

## AECOM Political Engagement Policy for the United States

***AECOM participates in the political, legislative, administrative, and regulatory processes for the benefit of its employees, clients, communities and stockholders.***

AECOM is proud to participate in our democratic and political processes.

As the world's premier infrastructure consulting firm with significant business across the United States, we advocate for legislative, administrative and regulatory solutions and engage with and support candidates and causes that can have a positive impact on our communities, operations, employees and key stakeholders. These activities align with our core values as an organization and our purpose – delivering a better world.

AECOM participates in the political, legislative, administrative, and regulatory processes in four primary ways:

- **Lobbying activities:** Like many companies and organizations, AECOM engages in lobbying to ensure our views are considered in the formation of public policy.
- **Political contributions to candidates and ballot measures:** AECOM seeks to support and partner with those that support good public policy and help us meet the needs of our clients, employees and stakeholders.
- **The AECOM Political Action Committee (PAC):** This separate, segregated fund complements AECOM's corporate efforts to support candidates through the voluntary contributions of its eligible employee members.
- **Trade associations and coalitions:** These memberships and partnerships allow us to extend our voice on behalf of our industry in supporting policies that advance our ability to deliver infrastructure projects and solutions that uplift communities and meet our clients' evolving needs.

### Oversight & Compliance

AECOM acts responsibly in all its lobbying and political activities, ensuring that our decisions and actions involve our Legal, Ethics & Compliance, and Government Affairs functions. The AECOM Board of Directors has ultimate oversight of our operations and performance, and we ensure that our Board has visibility into our lobbying and political activities and routinely reviews them.

Oversight of AECOM's political and lobbying activities resides with the Nominating and Governance Committee of our Board of Directors. This Committee, comprised entirely of independent directors, annually reviews our lobbying and political activities, policies, and expenditures (including corporate contributions and payments to trade associations and other tax-exempt organizations that may engage in political activity) to ensure these activities align with our values and stakeholder needs.

All decisions and actions related to lobbying and political activity are subject to a comprehensive internal review process, administered by AECOM's Office of Risk Management, which requires the involvement and approval of executives representing AECOM's Legal, Ethics & Compliance, and Government Relations teams.

AECOM's Government Relations team, which manages the day-to-day lobbying and political activities of the company, reports into the corporate Legal team, ensuring that risk management, ethical standards and compliance are an integral part of its culture.

Every action we take is in strict compliance with local, state, and federal law. All political expenditures and all lobbying activities are properly disclosed as required by law.

Under no circumstances are our political or advocacy activities or contributions motivated by the personal political preferences of our Board of Directors or any officer, executive or employee of AECOM.

### **Lobbying Activities**

*AECOM has robust policies and procedures in place to effectively oversee decisions regarding lobbying activities*

AECOM has a comprehensive internal review process administered by its Government Relations, Legal, and Ethics & Compliance teams to oversee its lobbying activities. This group of executives ensures that:

- AECOM complies with all applicable laws when engaging in lobbying or political activity.
- Any outside firm retained to supplement AECOM's lobbying efforts at the federal, state or local level is adequately vetted and required to be properly registered as a lobbyist in the relevant jurisdiction.
- Any lobbyist engaged by AECOM must contractually agree to abide by the high ethical standards set forth in AECOM's Code of Conduct, Anticorruption Policy, and Insider Trading Policy.
- All AECOM employees receive annual training regarding the company's Code of Conduct, and specialized training is provided for employees involved in retaining and managing lobbyists.

In addition, external compliance consultants ensure the company stays abreast of changes in state and local compliance laws, as well as disclosure requirements.

*AECOM provides substantial disclosure regarding its lobbying activities*

AECOM is fully committed to complying with state and federal laws regarding public disclosure.

At the federal level, AECOM submits quarterly filings to the U.S. House of Representatives and the U.S. Senate that disclose overall federal lobbying expenses and the specific legislative and regulatory issues that were the subject of those lobbying efforts.

- To review our quarterly filings, visit the lobbying disclosure websites hosted by the House of Representatives (<https://lobbyingdisclosure.house.gov/>) and the Senate (<https://lda.senate.gov/system/public/>) and search for “AECOM” in the Registrant Name Field.
- In Calendar Year 2021, we reported lobbying expenditures of \$790,000. These include internal lobbying expenditures for employees registered as lobbyists.
- Key subjects on which AECOM lobbies include funding and policy issues related to transportation, water and general infrastructure programs; energy and environmental programs; disaster recovery and resilience; and certain defense and national security programs.

At the state and local level, AECOM files regular publicly available reports with public agencies, which disclose the Company’s lobbying activities as required by the applicable state and local laws. In many jurisdictions, external lobbyists acting on behalf of AECOM must independently file.

Click [here](#) for additional detail related to AECOM’s lobbying expenditures in 2021.

### **Direct Political Contributions**

AECOM makes contributions, where permissible, from corporate funds to candidates running for state and local offices and in support of state, regional and local ballot initiatives across the country. AECOM occasionally makes contributions to state and local political parties and political committees. Consistent with federal law, AECOM does not make corporate contributions to candidates for federal office.

- AECOM’s direct contributions to candidates are not made on a partisan basis.
- We support candidates and eligible political organizations of any party who share our priorities, even if we do not agree on every issue.
- Past support of a candidate or an organization does not mean that the company is providing similar support today or will in the future. A political contribution is not an endorsement from AECOM; AECOM does not endorse candidates for public office.
- Increasingly, governments are turning to voters to approve revenues and bonds for critical public infrastructure investments. AECOM believes in supporting these critical measures to help meet community needs and improve health, safety and the overall quality of life.

Each decision to contribute corporate funds to a candidate for elected office or a ballot measure receives rigorous internal review, administered by AECOM’s Office of Risk Management.

- This includes multiple rounds of review and approval by regional, business group, and corporate executives representing the corporation’s Legal, Ethics & Compliance, Finance, and Government Relations teams.
- As part of this process, all AECOM political contributions require approval of AECOM’s Chief Ethics & Compliance Officer, Deputy General Counsel and Head of Public Affairs.

From time to time, AECOM makes contributions to national organizations organized under Section 527 of the Internal Revenue Code. However, as a federal contractor, AECOM categorically does not contribute to federal “Super PACs” as defined in federal law and precedent.

AECOM does not engage in independent expenditures that expressly advocate the election or defeat of candidates or ballot measures.

From time to time, AECOM does make contributions to 501(c)(4) social welfare organizations.

AECOM discloses its corporate contributions on its website annually. Click [here](#) for additional detail related to AECOM’s corporate contributions in 2021.

### **AECOM Political Action Committee**

The AECOM Political Action Committee (PAC) is a voluntary, non-partisan fund that supports candidates seeking office at the federal, state, and local levels of government.

The AECOM PAC is overseen by a Board of Directors – including representatives from our Government Relations, Legal, Ethics, and operations teams – that reviews and acts on contribution requests received from AECOM PAC members and candidates. The AECOM PAC is also supported by an employee Advisory Council that provides input to inform the policy priorities underpinning the AECOM PAC’s contribution decisions.

The contributions made by the AECOM PAC are based on multiple criteria designed to identify candidates that will help ensure the best outcomes for our clients, communities, employees and shareholders. All AECOM PAC decisions are reviewed for legal and compliance purposes as part of the approval.

Our Government Relations team and the AECOM PAC Board of Directors evaluate a candidate’s eligibility for receiving a political contribution based on a review of the criteria below:

- Commitment to advancing infrastructure investment
- Commitment to advancing business-friendly policies
- Commitment to AECOM’s environmental, social and governance (ESG) principles
- Track record of leadership and sponsorship of priority legislation
- Representation of jurisdictions with key AECOM offices and employees
- Leadership and membership roles on key executive and legislative bodies

Contributions are not determined on the basis of political party affiliation. The AECOM PAC has a bipartisan track record, having supported candidates of both major parties and consistently strives to maintain that balance, even if we do not agree on every issue. For the AECOM PAC, bipartisanship is a critical element in the development of certain, long-lasting and effective public policy.

A political contribution is not an endorsement from the AECOM PAC. The AECOM PAC does not endorse candidates for public office. Past support of a candidate or organization does not mean that the PAC is providing similar support today or will in the future.

The AECOM PAC discloses its contributions on the AECOM website annually. Click [here](#) for additional detail related to AECOM PAC's contributions in 2021.

### **AECOM's Membership and Participation in Associations and Coalitions**

As a leader in the infrastructure industry, AECOM supports trade associations and other industry groups that represent a broad spectrum of views on infrastructure or public policy more generally. The breadth of the markets we serve and services we provide means that AECOM has historically been involved with an equally broad range of associations and coalitions.

These types of memberships and activities allow AECOM to share policy insights with, and learn from, our peer companies and clients, maintain critical relationships within the infrastructure sector, and allow us to jointly advocate for policies that support a healthy and competitive industry. We also benefit from the opportunity to share and obtain technical expertise and operational knowledge that leads to better safety, customer service and overall efficiency.

While trade associations may conduct lobbying on a wide range of issues, AECOM's membership in any specific association is not an endorsement of every policy that such association supports.

Pursuant to federal law, AECOM includes in its publicly reported lobbying costs the percentage of its membership dues and special assessments paid to trade associations that have been allocated to federal lobbying activity and deemed nondeductible. The percentage of our dues that is allocated to lobbying is communicated to AECOM by each trade association. These disclosures, required by the Lobbying Disclosure Act, are accounted for in AECOM's quarterly lobbying expenditure reports to Congress.

Above and beyond AECOM's requirements under law, AECOM discloses and discusses its strategy, memberships and payments regarding industry and trade associations with its Board of Directors, through the specific oversight responsibility of its Nominating and Governance Committee.

AECOM discloses dues paid to certain trade associations on its website annually, along with the percentage of those dues used for lobbying and political purposes. Click [here](#) for additional detail related to AECOM's trade associations dues in 2021.