



ABM MODERN SLAVERY and HUMAN TRAFFICKING STATEMENT

FOR FINANCIAL YEAR ENDING OCTOBER 31, 2023

Introduction

This statement has been prepared in compliance with the requirements of section 54 of the Modern Slavery Act 2015 (the “Act”). ABM has adopted a zero-tolerance approach to modern slavery. This statement sets out the actions that we have taken and are continuing to take to assess and prevent any incidents of modern slavery within our business and supply chain.

This constitutes our Modern Slavery and Human Trafficking Statement for our fiscal year ended October 31, 2023, and the information set out in this statement is correct as of the date of publication.

Our Organisation

ABM Industries Incorporated is a U.S. public company that is traded on the New York Stock Exchange (“ABM”). ABM, which operates through its subsidiaries, is one of the world’s largest providers of facilities services and solutions. In the United Kingdom, ABM operates through its UK subsidiary, ABM International (Holdings) Limited (“ABMI”), and ABMI’s subsidiaries, ABM Aviation UK Limited, ABM Group UK Limited, ABM Facility Services UK Limited, ABM Technical Solutions Limited, ABM Critical Solutions Limited, and Momentum Support Limited, trading as ABM Ireland in Northern Ireland (collectively, the “ABM UK Companies”).

The ABM UK Companies employ ~10k team members to deliver comprehensive stand-alone or integrated facility services to clients in more than 1600 locations. We support some of the UK’s busiest buildings, airports, venues, public infrastructure, industrial operations, and commercial real estate.

Our Supply Chain

Due to the expansive nature of our service delivery offerings, the ABM UK Companies operate a wide-ranging supply chain. We are engaged with ~3,000 suppliers with a total annual spend of ~£83m. We understand that our business activities sometimes necessitate engagement with suppliers who represent a higher-than-average risk in relation to potential incidents of modern slavery. We have identified our higher risk suppliers, who are audited at a greater frequency to ensure that they are able to demonstrate and maintain an acceptable level of compliance in this area.

Our supply chain includes products and services provided by suppliers across a broad range of sectors, including cleaning materials and cleaning equipment, electrical components, fire and security services, manned guarding, waste services, workwear, and recruitment. From time to time, the ABM UK Companies use agency labour or subcontractors to supply services to our clients.

Our Policies

ABM and the ABM UK Companies believe that modern slavery is a crime and a human rights violation and fully support the aims of the Act. Our team members are critical to our success, and we are committed to ensuring that our operations are free from forced labour, slavery, and human trafficking. Under no circumstances will ABM tolerate forced labour, slavery, or human trafficking in any form, in any part of our business or supply chain.

Code of Business Conduct

Our Code of Business Conduct reflects our adherence to ethical standards and commitment to do the right thing wherever we do business. Our Code of Business Conduct makes clear that:

ABM does not tolerate the use of child labor, any acts of modern slavery, human trafficking, or other illegal, abusive, or forced labor practices. This includes compliance with internationally recognized laws and regulations in all locations where we operate, regardless of local business customs. We strive to provide safe and secure conditions for those working on the Company's behalf.

We reinforce the requirements of our Code of Business Conduct through our internal policies and procedures to ensure that our team members and supply chain partners are conducting business in an ethical and transparent manner. All ABM staff and management level team members and Board members must complete an annual training and recertification of ABM's Code of Business Conduct, which includes mandatory disclosure of any violations or areas of concern.

In 2023, 100% of assigned ABM UK Companies team members completed their annual Code of Business Conduct training.

In addition to our Code of Business Conduct, we maintain an extensive suite of policies to reinforce our obligation to protect all of our direct and indirect team members from poor treatment and/or exploitation, which comply with all respective laws and regulations. Our policies cover, amongst other requirements, fair pay rates, fair terms and conditions of employment, access to representation, and access to training and development opportunities.

The following ABM policies and procedures further support our commitment to preventing slavery and human trafficking:

Modern Slavery Policy

In 2023, ABM adopted an enterprise-wide Modern Slavery Policy that memorialised the company's zero-tolerance approach to modern slavery. This policy applies to all Directors, Officers, and team members of ABM, and all third parties acting on behalf of ABM, including contractors, agents, representatives, consultants, franchisees, and partners.

Corporate Responsibility Report

As one of the largest facilities services providers in the world, we recognize the important role ABM plays across a wide range of industries, and are constantly working to integrate and align Environmental, Social, and Governance (ESG) practices into our operations and delivered services.

For more information on ABM's current ESG efforts see our annual [ESG Impact Report](#).

Recruitment Policy

The ABM UK Companies maintain a standalone Recruitment Policy which is reviewed and updated on an annual basis to ensure it meets current professionally recommended guidelines and is aligned to current legislation. In line with the policy, we operate under robust recruitment processes, including:

- Conducting Eligibility to Work in the UK checks for all employed team members.
- Following an intuitive process via a Right to Work application to conduct compliant Right to Work checks which is automatically updated to reflect the prevailing Home Office legislation.
- Completing facial recognition and biometric readings as part of the Right to Work application to ensure that the documents provided are authentic and meet current legal requirements.
- Working only with recruitment agencies on approved frameworks which are audited to provide assurance that pre-employment clearance has been obtained for agency staff.

Equality, Diversity & Inclusion Policy

ABM supports and promotes equality, diversity, and inclusion in all its employment policies and practices. All team members are to be treated fairly and with respect at work, in an environment free from discrimination. This policy outlines ABM's approach to avoiding and eliminating discrimination in all aspects of employment, and for educating line managers and team members about discrimination.

Safeguarding Policy

ABM recognises that the safety of children and vulnerable adults is a collective responsibility. Accordingly, we have developed this policy to ensure that anyone working on behalf of ABM who comes into contact with children and vulnerable adults understands they have a role to play to protect these vulnerable populations from harm arising from contact with anyone acting on behalf of ABM.

Dignity at Work Policy

ABM's aim is to provide a working environment that respects the rights of each team member and a place where team members treat each other with respect at all times. Any behaviour that undermines this is unacceptable at ABM. ABM is committed to an inclusive and supportive working environment for all its team members, which is free from harassment, bullying, discrimination, or abuse from team members, clients, or ABM service users. ABM does not tolerate team members being treated badly or unfairly.

This policy outlines the standards of behaviour expected from team members and the support available for team members who feel bullied, harassed, or discriminated against.

Grievance & Mediation Policy

ABM understands that from time-to-time team members may have problems or concerns regarding their work, working environment, or relationships with other team members that they wish to highlight either informally with their line manager, or through more formal procedures. This policy clearly sets forth each team member's right to submit a grievance that will be promptly and appropriately handled by ABM management.

ABM aims to deal with grievances fairly and speedily to get to the root of the concerns as quickly as possible and in accordance with the policy.

Whistleblowing Policy

ABM strives to achieve the highest standards of openness, integrity, and accountability and an important aspect of accountability and transparency is a mechanism to enable team members and other individuals working for ABM to be able to voice concerns in a responsible and effective manner. Where a team member discovers information which they believe shows serious malpractice or wrongdoing, the information can be disclosed internally without fear of reprisal.

We embrace our whistleblowing policy which lets all team members know that they can raise concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain, without fear of reprisals.

Confidential Ethics & Compliance Hotline

ABM is committed to ensuring all team members feel safe and understand individual responsibility to report any violations of any of our policies or applicable law. ABM's Compliance Hotline, which is accessible by phone or online, administered by a third party, and always available, is one of several options team members have for reporting violations or concerns.

Our Compliance Hotline can take reports in any language and as a part of our commitment to confidentiality and respect, accepts reports anonymously. All hotline reports are recorded in an internal database and immediately reviewed by members of our human resources, legal and audit teams, with further immediate escalation if appropriate. The Audit Committee of the ABM Board of Directors receives an update on the frequency, status, and outcome of all hotline investigations on a quarterly basis.

Risk Assessment and Due Diligence

On a continuing basis, ABM has taken active steps to minimise the risk of modern slavery by assigning ultimate responsibility for addressing slavery and human trafficking to our Board, Directors, and Senior Management. We have a well-established Modern Slavery Working Group made up of human resources, operations, procurement, learning & development, legal, and QHSE representatives who meet on a regular basis to discuss, develop, improve, and implement modern slavery policies and procedures and to review progress to date on both our internal and external facing efforts to prevent modern slavery.

Our Workforce

In addition to the onboarding processes outlined in our Recruitment Policy, to uncover and prevent forced labour in our own workforce we routinely perform a number of assessments, including:

- Systematically checking bank accounts to identify unrelated workers paid into a single account.
- Checking contact information provided by team members to review if multiple matches occur.
- Reviewing team member documents for the same next of kin and/or same place of origin/location in home country.
- Checking emergency contact numbers to identify seemingly unrelated workers who are contactable through the same number.

Supplier Due Diligence

The ABM UK Companies also conduct varying levels of due diligence on our supply chain depending on our assessment of the potential risk presented by each supplier relationship. This due diligence is employed from the needs/tender stage onwards.

ABM acknowledges that certain products and services, by their nature and/or origin present a higher risk of modern slavery. ABM's evaluation of the potential risk posed by an individual supplier considers the following elements:

- The sector in which they operate.
- The nature of their operation.
- Their business practices.
- The geographical locations of their operation(s)/supply chain(s).
- The demographic of their workforce.

All of our suppliers are required to engage in the ABM Supplier Pre-Qualification process, which specifically includes questions regarding modern slavery and our wider ESG efforts.

Supplier Code of Conduct

Our ABM [Supplier Code of Conduct](#) requires all suppliers to comply with applicable labour laws and regulations and to treat workers with dignity and respect. In addition, our standard subcontracting agreements also include robust provisions that stipulate that our subcontractors and agencies must comply with applicable anti-slavery laws and must be transparent with their actions in this regard to allow ABM to monitor performance.

As part of our contracts with each supplier, we require that they confirm to us that:

- They have taken steps to eradicate modern slavery within their business;
- They hold their own suppliers to account over modern slavery;
- They pay their employees at least the national minimum wage;
- For international suppliers, that they pay their employees any prevailing minimum wage applicable within their country of operations; and
- We may terminate their contract at any time should any instances of modern slavery come to light.

Supplier Audit Programme

In 2023, ABM implemented an extensive supplier audit programme to further address the potential risk of modern slavery within our various supply chains. Participation in the programme is a mandatory, ongoing requirement of our suppliers if they wish to continue to work with ABM in any capacity. The audit programme further supports the initial vetting done during the supplier set up process and provides ABM with confidence that each supplier has an ongoing commitment to managing modern slavery within their business and supply chain.

Under the audit programme, all ABM suppliers are required to complete our ABM ESG Audit Questionnaire which asks specific questions of suppliers based on identified potential risks. Supplier responses to the questionnaire are reviewed and scored, and where applicable, the necessary

documents must be provided by the supplier to evidence compliance. An overall compliance score is assigned following completion of the audit so that ABM can track progress and address with any supplier any responses which are deemed to fall short of the expected standard. The questionnaire is focused to drive and measure supplier compliance in the following risk areas:

<i>ABM Supplier Audit Area of Compliance</i>
<i>COMPLIANCE & ALIGNMENT WITH ABM POLICY & PROCEDURE</i>
<i>SPECIFIC INSURANCE</i>
<i>FINANCIAL</i>
<i>DATA PROTECTION & INFORMATION SECURITY</i>
<i>DIVERSITY, EQUITY AND INCLUSION (DEI)</i>
<i>ENVIRONMENT</i>
<i>MODERN SLAVERY</i>
<i>SOCIAL</i>
<i>TEAM MEMBER DEVELOPMENT & SUPPORT</i>
<i>ETHICAL & ECONOMIC SOURCING</i>

Performance is reported monthly for review at the most senior level within our business and non-compliance is appropriately followed up with formal meetings. Upon discovery of a potential issue, we work closely with our suppliers to improve their scoring.

If a supplier consistently scores below ABM expectations or fails to show continuous improvement in the audit, ABM will encourage and work with the supplier to improve their processes before auditing the supplier again six (6) months later. If improvement cannot be evidenced, ABM will take appropriate action to secure an alternative supplier.

➤ **Audit Programme Scope & Rationale**

ABM initially targeted our higher risk, biggest spend categories to maximise the impact and coverage of the audit programme. The areas of our supply chain we initially addressed included the following:

- Recruitment
- Cleaning Supplies/Hygiene
- Electrical
- Fire, Alarms & Security & Manned Guarding
- Workwear

We recently extended the programme to begin engaging with all of our largest preferred suppliers as well.

Engagement with our supply partners has been very encouraging and is a clear indication of their commitment to address any potential risks within their businesses. We have shared the outcomes of

the performed audits with our suppliers, and clearly identified any areas where we believe the audited suppliers may have additional work to do in order to meet our expectations in terms of acceptable levels of compliance.

➤ **Results So Far**

So far, ABM has kicked off audits of all of our designated high-risk suppliers and all remaining preferred suppliers, who collectively represent over 35% of our total supply chain spend. Our initial audit scoring has evidenced a reassuring level of compliance by our suppliers.

Whilst we are finding that our suppliers are meeting or exceeding our expectations in terms of their overall compliance, we have also identified some potential shortfalls which will require further attention. We have committed to a follow up programme of continual assessment of our suppliers to both improve overall compliance and to strengthen collaborative efforts to prevent slavery in our supply chains.

During 2024-25 it is ABM's intention to further expand the audit programme to include all of our direct suppliers and subcontractors. Our objective is to ensure that we are auditing and scoring our top 95% of suppliers by spend by 2025 and to provide detailed reporting on the audit scoring achieved by those suppliers.

Third Party Monitoring

In addition to our internal compliance controls, ABM also utilises a third-party monitoring tool which provides us with further evaluation measures and analysis of our ESG compliance metrics.

Our subscribed suppliers are requested to complete an accreditation process by responding to a number of compliance modules which are then assessed by our third-party provider.

The assessed outcomes are measured by our third-party partner and made available to us via a portal in the form of comprehensive data with supporting dashboard reports. This is an ongoing assessment tool, and once the supplier has completed the initial accreditation process, they will be periodically monitored throughout the lifetime of our partnership.

Training

ABM is dedicated to the ongoing training and development of our team members. Our internal training portal – ABM University (ABMU) – is a central repository for all our mandatory training modules. Every team member has a tailored training programme which is relevant to their job role. Completion rates are monitored and reported at a senior level. The completion rates for our required compliance trainings regularly exceed 95% and we generally achieve 100% completion of required trainings by our UK team members.

Our modern slavery training is a key module within our mandatory training programme. This is delivered at induction and then on at least an annual basis to ensure our teams are fully up to date with the current legislation and are appropriately equipped to identify and report any potential incidents of modern slavery. The training is completed via an e-Learning module which engages various methods to educate the trainee including videos, potential scenarios, and quizzes to test individual understanding.

In 2023, we continued to evolve our approach to raising awareness of modern slavery by further expanding our e-Learning module. In addition to delivering training to our senior leadership and management level team members, we expanded the training to successfully implement a single revised module for all ABM UK team members. The updated training module is delivered in five (5) languages (English, Spanish, Polish, Portuguese & Ukrainian). The trainee can complete the course in stages if preferred and can revisit sections to reassert learning at any time.

The key aims of this training is:

- To consistently raise awareness in order to help our team members to identify signs of slavery in our business and supply chain.
- To review the legal implications under the Act, give real-life scenarios and practical steps to identify and act on modern slavery abuses across all parts of our supply chain.
- To ensure that our team members understand how they can report any potential incidents of modern slavery safely, confidentially, and without retaliation.

We understand that compliance with the Act requires continuous diligence, and we regularly collaborate with our clients and business partners to stay abreast of successful training methods being employed across the UK and participate in industry working groups focused on sharing best practices. In 2024, we intend to further extend this collaboration to invite our supply chain partners to complete our modern slavery training module.

Our Performance Indicators

To better support our commitment to eradicating slavery and human trafficking within our business, ABM is developing stringent key performance indicators (KPI) that will measure our overall compliance in terms of our internal performance and that of our supply chain partners.

For 2024-25, we intend to realign our performance measurements to better reflect our compliance position which will give us more effective indicators to assist us in developing and tailoring our compliance solutions going forward. We are also implementing practices and procedures to measure and report on the following planned KPIs:

KPI Category	Training	Risk Awareness	Incident Reporting / Management	Risk Follow Up Action
Objective	<i>Train all employees</i>	<i>Measure level of supply chain risk</i>	<i>Capture all reported risks</i>	<i>Follow up all reported risks</i>
Measures	% of employees who have completed assigned training modules	% Compliance achieved in each measured ESG category	No. of potential incidents reported and outcomes	% of reported risks followed up within a pre-defined target timescale
	% of suppliers who have completed assigned training modules	% of High-Risk suppliers who are fully compliant	No. of whistle blows and outcomes	% of identified risks where issue has been remedied

Reporting	% Overall completion - tracked movement via trend reports	% Overall Compliance - tracked movement	% of satisfactory incident close out / % repeat incidents	% overall risk score measurement
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The steps that we are taking to ensure that slavery and human trafficking are not taking place within our business or supply chain will only be fully effective if:

- No reports are received from team members, the public, or law enforcement agencies to indicate that modern slavery practices have been identified; and
- We maintain good levels of communication and personal contact with our supply chain partners and confirm their understanding and compliance with our expectations.

For 2023, ABM did not receive any reports to indicate that modern slavery practices were occurring in either our own workforce or our supply chain.

Reporting A Concern

All ABM UK team members, as part of their modern slavery training, are made aware of how to report a potential incident.

ABM strongly encourages use of its Compliance Hotline and other reporting methods to confidentially report a concern and ABM is strictly committed to the enforcement of our anti-retaliation policies.

ABM team members and suppliers are encouraged to raise ethical or legal concerns regarding not only modern slavery and the ABM practices and policies covered in this statement, but also any other activity related to any ABM company or our suppliers through the following channels:

1. ABM’s Compliance Hotline is an entirely anonymous, third-party service set up for team members and third parties to report, in any language, possible violations of law, ABM’s Code of Business Conduct, or other ABM policies, and is available 24 hours a day, seven days a week:
 - a. By phone at:
 - i. 1-877-ALERT-04 (1-877-253-7804) for the US
 - ii. 0800-069-8801 for the UK
 - iii. 1-800-903-224 for Ireland
 - b. Online at:
 - i. abmhotline.ethicspoint.com for the US
 - ii. abmhotlineeurope.ethicspoint.com for the UK and Ireland;
2. By mail to ABM corporate headquarters, addressed to ABM Ethics and Compliance, ABM Industries Incorporated, One Liberty Plaza, 7th Floor, New York, NY 10006, United States.

Approval and Signature

This annual statement has been prepared by ABM's subject matter experts responsible for supporting ABM's efforts to address human rights risks in our operations and supply chains. The statement was reviewed by cross-functional stakeholders including representatives and leaders from our global and local legal, human resources, sustainability, and procurement teams and Directors from each reporting entity.

This statement was approved by the ABM UK Directors and covers all activities undertaken by the ABM UK Companies.

A handwritten signature in black ink, appearing to read 'R. Sykes', followed by a horizontal line and a period.

Richard Sykes
ABM SVP and President, UK and Ireland
March 2024