

An aerial photograph of a park featuring a large pond, a curved wooden walkway, and trees with vibrant autumn foliage in shades of orange, yellow, and green. The scene is captured from a high angle, showing the layout of the park and the movement of people along the path.

Anticorruption policy

2026

AECOM DELIVERING
A BETTER
WORLD.

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1.0

Purpose and scope

AECOM succeeds on the merits of its own excellence and is committed to conducting its business ethically, honestly and with integrity. Corruption not only violates these ideals, but it is also illegal and prohibited throughout the world. As a U.S.-based company, all AECOM businesses must comply with U.S. domestic anticorruption laws that prohibit bribery within the United States and with the U.S. Foreign Corrupt Practices Act that prohibits corrupt payments outside of the United States. Ethical business conduct may also require compliance with other applicable anticorruption laws, regulations and conventions, including the U.K. Bribery Act (UKBA); the Criminal Law of the People's Republic of China (PRC Criminal Law); the Organization for Economic Cooperation and Development (OECD) anti-bribery convention; the World Bank Guidelines on Preventing and Combating Fraud and Corruption; and all other applicable laws in every country in which AECOM does business. These will be referred to generically as "anticorruption laws" throughout this policy.

This policy does not describe all of the specific requirements of anticorruption laws or anticipate every possible situation.

Rather, the purpose of this policy is to describe general ethical standards that AECOM employees and its third parties must abide by and to provide guidance on detecting and preventing corrupt practices. Please refer to AECOM's [Code of Conduct](#) and the [Ethics and Compliance Ecosystem](#) page for additional guidance on complying with these laws and with AECOM's core principles and conduct expectations.

This policy applies to AECOM and its subsidiaries, affiliates, directors, officers, employees, intermediaries, sub-consultants, other contracted third parties and any other persons performing similar functions on behalf of AECOM worldwide.

2.0

Policy

Any attempt to gain a business advantage through illegal payments, bribes, kickbacks, gifts, or other inducements will not be tolerated. AECOM employees and other persons or entities who are subject to this policy are prohibited from offering, promising, or giving a bribe or illegal inducement to anyone in the course of business. AECOM employees are also prohibited from accepting or agreeing to accept a bribe of any kind.

Additional corrupt activities such as collusion, bid rigging and other anticompetitive practices, coercion, false statements and misrepresentation and money laundering are also prohibited. It is a violation of this policy to alter or falsify books and records to conceal corrupt activity.

Any AECOM employee with knowledge of a violation of this policy is required to report it.

AECOM employees are required to complete regularly scheduled anticorruption training as assigned, generally annually as a part of Code of Conduct training. Employees must certify that they have read this policy and that they are acting and will continue to act in compliance with this policy.

2.1

Prohibited activities



2.1.1 Bribery

AECOM and other persons acting on behalf of AECOM may not make, offer, or authorize making payments of money or giving anything of value, directly or indirectly, to any government official (or an official's family member) to influence the official's actions, to obtain or retain business, or to secure an improper advantage. A corrupt act does not need to succeed in its purpose; merely offering or promising a bribe is prohibited by AECOM and anticorruption laws. AECOM also prohibits payments to private individuals or entities to obtain business or an improper advantage by corrupt means. Whether involving the public or private sector, payments of bribes or corrupt gestures of any kind are not permitted.

For purposes of this policy, references to restrictions on items of value for government officials should always be construed to include the government official's family members.

Anticorruption laws do not just ban direct cash payments, and there is no minimum monetary amount for an improper payment or gesture to be considered a bribe when it is offered or accepted with a corrupt intent. Corrupt inducements can include:

- Cash equivalents, such as gift cards or cryptocurrency
- Offers of jobs or internships to individuals or their family members
- Airfare and lodging
- Charitable or political donations
- Frequent or extravagant gifts and/or entertainment
- Gifts and/or entertainment offered to a friend or relative of a public sector official or AECOM client
- Tourist travel
- Discounts and loans
- Stocks
- Use of property
- Tickets to sporting events

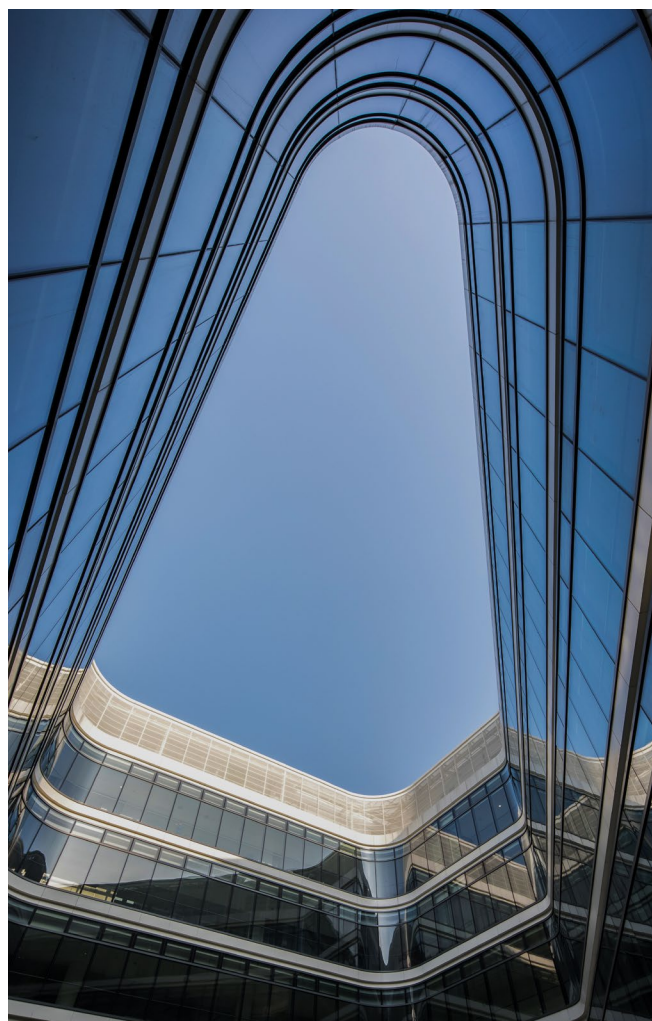
2.1.2 Third-party bribery

AECOM prohibits giving or offering money or anything of value to a third party when an AECOM employee involved in the transaction knows or should have known that the money or other thing of value will be given or offered to a government official or private client to obtain an unfair advantage. That means that AECOM employees can be held liable if they consciously disregard the true purpose of a payment, attempt to remain deliberately ignorant of the truth, or fail to follow up on red flags that suggest the possibility of illegal conduct. AECOM can also be held accountable for authorizing or endorsing a payment after the fact where it knew or should have known the payment violates anticorruption laws.

Just like its employees, AECOM subcontractors, intermediaries and any other third parties are prohibited from offering anything of value, directly or indirectly, to any other person or entity on behalf of AECOM with a corrupt intent. When AECOM stands to benefit from a third party's interactions with a client, a government agency or official, or any other entity, there is a risk that the third party will make a prohibited promise or payment that will be attributed to AECOM.

Regardless of the label used to describe them, the third parties that pose the greatest risk to AECOM and that require more careful screening are those that represent, act jointly with, or act with discretion on behalf of AECOM. Within AECOM, these higher risk business partners are the two categories of third parties typically referred to as Joint Venture Partners or Non-Technical Third Parties. Other labels used to describe Non-Technical Third Parties include:

- Sponsors
- Advocates
- Lobbyists
- Business Development Consultants
- Marketing Consultants
- Sales Agents
- Representatives
- Client Relationship Managers
- Freight Forwarders and Customs Clearance Agents
- Travel Agents



Examples of specific activities these higher risk third parties may undertake on AECOM's behalf include the following:

- Providing marketing, government advocacy, or business development services to help AECOM win work
- Obtaining approvals, licenses, or permits on behalf of AECOM or an AECOM client
- Arranging inspections on behalf of AECOM or an AECOM client
- Assisting AECOM with bidding on or negotiating a contract
- Coordinating or facilitating the receipt of payment on AECOM invoices to a client

AECOM employees are prohibited from using any third party to circumvent anticorruption laws or company policies.

2.1.3 Facilitating payments

Facilitating payments are small, infrequent payments made to a government official to expedite or secure the performance of a routine, non-discretionary action or service, and they are prohibited.

Examples include payments made to an individual government official to expedite or secure issuance of visas, exit stamps for passports, work permits, or tax refunds or small payments made to employees of state-owned utility companies to have service started or restored. Payments made directly to a government agency for expedited service fees in accordance with a government published fee schedule are not prohibited.

The only exception to this prohibition is where there is a clear and present danger of physical harm and the facilitating payment is necessary to prevent immediate harm to an employee. In instances where consultation with in-house counsel is not possible prior to making the facilitating payment, any such payments must be reported to the Legal Department as soon as possible.

When mobilizing or setting up a local office in foreign countries and/or areas with complex requirements, plan ahead on the process for obtaining necessary licenses, permits and services. Customs delays or difficulties in dealing with local utility companies are not legitimate reasons to make facilitating payments.

2.1.4 Anti-competitive practices

In all of the countries where we operate, we also must comply with competition or antitrust laws. Anti-competitive practices often involve collusion among competitors to enter agreements to reduce or eliminate competition in the market. These types of agreements are always illegal. The most common examples of such illegal practices are:

(a) Price fixing: Competitors agree to charge the same price for goods or services to consumers or clients.

(b) Bid rigging: Businesses that would otherwise be expected to compete conspire to predetermine which company will win a bid related to products and services. Bid rigging can take several forms, such as bid rotation (competitors agree to take turns winning bids), bid suppression (competitors agree not to bid or to withdraw a bid so another can win) and complementary bidding (competitors submit inflated bids to make the competition appear legitimate while allowing another party to the agreement to win with a lower bid).

(c) Market division or customer allocation: Competitors divide the market so each has an advantage or no competition in a particular market segment.

(d) Group boycotts: Competitors agree not to sell goods or services to a particular company or individual.

AECOM, its employees and others subject to this policy may not collude on project bids or otherwise engage in any of the above improper practices.

AECOM frequently forms joint ventures to deliver services in a pro-competitive manner that benefits our clients. However, forming a joint venture merely to reduce or eliminate competition is not permitted. AECOM's Approval matrix trigger 3.2.(h) requires approvals prior to forming joint ventures, and that review should consider competition risks.

Consult with Legal any time we are forming a joint venture with a competitor to ensure that competition concerns are thoroughly examined before we enter into an agreement.

2.1.5 False statements and misrepresentation

AECOM and its representatives are prohibited from making false or misleading representations to third parties, clients or prospective clients, or government regulators. Misrepresentations and false statements can occur at any stage of a project lifecycle. False or misleading statements can result in civil and criminal liability, loss of contracts and debarment by governments, International Financial Institutions and private clients. We must always be honest in what we tell our clients and other third parties and never deliberately mislead them.

Below is some guidance to assist with avoiding false statements and misrepresentations at various stages of a project.

- **Bid Submissions and other Proposals**
 - Strictly follow bidding rules and government regulations, which commonly prohibit contacting procurement officials during the proposal stage
 - If bids involve evaluation of personnel, provide accurate descriptions of the qualifications and availability of personnel proposed for the project
 - Discuss with Legal if current government employees or personnel who recently left government service will be included in the proposal
 - If using experience, qualifications or projects of other AECOM entities not involved in the project, make sure doing so is permitted by the tender rules, and accurately represent the role of any other AECOM entities that will be involved
 - If required, disclose possible conflicts of interest and third parties involved in bid preparation
- **Project Execution**
 - Do not falsify or knowingly present false test or laboratory data
 - Inform the client of key personnel substitutions if required to by the contract
 - Do not intentionally misrepresent project timelines or progress
 - Never falsify inspection reports, even if asked to by the client
- **Client Billings**
 - Client invoices must always be accurate
 - For time and material projects, billing rates must reflect the rates of personnel involved
 - For variation orders on fixed cost projects, do not present estimated or reconstructed time records as contemporaneous time sheets

2.1.6 Coercion

AECOM employees are prohibited from exercising undue influence or improper use of authority, information, physical force, or other such advantage in order to force an individual or entity into an agreement or action they would not otherwise consent to. This prohibition includes coercive actions to stifle reporting of misconduct or retaliation against employees for raising concerns. Employees should always feel comfortable reporting suspected misconduct for prompt investigation without fear of retaliation. Individuals who retaliate against a person for making a report or participating in an investigation will face disciplinary action, up to and including termination of employment.

2.1.7 Money laundering

Money laundering is the process by which a person or group tries to conceal illegal funds or attempts to make the sources of their illicit funds look legitimate. Money laundering is often related to terrorist financing and narcotics trafficking, and the U.S. and other countries have sanctions programs that identify and prohibit doing business with individuals and entities known to be engaged in those activities. AECOM is committed to the global effort to combat money laundering and may not engage in any money laundering activities.

While regulations aimed at preventing money laundering are primarily imposed on banks and other financial institutions, all companies must implement some level of anti-money laundering controls to avoid inadvertent involvement. At AECOM, we must perform "know your customer" due diligence on clients that at least includes a sanctions and watchlist screening to ensure that the companies and individuals we work for have not been sanctioned by the U.S. government, United Nations, European Union or other countries or organizations. Questions about due diligence requirements for clients should be discussed with Ethics & Compliance.



2.2

Activities requiring caution

2.2.1 Hiring government officials and their relatives

Hiring or awarding employment or internships to current or former government employees or to their relatives presents several corruption risks. AECOM employees may not circumvent normal hiring processes or otherwise use their influence to help government officials or their family members get jobs or internships at AECOM or another company.

Additionally, current and former government employees may be subject to "revolving door" laws that impose post-government employment restrictions on employees to prevent conflicts of interest and improper business practices. Enterprise Approval Matrix trigger 3.2(f) requires prior approval for exploratory and prospective employment discussions and for all proposed offers of employment if the individual is a current government official or has left government service within the last two years.

Human Resources/Talent Acquisition plays a critical role in reducing corruption risks through screening candidates for employment and internships by:

- Selecting candidates who are suitably qualified for the position and have not been hired in order to obtain or retain business
- Hiring according to the ordinary, approved process
- Recognizing requests from government officials, customers, or AECOM employees to hire a government official or their relative as a potential red flag and then mitigating the risk posed
- Responding to hiring referrals by saying that the application must go through the Company's ordinary hiring process
- Ensuring that referred candidates do not receive preferential treatment
- Consulting with the Legal or Ethics and Compliance when there is uncertainty about the legitimacy of a hiring action

2.2.2 Charitable and political contributions

Anticorruption laws do not prohibit legitimate charitable contributions or sponsorships. However, a charitable contribution or sponsorship made with the intent of receiving an improper benefit from a government official is prohibited. Moreover, payments must not be made under the guise of charitable contributions as a means to circumvent anticorruption laws.

In the United States, political contributions that are made for proper purposes and in accordance with law are not prohibited. In other countries, political contributions may be further restricted or prohibited by law or regional policies. Political contributions intended to influence or obtain a specific business advantage from a government official or candidate for political office or as a means of funneling a bribe payment to that individual are prohibited everywhere.

Appropriate due diligence should be conducted with respect to charitable and political contributions to ensure the legitimacy and legality of the contributions. **The Approval Matrix** requires approvals for all charitable contributions (section 3.2(e)) and political contributions (section 3.2(b)). Charitable contribution approvals should be obtained through the **Gifts, Entertainment and Contributions Approval System (GECAS)**; political contributions in the U.S. must be approved through GECAS, but approvals for any political contributions outside of the U.S. should be obtained through a Request for Approval. All approvals must be obtained prior to making the contribution.

2.2.3 Gifts and entertainment

Anticorruption laws typically do not prohibit the giving of gifts, entertainment and other business courtesies when they are reasonable and customary. However, many countries, government agencies and commercial enterprises specify limits on the type and value of business courtesies that can be given or received. Gifts or business courtesies may never be provided if they are being offered in exchange for an unfair business advantage or if offering them could create the perception of an improper motive. An employee must not accept any gift when doing so could influence or appear to influence his or her actions, and AECOM employees should never request a gift from another party.

All gifts must be made in full compliance with local law and with AECOM policies and procedures, as well as the other party's policies and procedures. AECOM's **Gifts and Entertainment Policy** establishes global rules related to giving or receiving gifts, listing certain types of gifts and entertainment that are prohibited. The global policy is supplemented by regional procedures that set monetary limits or require approval of gifts or entertainment in order to ensure that the gift or entertainment would not be prohibited by anticorruption laws, local laws or regulations, or the recipient rules. Before giving or receiving any gift or entertainment, refer to your regional or group procedure on gifts and entertainment for further guidance. The **Gifts, Entertainment and Contributions Approval System (GECAS)** should be used for obtaining approvals or recording gifts and entertainment when required by your local procedure.

Important considerations regarding gifts and hospitality:

- **Accurate recordkeeping.** Payments and expenditures for gifts of any value must be fully and accurately recorded in AECOM's books and records.
- **Frequency.** Multiple gifts given to the same recipient, even if inexpensive, may create the perception that they are being given for an improper purpose. Many government agencies have annual limits on the total value of gifts and hospitality that an employee can receive.
- **Reasonable and appropriate.** Gifts must be reasonable in value and appropriate to the recipient's position and the circumstances. Relevant circumstances include the timing and context surrounding the gift, as well as any past, pending, or future business dealings with the recipient.

2.2.4 Reimbursement of certain travel and lodging expenses

It may be permissible to cover certain reasonable and *bona fide* expenses for government officials or other clients when those expenses are related to sales or marketing efforts or to fulfill contractual obligations. Such expenses could include travel or lodging directly related to product demonstrations or tours of company facilities. However, AECOM must be careful to pay only the expenses legitimately related to the business purpose. For example, paying for sightseeing side-trips, for travel by significant others, or for first-class airfare will rarely, if ever, be permitted. Similarly, accepting travel and lodging expenses from third parties can create potential conflicts or the appearance that an employee would be biased in evaluating that third party were it seeking to do work with AECOM. For these reasons, offering or accepting travel expenses must be approved through the **Gifts, Entertainment and Contributions Approval System (GECAS)**, regardless of value.

2.2.5 Payments permitted by local law

A payment to a government official that would be prohibited by a particular anticorruption law may be permissible if it is lawful under the written laws of the government official's country. However, very few countries have laws that permit payments that other anticorruption laws prohibit, so this scenario would occur rarely, if at all. Prior Ethics and Compliance review and approval are necessary for any such payments.



3.1

Dealing with governments and government officials

Projects involving governmental entities pose the most significant corruption risk to the Company because anticorruption laws and enforcement are largely aimed at combating corruption related to government contracts and governmental officials. In addition to AECOM's prohibition on corrupt payments to any party, our policies are often more restrictive with respect to interactions with governments and government officials than with private companies due to this increased risk.

The definition of government in anticorruption laws covers governmental agencies at every level—national, state or provincial, or local—and in every branch—executive, judicial, legislative, or administrative. Similarly, the term "official" does not just refer to those at the top of the organization; any employee of a government agency, whether paid or not, is considered a government official, regardless of rank, seniority, or position. Publicly funded or state-affiliated entities are typically considered governmental entities, even when the function of the organization does not appear to be governmental in nature. Employees of multi-lateral funding organizations like the World Bank, employees of international organizations such as the U.N. and members of royal families are also considered government officials.

Representatives of any entity tendering a public works project will almost always be a government official, even if the organization itself does not appear to be a government institution.

In certain countries, such as China and many Middle Eastern countries, where state-owned entities are particularly prevalent, due diligence beyond that required for anti-money laundering screening may be required to determine whether the client is a state-affiliated entity since AECOM policies often include different requirements when dealing with governmental entities than with private companies.

3.2

Dealings with international financial institutions (IFIs)

IFIs, bilateral or multilateral development bank or donor agencies, including entities such as the World Bank and others, often partner with national governments and businesses. IFIs all have their own anticorruption requirements that often introduce obligations beyond those of anticorruption laws. For this reason, AECOM has adopted an **International Financial Institution (IFI) Funded Business Management Policy** and an **International Financial Institution (IFI) Funded Project Procedure** to ensure compliance with IFI tendering rules and contract execution requirements. Personnel who are bidding or working on an IFI-funded project must complete IFI project training tailored every year to ensure awareness of the additional requirements and risks related to conducting work funded by IFIs.

3.3

Third-party engagement and monitoring

As discussed above, anticorruption laws prohibit corrupt payments made indirectly through third parties on behalf of AECOM, and AECOM can be held liable for those payments even if it had no actual knowledge of a third party's corrupt act. Therefore, AECOM must take measures to reduce the risk when choosing and entering into an agreement with any third party who will transact business on AECOM's behalf. Through vigilance and interactions with third parties, AECOM's employees are our first line of defense in ensuring that the third parties we work with share our ethical values and operate in a legal and compliant manner. Prior to engaging a third party, AECOM also requires that due diligence (essentially, a background check) be conducted on the third party. Due diligence may be fast, easy and free or it may be time consuming and involve some cost to the business, but it is an essential component of AECOM's anticorruption compliance program. Such due diligence helps us establish that the third party is reputable and operates ethically.

3.3.1 AECOM employees' third-party engagement obligations

AECOM employees who are involved in engaging or regularly interacting with third parties must act as the companies "eyes and ears" in identifying and reporting risks or suspicious behaviors. Prior to contracting with any third party, employees both in operational and functional roles need to be alert to red flags of corruption. Many of these warning signs may not be identified through desktop or even enhanced due diligence searches. The presence of a red flag does not automatically disqualify a third party and may be easily explained, but it does indicate a need for further scrutiny and implementation of safeguards against a possible violation. AECOM employees who encounter such red flags are required to satisfactorily address them prior to further engagement and should seek guidance from the Legal Department or Ethics and Compliance when necessary. Some common red flags are identified below.

Red flags

When engaging a third party and conducting due diligence, particular attention should be paid to any potential red flags, such as:

- The transaction involves a country that has a reputation for prevalent corruption.
- The third party has a close family or personal relationship to a government official.
- A client or government official is insistent that the third party become part of the transaction.
- The third party objects to anticorruption representations in contractual agreements.
- The third party requests unusual contract terms or payment arrangements, such as a payment in cash, payment in another country's currency, or payment in a third country.
- The third party's requested compensation is disproportionate to the work to be performed.
- The third party provides only vague details about the work to be performed, makes suspicious statements about its method of operating, or is otherwise evasive or secretive about its activities. The third party is in a different line of business than that for which it has been engaged or otherwise appears unqualified for its role.

Before proposing a third party, employees should pay particular attention to the third party's compensation to ensure it is reasonable and justified. Subcontractors, which constitute the majority of AECOM's third parties, should be compensated based on the market value of the services provided. When possible, the selection of subcontractors should be decided through competitive bids or review of multiple quotations. The economic benefit conferred on Joint Venture partners, consortium members and teaming partners should be proportional to their stake in the JV or teaming agreement or their scope of work. AECOM disfavors paying commissions and other fees to third parties where the amount of payment is contingent on winning a contract and is calculated as a percentage of the value of the anticipated sale or contract. Such contingent fee arrangements make it difficult to determine whether commission payments are justified by the third party's actual work or expertise and increase the probability that funds could be diverted to government officials. Such arrangements also may be prohibited in some jurisdictions or for certain contracts. Any request to pay a third party through commissions or other contingent fee arrangements must be approved by Ethics and Compliance prior to signing a contract with the third party and is unlikely to be approved. Additional due diligence or mitigation may be required for such arrangements.

3.3.2 Due diligence

Prior to engaging a vendor, subcontractor or other third party or to forming a joint venture or other business association with a third party, appropriate anticorruption due diligence must be completed and documented. The essential requirement of third party due diligence is to perform a risk-based inquiry to determine whether a prospective third party business partner is honest and can be reasonably expected to refrain from corrupt activities. Effective third-party due diligence should help AECOM reach the following conclusion: "I am confident that my sub consultant, joint venture partner, freight forwarder, etc. does not make corrupt payments, and that our business relationship is a normal, legitimate one. I can explain to, and convince others why, my confidence is justified."

Anticorruption due diligence is incorporated into AECOM's procurement processes and varies by region or country, as well as by third party type. All third party due diligence must include at least a watchlist/sanctions screening, but other due diligence steps may include adverse media searches, checks to determine if the third party is a government-affiliated entity, completion of internal and external forms to evaluate the risks of an engagement, enhanced due diligence reports on the company provided by an outside vendor, or communications with the third party about potential issues. Make sure you know and follow your region or group's procurement process on supplier qualification prior to engaging third parties, including required anticorruption due diligence. The Ethics and Compliance component of due diligence is also summarized in regional [Quick Guides](#) available on the Ethics and Compliance Ecosystem page.

3.3.3 Contractual requirements

All engagements of third parties must be done through written agreements that must include approved anticorruption provisions that are appropriate to the risk posed by the engagement. Most third parties we engage are also required to read and comply with AECOM's [Supplier Code of Conduct](#). Regions have adopted standard contract terms that include the approved anticorruption contract terms for particular types of engagements, so consult with Legal if you are unsure of the appropriate contact template to use for a particular engagement. Changes to standard anticorruption terms must also be approved by Legal.

3.3.4 Ongoing monitoring and renewal due diligence

After a contract is signed, AECOM must continue to monitor the third party for compliance with its contractual anticorruption obligations and for any red flags suggestive of misconduct. Any red flags identified during the course of the relationship with the third party must be referred to the Legal Department or Ethics and Compliance for advice and analysis, which may require undertaking additional due diligence and, in cases where serious issues are identified, termination of the relationship. Most third parties will be continuously monitored for adverse and negative sanctions/watchlist results that occur after due diligence is conducted.

Even if no red flags are identified during the period of performance, due diligence results grow stale after a period of time and must be renewed periodically, typically every three years, to ensure there have been no changes in the third party's ownership, management, history of investigations, allegations of misconduct, or other characteristics that could change the risks related to the third party. More frequent periodic certifications of ethical compliance may also be warranted for certain third parties.

3.4

Recordkeeping and accounting requirements

Anticorruption laws require maintenance of accurate business records. AECOM and its subsidiaries must:

- Keep accurate books and records that reflect transactions and disposition of assets in reasonable detail. Misleading, incomplete, or false records of any kind are prohibited. No undisclosed or unrecorded funds or accounts may be established for any purpose. These include, but are not limited to:
 - Unrecorded or unreconciled petty cash disbursements or cash advances
 - Real or personal property held by a third party
 - Bank accounts in the name of individuals but containing corporate funds
 - Records that disguise any element of the transaction
 - Indirect payments (payments that will knowingly be made directly or indirectly to a government official)
- Develop and maintain a proper system of internal accounting controls, including periodic audits
- Report any (a) requests for payments that would violate this policy or (b) transactions, past or current, that appear to violate this policy or otherwise appear suspicious in nature.

Business communications in any form are also considered business records and must be maintained in accordance with AECOM's [Record Management and Retention Procedure](#). Electronic communications should be conducted through AECOM-managed messaging and email applications such as Outlook and Microsoft Teams. Use of unapproved mobile messaging applications such as WhatsApp, WeChat, Telegram, Facebook Messenger and Signal may not be used for substantive business communications unless an exception has been granted. When an exception is granted, records of business communications on these applications must be preserved. Please review the [Use of Mobile Messaging Applications for Business Communications Policy](#) for more details.

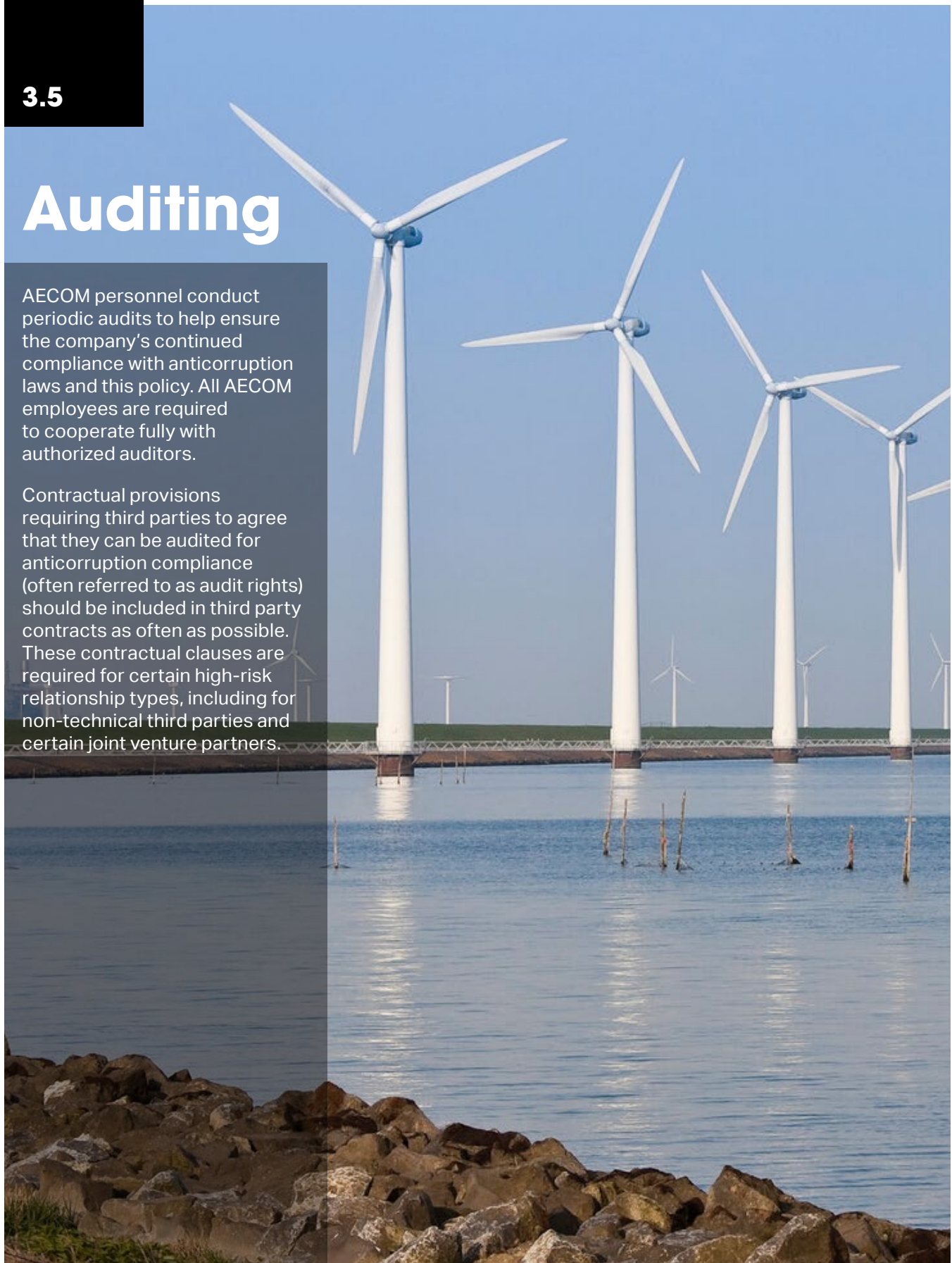
As stated in the Code of Conduct, all business communications – regardless of the platform or device on which they are stored – belong to the company and must remain accessible.

3.5

Auditing

AECOM personnel conduct periodic audits to help ensure the company's continued compliance with anticorruption laws and this policy. All AECOM employees are required to cooperate fully with authorized auditors.

Contractual provisions requiring third parties to agree that they can be audited for anticorruption compliance (often referred to as audit rights) should be included in third party contracts as often as possible. These contractual clauses are required for certain high-risk relationship types, including for non-technical third parties and certain joint venture partners.



4.0

Disciplinary penalties

Governmental investigations of anticorruption laws can result in significant cost and damage to the reputation of a business. Violations by AECOM employees of anticorruption laws and this policy may result in disciplinary measures against the culpable employees, including termination of employment. Violations can also result in significant criminal, civil and regulatory penalties imposed by governmental entities against those AECOM employees.

5.0

Reporting suspected violations

Employees are required to report any (a) requests for payments or other consideration that would violate this policy or (b) transactions, whether current or in the past, that appear to violate this policy or otherwise appear suspicious. Employees can report by contacting a supervisor, human resources, in-house counsel, the Ethics and Compliance department, or the AECOM Ethics Hotline.

The AECOM **Ethics Hotline** is available at aecom.ethicspoint.com. You can report an issue through the web portal or look up local numbers to call to report an issue. You can also report using a mobile device by scanning the QR code on this page. Reporters may choose to remain anonymous. AECOM does not tolerate retaliation against anyone who makes an honest and sincere report of a possible violation or who participates in an investigation of possible wrongdoing.



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