

ABM 2022 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, 2022, 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, ABM Critical Solutions Limited, and Momentum Support Limited, trading as ABM Ireland in Northern Ireland (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 operate 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. Our recruiting managers follow 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. The Right to Work application completes facial recognition and biometric reading to ensure that the document provided is authentic and meets the legal current requirements. We also only work 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 or employees 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, develop, and implement 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 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 2022, ABM UK expanded its modern slavery audits of key suppliers and suppliers deemed to present a potential higher risk. These audits 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. Momentum Acquisition

In 2022, ABM completed its acquisition of Momentum Support in Ireland, which includes Momentum Support Limited, trading as ABM Ireland in Northern Ireland. In 2017, Momentum Support (including its entities trading in the Republic of Ireland) issued their Modern Slavery and Human Trafficking Policy. ABM and ABM UK are currently evaluating Momentum's existing policies and practices related to modern slavery to determine any adjustments that need to be made to existing measures and to ensure alignment with ABM's existing practices.

Training

We regularly conduct training for all staff and management on the requirements of the Act, how to spot risks of modern slavery and human trafficking and how to report concerns. In 2022, ABM UK continued to evolve our approach to raising awareness of modern slavery by expanding on the e-Learning modules we had created in 2021 for our senior leadership and management level employees and launching a single revised module for all staff and management. We delivered our updated module in five (5) languages (English, Spanish, Polish, Portuguese & Ukrainian). The aim of these trainings was to continue to raise awareness and help employees to identify signs of slavery in the business and supply chain, to review the legal implications under the Modern Slavery Act and give real-life scenarios and practical steps to identify and act on modern slavery abuses across all parts of the supply chain.

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 2022, 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

ABM strongly encourages use of its Compliance Hotline and other reporting processes as part of our many enterprise-wide compliance trainings and strictly enforces our anti-retaliation policies.


ABM employees and suppliers are encouraged to raise ethical or legal concerns regarding the ABM UK Companies or our suppliers through the following channels:

1. ABM's Compliance Hotline (at 0800-069-8801 for the UK, and 1-800-903-224 for Ireland) is an entirely anonymous, third-party service set up for employees and third parties to report 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;

2. Online at: abmhotlineeurope.ethicspoint.com for the UK and Ireland;
3. 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.


On behalf of:

ABM International (Holdings) Limited

By:  _____
Jim Niblock

By:  _____
John McPherson

ABM Aviation UK Limited

By:  _____
Jim Niblock

ABM Critical Solutions Limited

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ABM Group UK Limited

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ABM Technical Solutions Limited

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John McPherson

Momentum Support Limited, trading as ABM Ireland

By:  _____
Ian Anderson