |
| b. | Applicable Laws | International, National or Local Laws  |
| c. | Suppliers       | Individual or organisation that provides items or services in accordance with a procurement agreement and in support of an AECOM project. This all-inclusive term may cover the following: vendor, seller, contractor, subcontractor, sub-consultant, dealer, fabricator, consultant, manufacturer, distributor, and their sub-tier consultants. |

## 7. References

It is essential suppliers fully understand their commitments to AECOM when agreeing to this Supplier Code of Conduct and **prior to providing AECOM with any goods or services**. For further guidance on any AECOM policies and procedures referenced within, please request these from your AECOM Contact.

- a. Quality Policy – AECOM Global Q1-001-PL1
- b. Code of Conduct – AECOM Global EC1-001-PL1
- c. Procurement Policy – AECOM Global P1-001-PL1
- d. Sustainable Procurement Policy P1-002-PL1
- e. Safety Health & Environmental Policy S1-001-PL1
- f. Collaborative Working Policy
- g. Supplier Evaluation Process

## 8. Records

- a. None.

## 9. Appendices

- a. None.

## 10. Change Log

Rev #	Change Date	Description of Change	Location of Change
0	14 June 2019	First release as EC2[EMEA]-001-PR1	All pages
1	13 July 2020	Cross-reference the inclusion of this code in the EMEA sub-consultancy agreements	Page 1, Section 1.c
		Link to the Global Privacy Notice added	Page 4, Section 5.7 a
		Section on "Audit Right" removed	Page 4, previous Section 5.8.2
2	14 December 2020	AECOM hotline details updated	Page 2, Section 4 d
3	2 August 2021	Latest AECOM branding applied	All pages
4	22 October 2021	New paragraph about SMEs	Page 1, Section 1.a
		New section dealing with Conflict of Interest	Page 3, Section 5.3