



## Modern Slavery Policy

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### General Description

#### Purpose / Overview:

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, forced and compulsory labor, human trafficking, and child labor. This Policy reflects ABM Industries Incorporated's and our subsidiaries' (collectively, "ABM," the "Company," "our," "we") commitment to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing systems and controls to ensure modern slavery is not taking place in ABM's business or our supply chain.

#### Scope:

This Modern Slavery Policy (the "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.

Any team member that violates this Policy may be subject to disciplinary actions, up to and including, termination of employment with the Company.

#### Roles and Responsibilities:

**Policy Owner:** ABM Compliance

Any inquiries related to the application of this Policy should be addressed to the Policy Owner. Changes and updates to this Policy should be made by the Policy Owner and approved by the General Counsel.

No exceptions to this Policy are permitted without the written approval of the Policy Owner.

This Policy should be reviewed, and if necessary updated, at least every eighteen (18) months or more often if changes in the regulatory environment or other circumstances warrant an update.

**Modern Slavery** is a term used to encapsulate situations where threats or deception are used to exploit victims and undermine or deprive them of their freedom. The term encompasses, without limitation:

- a. **Child labor:** relates to the exploitation of children through any form of work that deprives them from their childhood.

- b. **Forced or compulsory labor:** situations in which persons are forced to work through the use of violence or intimidation, or by more subtle means such as accumulated debt, retention of identity papers or threats of denunciation to immigration authorities.
- c. **Human trafficking:** relates to arranging or facilitating the travel/movement of a person for the purposes of exploitation through modern slavery. The offense can be committed even where the victim consents to the travel, as the victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult.
- d. **Slavery and servitude:** this is where people are dehumanized, treated as a commodity, bought or sold as "property", have restrictions placed on their freedom, or are generally exploited for someone else's gain.

**Supplier:** any external third party that ABM has entered into a business or contractual relationship to provide business services, goods, functions, or activities.

**Supply chains:** the products and services (including labor) that contribute to ABM's products and services. This includes products and services sourced in the US, UK, and Ireland and extends beyond direct suppliers.

## Policy

### Policy Detail:

ABM has a zero-tolerance approach to modern slavery. Our Code of Business Conduct makes clear that:

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**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.**

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We have a range of policies and controls to protect our team members 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. 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.

As part of our commitment to ethical business practices, we hold our suppliers to the same high standards. ABM's Supplier Code of Conduct obligates all of our suppliers to comply with all applicable laws, respect the

human rights of workers, and treat their employees with dignity and respect in a healthy and safe workplace. In addition, ABM requires its suppliers to identify, mitigate, and address risks and instances of modern slavery in their supply chains and business operations. We have a robust governance structure in place and all ABM suppliers are subject to contractual requirements to ensure compliance with anti-slavery legal obligations and to allow ABM to audit their compliance.

ABM will continue to assess our business and supply chains to identify potential modern slavery risks and target those areas with policies, procedures, and trainings to ensure we maintain appropriate safeguards to mitigate those risks.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. In the UK and Ireland, our annual Modern Slavery Statement reflects the commitments outlined in this Policy and is signed by our UK and Ireland Directors once approved by ABM Compliance. The approved statement is published on the ABM.CO.UK website, within six (6) months of financial year-end, pursuant to Section 54(1) of the Modern Slavery Act 2015.

### **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 enforce our anti-retaliation policies.

ABM team members and suppliers are encouraged to raise ethical or legal concerns regarding not only this Policy, 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 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:
    1. 1-877-ALERT-04 (1-877-253-7804) for the US
    2. 0800-069-8801 for the UK
    3. 1-800-903-224 for Ireland
  - b. Online at:
    1. [abmhotline.ethicspoint.com](http://abmhotline.ethicspoint.com) for the US
    2. [abmhotlineeurope.ethicspoint.com](http://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, 7<sup>th</sup> Floor, New York, NY 10006, United States.

## Related Documents

### Helpful Information:

[Modern Slavery Statement](#)  
[Supplier Code of Conduct](#)  
[Code of Business Conduct](#)

## Revision Management

### Revision History Log:

Revision #:	Date:	Nature of Change:	Recorded By:
v2.1	5/8/2024 11:28 AM	Updated the Modern Slavery Statement Link.	Christine Galante
v2.0	4/29/2024 10:41 AM	Updated the Modern Slavery Statement for 2024.	Christine Galante
v1.0	9/12/2023 10:35 AM	New document	Marta Domanska