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1. Purpose and Scope

AECOM is committed to exceptional levels of performance in safeguarding our employees, subcontractors, the public and the environment. As an expression of this commitment, AECOM’s Safety for Life program includes a Global Safety, Health, and Environment (SH&E) Management System that sets out the policies, expectations, and commitments for AECOM. The AECOM Global SH&E Management System, guided by our Life-Preserving Principles, enables employees, subcontractors and clients of AECOM to fully understand, and themselves commit to safety, health and environmental excellence. We foster a Culture of Caring that expects our employees, contractors and business partners to take responsibility for their own safety as well as for colleagues and others associated with our work.

This Manual describes AECOM’s Global SH&E Management System and documents the policies, process, and procedures for the systematic and uniform approach to regulatory compliance, managing SH&E risks and opportunities, and to continual improvement. This Manual also specifies how AECOM documents, implements, monitors and maintains our Global SH&E Management System consistent with AECOM’s Integrated Management System.

Contained within this Global SH&E Management System Manual are descriptions of our supporting global SH&E requirements. These global requirements define minimum SH&E requirements in a wide range of areas reflecting the nature of our activities. The AECOM SH&E Management System is made accessible to AECOM employees through our company intranet, and is available upon request by external parties, such as clients or employee representatives.

The scope of the SH&E Management System covers AECOM operations worldwide. The scope of the SH&E Management System is defined as the combined areas of direct control and influence in AECOM and includes:

- All SH&E issues under AECOM direct control (e.g., direct hires [including those in staff augmentation contracts], subcontractors under direct AECOM supervision, populated joint ventures where AECOM is the managing partner, etc.).
- External SH&E issues where AECOM exerts indirect management control including activities, products and services of suppliers, contractors, subcontractors and clients.
- Monitoring of AECOM’s SH&E performance to confirm that AECOM’s activities are compliant with the processes and requirements outlined in this Manual and that the health and safety of AECOM employees, other stakeholders, and the natural environment are being duly respected.

The scope of the SH&E Management System covers all activities including shared / sole occupation of client premises managed by AECOM, except when:

- Seconding staff to other organizations.
- Working as part of a Joint Venture / Project Consortia where a third party has developed a project-specific SH&E Management System, and AECOM has agreed to the third party system (AECOM is not the managing partner).

In these situations we may contribute to and work under another party’s SH&E Management System but will not have overall responsibility for its implementation. However the company recognizes that in these situations a duty of care is still owed to our employees and preference, where possible, is that the AECOM SH&E Management System is utilized.
2. **SH&E Management System**

2.1 **SH&E Management System Description**

The AECOM Global SH&E Management System is based on the requirements of internationally recognized standards for SH&E; BS OHSAS 18001 (Occupational Health and Safety Management Systems), ISO 45001 (Occupational Health and Safety Management Systems), ISO 14001 (Environmental Management Systems), and ANSI Z10-2012 (Occupational Health and Safety Management Systems). Meeting the requirements of these standards demonstrates to our clients that we have a robust, high quality SH&E Management System.

In many locations, our system has achieved third party certification, which is awarded following an independent assessment. While the scope of the system applies throughout the world, not all locations currently hold third party certification to ISO / OHSAS standards. These locations are still required to follow the fundamental principles of the SH&E Management System detailed in this document and those policies and procedures specific to their geographies. Our third party certified locations are highlighted on the appropriate certificates.

2.2 **SH&E Management System Integration & Implementation**

The corporate structure for the competent and effective delivery of AECOM’s SH&E Management System is illustrated in the organization chart on the company intranet. The Chairman & Chief Executive Officer (CEO) has overall responsibility for SH&E within the company. The CEO delegates the day-to-day duties to the super-geography and Business Group Presidents who confirm SH&E policy, strategies and objectives are implemented and embedded into their businesses. SH&E Teams, established in each country or region, are led by the Directors of SH&E, which are responsible for functional SH&E matters, system development and providing advice and guidance as needed. There may be local variations of this structure in some locations, with local specific procedures providing clarification.

While active participation in AECOM’s Safety for Life program is a responsibility and expectation of all AECOM personnel, Project Managers (this may include Location, Office, Operations or Program Managers / Directors), shall have the overall responsibility for implementation of the SH&E Management System on their respective project sites and offices. SH&E Management System activities shall be integrated throughout the project’s lifecycle; from pre-bid (S2-001-ATT4 Catastrophic & Critical Consequences Guidance functions as a resource in the project’s risk assessment process) and start-up, through execution and close-out. The main SH&E roles and responsibilities of key project personnel and their staff shall be outlined in the associated SH&E Plan. SH&E representatives shall act in an advisory capacity within their area of expertise to assist in proper planning, implementation, monitoring and continual improvement of the SH&E Management System and to promote the AECOM Safety for Life program.

2.3 **SH&E Management System Documentation Structure**

AECOM’s Safety Health & Environment (SH&E) Management System documentation, includes:

- The Global SH&E Policy (S1) – confirms AECOM’s commitment to safeguarding our people, projects and reputation by striving for zero employee injuries and illnesses, avoiding property damage and by operating and delivering our work responsibly and sustainably.
- The Global SH&E Management System Manual (S2) – describes how AECOM documents, implements, monitors and maintains our Global SH&E Management System and provides minimum global requirements.
- Procedures, instructions and forms – provide requirements and guidance additional to the minimum global requirements, specific to the super-geographies (S3 - Americas, Asia-Pacific [APAC], Europe, Middle East & Africa [EMEA]) and as necessary to the Business Group or specific country / region (S4).

SH&E Management System documentation is made readily available to AECOM personnel through the company’s intranet. The documentation is also provided to employees and further supplemented through location or project specific SH&E Plans (equivalent terms may be used such as, Health and Safety Plan [HASP], Safe Work Method Statement [SWMS], SH&E Management Plan [SHEMP], etc.). Further supplementation found in location or project specific SH&E Plans includes:
• Descriptions of roles and responsibilities applicable to the location or project.
• Completed risk registers / hazard assessments for each task and operation found in the work scope.
• Supplementary information to the provided AECOM procedures that is specific to the location or project (e.g., incident reporting / notification, jurisdiction-specific regulatory requirements, client requirements, medical surveillance requirements, monitoring requirements, site access control measures, inspection frequency, etc.).
• Induction / orientation and training requirements.
• Personal protective equipment requirements for the separate tasks or operating areas.
• Location-specific Emergency Response Plan.
• Any additional content and plans necessary to enable safe execution of the scope of work.

If existing documented SH&E Management System requirements or procedural content cannot be complied with and a variance to the procedures or requirements is necessary to conduct an upcoming task, documented approval to vary from procedure or requirement shall be sought from the applicable SH&E Director or designee. Should approval be obtained, the variance to the SH&E Management System requirements or procedure content may be followed for the pending task specific to the project only, or for such duration as specified by the SH&E Director or designee. Compliance with documented SH&E Management System requirements and procedural content is required for the associated task thereafter.

2.4 Monitoring, Assessment and Corrective Actions

Assessment of the implementation and effectiveness of the SH&E Management System is be conducted to identify strengths and opportunities. These inform our continual improvement process, objectives, and targets. Assessment activities are driven by our incident prevention model, and may include, but not be limited to, consultation and review of observations and feedback (employee, client, subcontractor, safety committees, etc.), inspections and audits, investigations, project closure reviews, etc.

*AECOM Incident Prevention Model (IPM)*
In addition to guiding assessment activities, AECOM’s Incident Prevention Model serves as a framework to ensure that our key performance indicators, known as our Core Value Metrics (CVMs), are selected to drive the most impactful activity-based behaviors at each level of the organization. Targets associated with our CVMs are set at the corporate level, with additional targets set specific to each Business Group and geography. Targets are agreed upon using industry best practices, scope of work risk assessment, and heightened standards to track key proactive behaviors on a monthly basis and drive our goals of incident prevention and continual improvement.

### 2.4.1 Assessment, Audit and Inspection

Internal or self-assessment audits and inspections are performed to monitor compliance with the SH&E Management System. Audit schedules shall be established in AECOM locations, including worksites and/or offices, where required by AECOM, its clients, or local legislation. Training of auditors shall be applicable to the audit conducted. The terms of reference for auditors are to:

- Determine and record compliance with the requirements of the Management System and associated International Standards; including OHSAS 18001, ISO 45001, and ISO 14001.
- Identify areas of non-compliance, agree on corrective action with the responsible employees and record this in the relevant corrective action tracking tool.
- Identify opportunities for continual improvement.
- Identify opportunities for improvement in business efficiency.
- Provide input to the Management Review.
- Raise awareness of the Management System.
- Identify trends as a baseline for improvement.

The company’s activities at sites and facilities are also monitored through workplace inspections. These inspections will be arranged as required by the Project Manager. At a minimum, workplace inspections will be performed monthly and may be performed more frequently as required by local regulations or Business Group requirements and stated in the SH&E Plan. Workplace inspections are also supplemented by Senior Management activities providing visible involvement, interest and support.

Project / Program Safety Reviews (PSRs)) shall be conducted by SH&E Management to systematically review a project’s or program’s field activities and the application of AECOM’s Safety, Health and Environment Management System. The order of the assessment is in accordance with AECOM’s Life Preserving Principles.

- The assessment findings are recorded and scored as detailed within the geography’s Program SH&E Review Assessment form or the Project Safety Review tool within LifeGuard or IndustrySafe. The assessment shall include a summary of findings, corrective actions, and assignment of responsible parties.
- The Program SH&E Review Assessment shall be used to complete the geography’s Program SH&E Review Summary or be summarized within LifeGuard or IndustrySafe. The summary is intended to enable presentation of Project / Program SH&E Review findings and recommendations to program or project management and any other relevant stakeholders.

Senior Management shall complete Senior Management Observations (SMOs) on field sites and in offices by employing observations and conversations with employees to answer questions that are aligned with our Life-Preserving Principles. This activity, as well as senior management walk-throughs, demonstrate management commitment to our SH&E goals, and provides real-time, first-hand information about the application and effectiveness of our SH&E program.

### 2.4.2 Monitoring

Monitoring of the SH&E Management System implementation and effectiveness is reviewed at corporate, regional and business unit level. SH&E Managers prepare regular SH&E performance reports for their respective management teams. These reports may include details of:
• Incident and near miss reports.
• SH&E performance including data on the Core Value Metrics (CVM) showing actual performance against target (reported and reviewed monthly at a minimum).
• Progress against corporate / group objectives and targets.
• Progress of SH&E initiatives.

Online Reporting Databases – The SH&E Team monitors the contents of IndustrySafe and LifeGuard so that appropriate action can be taken to close out the entries.

IndustrySafe and LifeGuard are also reviewed so that any trends or patterns of behavior which could affect SH&E performance can be identified and appropriate responses developed and implemented.

2.4.3 Corrective and Preventive Action

The SH&E Team shall regularly review reports for evidence of non-conformance, deficiency or risk so that appropriate corrective and preventive action can be taken. This action may include but is not limited to:

• Carrying out an investigation into the circumstances.
  – Analysis of the causes of the non-conformity.
  – Assessment of consequences of occurrence (e.g., direct / indirect costs, project schedule impact, etc.).
  – Preparation of proposed necessary preventive action.
  – Implementation.
  – Review of the effectiveness of the action.
  – Review of risk assessments including any statutory SH&E aspects.
• Identifying opportunities for improvement and innovations.
• Issue of guidance to staff and management.
• Issue of a lessons learned bulletin.
• Review of current policies, training, risk assessments, processes and procedures.
• Review of the implementation of corrective and preventive action’s effectiveness.

Corrective and preventive action shall be appropriate to the effects of the potential non-conformity, deficiency or risk. In particular, it shall take into account:

• The effect on the safety and health of employees, subcontractors, the public, and the environment.
• The effect on AECOM’s service to the client.
• Exposure of AECOM to technical and / or commercial risk.
• The need to continually improve the Management System.

Corrective and preventive action shall be the responsibility of the SH&E Directors / Managers. Actions shall be entered into IndustrySafe and LifeGuard, and progress will be tracked.

• All corrective and preventive actions with due dates or estimated completion dates in excess of 30 days from the start date shall be reviewed by SH&E Directors / Managers for appropriateness of due date or estimated completion date.
• SH&E Directors / Managers shall coordinate with the corrective action’s responsible parties to achieve earlier resolution if due dates or estimated completion dates are deemed unacceptable.
• Corrective and preventive actions that cannot be completed by the due date or estimated completion date shall require review and approval by the applicable SH&E Director.

2.4.4 Management Review

Senior management will review the organization’s SH&E Management system at planned intervals (annually as a minimum) to confirm its continuing suitability, adequacy and effectiveness. Reviews will include the assessment of opportunities for improvement and the need for changes to the SH&E Management System, SH&E Policy and SH&E objectives. Records of the management reviews will be retained. Input to management reviews may include:

• Results of internal audits.
• Evaluations of compliance with applicable legal requirements and other requirements to which AECOM subscribes.
• The results of participation and consultation.
• Relevant communication(s) from external interested parties, including complaints.
• The SH&E performance of the organization.
• The extent to which objectives have been met.
• Status of incident investigations.
• Review of significant environmental aspects and impacts.
• Status of corrective actions and preventive actions.
• Follow-up actions from previous management reviews.
• Changing circumstances, including developments in legal and other SH&E requirements.
• Recommendations for improvement.

The outputs from management reviews will be consistent with the organization’s commitment to continual improvement and will include any decisions and actions related to possible changes to:

• SH&E performance.
• SH&E policy and objectives.
• Resources.
• Other elements of the SH&E management system.

Relevant outputs from management review will be made available for communication and consultation.

2.5 Document Control and Retention

2.5.1 Location of Documents

Documents in the SH&E Management System can be found on Ecosystem, the company intranet. SH&E Management System documents shall be obtained directly from Ecosystem to ensure the most current version is in use. Documentation that relates to projects will be kept with project files under the control of the Project Manager. Documentation that relates to AECOM locations will be kept in location under control of the Project Manager or designee.

2.5.2 Review and Approval

Documents in the SH&E Management System shall be reviewed periodically as required. Recommendation for new documents, updates or changes to existing documents shall be escalated through the SH&E Management System Change Request Process.
Procedures (S3 documents) shall be reviewed and, where necessary, updated twice yearly. Off-cycle updates or changes may be made in the event of a High Potential or high actual consequence (HiPo) incident or regulatory change. Subject matter experts shall be consulted as necessary and regulatory requirement reviews conducted at suitable intervals to meet AECOM’s SH&E objectives and commitments and to ensure legal compliance. Records of consultations and reviews shall be maintained as appropriate.

Where such updates occur, the SH&E Directors are responsible for seeking views from a selection of appropriate employees before new processes and procedures are fully implemented. Changes will be approved for issue by the SH&E Directors. A summary of changes shall be made available and displayed on the company intranet, and employees informed through team briefings, bulletins, emails, notice boards and newsletters, etc. Project-related documents will be reviewed and approved by the Project Manager or other appointed persons as appropriate.

Current versions of the SH&E Management System, Policy and procedures are available on the company intranet. The SH&E Management System, Policy and procedures are controlled documents. Paper copies of the documents may be in circulation but are uncontrolled and shall be checked for accuracy before use. Obsolete documents and data will be removed from all points of issue and use.

2.5.3 Records Management & Retention

Records shall be kept to comply with applicable jurisdictional recordkeeping requirements, in accordance with the AECOM Records Retention Procedure, and to demonstrate the SH&E Management System operates effectively and processes have been carried out under safe conditions. Records that shall be kept include but are not limited to:

- Training records (including orientation / induction).
- SH&E inspection reports.
- SH&E audit reports.
- Incident reports.
- Monitoring and testing reports.
- Medical surveillance and fit test records.
- Field logs and records of exposure to substances hazardous to health.
- Maintenance and calibration records.
- Records of emergency response drills.
- Management reviews.
- Risk assessments and SH&E Plans including revisions.
- Client-specific SH&E documentation.
- SH&E related insurance certificates.
- Waste management documents.
- Permits, licenses and vehicle records.

Records will be stored in a safe place, will be readily retrievable, and protected from deterioration. Sensitive data and private personal information will be protected through strict confidentiality measures and restricted access.

Retention periods may be in excess of 50 years (as defined in the AECOM Records Retention Procedure, any further Business Group-specific records retention procedure, or by local legislation) and required approvals shall be sought prior to any disposal of records.
3. Attachments

3.1 S2-001-ATT1 Life Preserving Principles

3.2 S2-001-ATT2 Terms & Definitions

3.3 S2-001-ATT3 Minimum Global Safety, Health & Environmental Requirements

3.4 S2-001-ATT4 Catastrophic and Critical Consequences Guidance

3.5 S2-001-ATT5 Location-Specific Pandemic Planning

3.6 S2-001-ATT6 Potential Coronavirus Exposure Management and Reporting

3.7 S2-001-FM1 Executive Incident Review Template

3.8 S2-001-FM2 Location-Specific Pandemic Plan Template

3.9 S2-001-FM3 Pandemic Planning and Execution Inspection

3.10 S2-001-FM4 Coronavirus Response: Workplace Readiness Checklist

4. Change Log

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<th>Change Date</th>
<th>Description of Change</th>
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<td>June 15, 2015</td>
<td>Complete rewrite – integration of URS &amp; AECOM programs</td>
<td>Various locations</td>
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<td>Refer to SH&amp;E Management System Manual Edit Summary – August 2016</td>
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<td>May 3, 2019</td>
<td>Add S2-001-ATT4 link</td>
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<td>August 20, 2020</td>
<td>Added links S2-001-ATT5, S2-001-ATT6, S2-001-FM1, S2-001-FM2, S2-001-FM3, and S2-001-FM4</td>
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<td>July 2, 2021</td>
<td>Replaced ‘VP SH&amp;E’ with ‘SH&amp;E Director’ throughout Added “(S2-001-ATT4 Catastrophic &amp; Critical Consequences Guidance functions as a resource in the project’s risk assessment process)” Updated IPM Model Replaced S2-001-ATT4 High Risk Events Guidance with S2-001-ATT4 Catastrophic and Critical Consequences Guidance</td>
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