

ABM MODERN SLAVERY ACT STATEMENT

ABM Industries Incorporated, its UK subsidiary ABM International (Holdings) Limited (“ABMIH”), and ABMIH’s subsidiaries, ABM Group UK Limited, Omni Serv Limited, and Westway Services Holdings Limited (2014) (collectively “ABM”), recognise that the respect for human rights is an integral part of their social responsibility and are committed to responsible sourcing and hiring in an effort to eradicate human trafficking and slavery in our supply chain.

The Modern Slavery Act 2015 (“MSA”) requires commercial organisations with business operations in the UK above a certain revenue threshold to publish an anti-slavery and human trafficking statement each financial year to disclose the steps the organisation has taken to ensure there is no slavery or trafficking in its supply chains or its own business.

Given that the MSA was only recently introduced, our approach to tackling the issues of modern slavery will inevitably evolve over time. This financial year, ABM has taken initial steps to identify opportunities to enable us to develop our policies and training to combat modern slavery and further develop our global compliance program.

CODE OF BUSINESS CONDUCT: ABM’s Code of Business Conduct (“COBC”) requires all ABM employees and third parties working with ABM, including suppliers, to comply with all national, federal, state and local laws concerning the workplace in the jurisdictions where they operate. Violation of the COBC may result in termination of a supplier or employee.

SUPPLIER CONTRACTS: ABM’s standard supplier contracts currently require suppliers to comply with all local laws but are being reviewed to ensure compliance with current international labour standards. We propose to ensure that our key external supply contracts contain relevant binding provisions requiring our suppliers trade ethically and take appropriate steps to avoid slavery and trafficking in their business.

RISK ASSESSMENT AND ACTION PLAN: ABM began a risk assessment in 2016, with the goal of creating a global compliance plan in 2017 that includes our commitment to MSA requirements. Once the risk assessment is complete, we will review our supplier contract language and COBC to ensure that ABM labour sourcing policies and practices meet with appropriate international standards and the highest level of business integrity. The results of ABM’s risk assessment will allow us to prioritise on-site audits of those suppliers and international locations most at risk for responsible labour sourcing challenges to enable us to take the necessary action to combat modern slavery. ABM anticipates that it may conduct such audits through its own personnel or through a third party independent auditor on an announced or unannounced basis.

As we expand our business activities and work with suppliers domestically and globally to meet customers’ needs, ABM remains committed to human rights and safety in our supply chain and further steps will be taken in the next financial year to build on the above.

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes ABM's anti-slavery and human trafficking statement for the financial year ending October 31, 2016.

A handwritten signature in black ink, appearing to read 'A Donnell', is positioned above the printed name.

Andy Donnell
On behalf of ABM GROUP UK LIMITED