

ABM 2020 MODERN SLAVERY and HUMAN TRAFFICKING STATEMENT

Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the “Act”) and sets out the steps that we have taken and are continuing to take to ensure that modern slavery and human trafficking are not taking place within our business or UK supply chain. This constitutes our Modern Slavery and Human Trafficking Statement for our fiscal year ended October 31, 2020, and the information set out in this statement is correct as of the date of publication.

Our organisation and supply chain

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 a leading US provider of facilities services with operations in the United Kingdom. In the UK, ABM operates through its UK subsidiary, ABM International (Holdings) Limited (“ABMI”), and ABMI’s subsidiaries, ABM Aviation UK Limited, ABM Group UK Limited, ABM Technical Solutions Limited, and ABM Critical Solutions Limited (collectively, the “ABM UK Companies”). The ABM UK Companies offer stand-alone or integrated facility services to clients throughout the UK and specialize in providing support services to the aviation, public, commercial, retail, and financial sectors, amongst others, at over 1,500 locations across the UK. Our supply chains include, amongst others, subcontractors who deliver services to various clients in the private and public sectors and providers of goods that we use in our business operations. From time to time, the ABM UK Companies use agency labour or subcontractors to supply services to our clients.

Our Policies on slavery and human trafficking

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 employees are critical to our success and we are committed to operating free from forced labour, slavery and human trafficking. We do not tolerate forced labour, slavery or human trafficking in any form, in any part of our business or supply chain. 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 “we will not tolerate human trafficking or forced labour in any part of our business activities or anywhere within our supply chain around the world.” We reinforce the requirements of our Code of Business Conduct through our internal policies and procedures to ensure that our employees and supply chain partners are conducting business in an ethical and transparent manner. These policies and procedures include:

- Recruitment. We operate under robust recruitment policies and procedures, including conducting eligibility to work in the UK checks for all employed staff, and working only with agencies on approved frameworks which are audited to provide assurance that pre-employment clearance has been obtained for agency staff.
- Equal Opportunities. We have a range of policies and controls to protect staff from poor treatment and/or exploitation, which comply with all respective laws and regulations. These include provision of fair pay rates, fair terms and conditions of employment, and access to training and development opportunities.

- Supply Chain. All ABM suppliers are subject to contractual requirements to ensure compliance with anti-slavery legal obligations and to allow ABM to audit their compliance as further detailed below.
- Whistleblowing Policy. We embrace our whistleblowing policy that lets all employees 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.

Risk assessment and due diligence

On a continuing basis, the ABM UK Companies have taken active steps to minimise the risk of modern slavery by assigning responsibility for addressing slavery and human trafficking to the board, director, and senior manager levels. In addition, 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 employees to review if multiple matches occur, reviewing employee documents for the same next of kin and/or same place of origin/location in home country and checking emergency contact numbers to identify seemingly unrelated workers who are contactable through the same number.

We established a Modern Slavery Working Group made up of HR, Operations, Procurement, L&D, Legal and QHSE representatives who meet to discuss, implement and develop modern slavery policies and procedures and to review progress to date.

The ABM UK Companies also conduct varying levels of due diligence on our business partners depending on our assessment of the potential risk presented by that relationship. All of our suppliers are required to complete an ABM Group Supplier request form, which specifically includes questions regarding modern day slavery, and we include robust provisions in our standard subcontracting agreements to require our subcontractors and agencies to comply with applicable anti-slavery laws and to be transparent with their actions in this regard to allow ABM to monitor performance. In addition, 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.

In 2021 ABM UK is introducing Modern slavery audits to key suppliers and suppliers deemed to present a potential higher risk. These audits will complement the initial vetting done during the supplier set up process and provide confidence that these suppliers have an ongoing commitment to managing Modern Slavery within their business and supply chain. If a supplier 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 no improvements have been made in the previous six (6) months, ABM will take appropriate action to secure an alternative supplier.

I. Covid 19 Pandemic

We acknowledge that the COVID-19 pandemic presented unique and unprecedented challenges in 2020 that increased the risk of modern slavery in our business and supply chains, and we took steps to guard

against those increased risks within our organisation and supply chains. ABM UK conducted COVID-19 secure risk assessments in all parts of our business to help us formulate mitigation plans to protect the health and safety of our colleagues. While our non-essential employees were mandated to work from home, all of our employees have continued to receive regular company communications throughout the pandemic and all employees continued to have access to our usual support and grievance procedures. We continued to adhere to our recruitment processes during the pandemic, adapting them as necessary in line with Government guidance. For example, we undertook right to work checks for new colleagues via digital means in accordance with the Government's temporary process. We supported suppliers during the pandemic by continuing to pay for orders promptly and we worked closely with suppliers throughout the period to source essential products and minimise interruptions in the supply to our customers.

We are continuously monitoring the situation and reviewing our existing measures in line with Government guidance. Our leadership has been kept up to date throughout the pandemic regarding risk levels and is actively involved in determining any adjustments that need to be made to existing measures.

Training

We regularly conduct training for all staff on the requirements of the Act, how to spot risks of modern slavery and human trafficking and how to report concerns. In 2020 ABM UK rolled out a Modern Slavery Toolbox Talk, through which over a thousand employees have been trained across the business on raising awareness about Modern Slavery, different types of exploitation, human trafficking, warning signs, and establish the reporting process.

In 2021, we plan to roll out a more in-depth MSA e-learning module for 750 potential users to raise awareness on how to identify signs of slavery in the supply chain. This training will be essential for all managers, supervisors, buyers/procurement team, head office support staff, especially for those team members who are directly involved in the recruitment process or dealing with suppliers. We understand that compliance with the Act requires continuous diligence and we regularly collaborate with our customers 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.

Our performance indicators

The steps that we are taking to ensure that slavery and human trafficking are not taking place within our business or supply chain will be effective if:

- No reports are received from employees, 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 2020, the ABM UK Companies 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

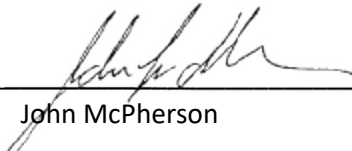
In 2020, ABM UK reviewed its grievance mechanisms and improved its reporting processes by establishing an ABM UK and Ireland Compliance Hotline.

Employees and suppliers are encouraged to raise ethical or legal concerns regarding the ABM UK Companies or our supplier via the ABM Compliance Hotline; by phone at 0800-069-8801 for the UK, at 1800903224 for Ireland or online at: abmhotlineeurope.ethicspoint.com. The calls and web intake can be made 24 hours a day, 7 days a week, in any language and anonymously if preferred.

On behalf of:

ABM International (Holdings) Limited

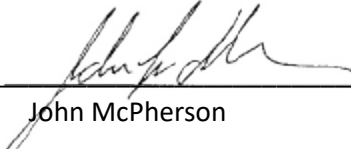
By: 
Antony Richard Marke

By: 
John McPherson

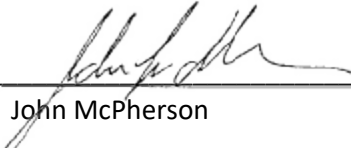
ABM Aviation UK Limited

By: 
Antony Richard Marke

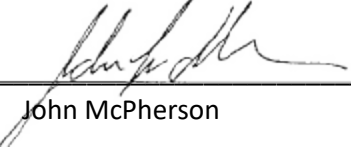
ABM Critical Solutions Limited

By: 
John McPherson

ABM Group UK Limited

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ABM Technical Solutions Limited

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