



ABM 2026 MODERN SLAVERY and HUMAN TRAFFICKING STATEMENT

2026 - FOR FINANCIAL YEAR ENDING OCTOBER 31, 2025

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, 2025, 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 and Ireland, 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, Momentum Support Limited, trading as ABM Ireland in Northern Ireland, and Maybin Support Services, Momentum Property Services, and LMC FM Limited, trading as ABM Ireland in the Republic of Ireland (collectively, the “ABM UK & I Companies”).

The ABM UK & I Companies employ ~15k 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 and Ireland’s busiest buildings, airports, venues, public infrastructure, industrial operations, and commercial real estate.

I. LMC FM Limited Acquisition

In 2025, ABM completed its acquisition of LMC FM Limited in Ireland. ABM is currently evaluating LMC’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.

Our Supply Chain

Due to the expansive nature of our service delivery offerings, the ABM UK & I Companies operate a wide-ranging supply chain. We are engaged with ~1,500 suppliers with a total annual spend of ~£109m. 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 subject to enhanced levels of third-party compliance review and monitoring 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 & I Companies use agency labour or subcontractors to supply services to our clients.

Our Policies

ABM and the ABM UK & I 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 doing 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 conduct business in an ethical and transparent manner. As discussed in further detail below, we only engage with suppliers that share our high ethical standards and have committed to our Supplier Code of Conduct.

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 2025, 100% of assigned ABM UK & I 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. This policy is reviewed and reissued annually to ensure it aligns to current legislation.

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 we are constantly working to integrate and align responsible business practices into our operations and delivered services.

For more information on ABM's current corporate responsibility-related efforts see our annual [Corporate Responsibility Report](#).

Recruitment Policy

The ABM UK & I 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, Home Office guidance and industry best practice. In line with the policy, we operate robust and technology enabled recruitment and onboarding processes, including:

- Conducting compliant Right to Work checks in the UK & Ireland for all team members prior to employment.
- Utilising the Rightcheck digital Right to Work system, which is aligned to current Home Office requirements and automatically updated in line with legislative changes of the Home Office and Department of Justice - Immigration Service Delivery (ISD).
- Completing biometric and facial recognition verification through the Right to Work system to validate document authenticity and reduce the risk of identity fraud.
- Conducting regular Right to Work checks to ensure ongoing compliance and identify anomalies.
- Working only with recruitment agencies on approved frameworks which are audited to provide assurance that pre-employment clearance has been obtained for agency staff.

Culture & Inclusion Policy

ABM supports and promotes a work environment that embraces each unique person on our team. Our employment policies and practices are guided to foster our inclusive workplace culture that is supportive and respectful toward all team members. Diversity, equity, and inclusion are at the core of our inclusive workplace culture. All team members are to be treated fairly and with respect to 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, compliance, and audit teams, with further immediate escalation if appropriate. We promptly investigate hotline reports and take immediate action where warranted, including escalation and remediation as 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, ABM has implemented enhanced

and ongoing monitoring controls, supported by third party regular audits and data led analysis, to identify and prevent forced labour in our own workforce. These controls include:

- Conducting regular Right to Work audit checks to ensure continued compliance.
- Performing bank account verification checks to identify multiple team members being paid into a single account, which may indicate coercion or control.
- Reviewing contact information to identify shared details across unrelated individuals.
- Reviewing team member records to identify duplicate next of kin and patterns relating to place of origin.
- Checking emergency contact numbers to identify shared contact points across multiple team members.

These measures enable ABM to proactively identify indicators of modern slavery and take timely and appropriate action where risks are identified.

Supplier Due Diligence

The ABM UK & I 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.
- Our contract with them will be terminated should any instances of modern slavery come to light.

Supplier Audit Programme

In 2025 we continued to enhance our supplier audit programme through enhanced data collection, verification, and scoring capabilities to provide greater confidence that each of our suppliers has an ongoing commitment to managing modern slavery within their business and supply chain. Participation in the programme is a mandatory, on-going requirement of our suppliers if they wish to continue to work with ABM in any capacity. Our objective in 2024 was to ensure that we assessed and scored our top 75% of suppliers by spend by the end of 2025, this we achieved, providing detailed reporting on the audit scoring achieved by those suppliers. For 2026 we will continue to increase that target.

All ABM suppliers are required to complete our updated ABM ESG Questionnaire which asks specific questions of suppliers based on identified potential risks. Supplier responses to the questionnaire will be reviewed and scored, and where applicable, the necessary documents must be provided by the supplier to evidence compliance. An overall compliance score will be assigned following completion of the audit so that ABM can track progress and address any supplier deficiencies. 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>CULTURE & INCLUSION</i>
<i>FAIR & INCLUSIVE EMPLOYMENT</i>
<i>HEALTH & SAFETY</i>
<i>ERADICATING MODERN SLAVERY</i>
<i>SOCIAL & PEOPLE RESPONSIBILITY</i>
<i>SUPPORTING COMMUNITY & BUSINESS DEVELOPMENT</i>
<i>ACHIEVING ENVIRONMENTAL SUSTAINABILITY & NET ZERO</i>

Performance will continue to be reported monthly for review at the most senior level within our business and non-compliance will be appropriately followed up with formal meetings. Upon discovery of a potential issue, we will continue to 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 are continually expanding the scope of the programme to engage with a broader population of our supply chain.

Engagement thus far with our supply partners has been very encouraging and is a clear indication of their commitment to addressing 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 suppliers may have additional work to do in order to meet our expectations in terms of acceptable levels of compliance.

Third Party Monitoring

In addition to our internal compliance controls, ABM also utilises third-party audit support through Avetta which provides us with further evaluation measures on 95% of supplier spend providing analysis against 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.

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.

Based on learnings from our audit programme rollout activities in 2024 and 2025, we continue to calibrate 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 continuing to implement practices and procedures that will enable us 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

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 2025, ABM did not receive any reports to indicate that modern slavery practices were occurring in either our own workforce or our supply chain.

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 & I team members (for 2025 our UK & I team members achieved 100% completion for both our COBC and modern slavery trainings).

Our modern slavery training is a key module within our mandatory training programme. The training is delivered at induction and then on at least an annual basis to ensure our team members are fully up to date with the current legislation, including obligations under the Modern Slavery Act 2015 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.

The key aims of this training are:

- To consistently raise awareness 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 Ireland and participate in industry working groups focused on sharing best practices.

Reporting A Concern

All ABM UK & I 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 & I Directors and covers all activities undertaken by the ABM UK & I Companies.



Richard Sykes
ABM SVP and President, UK and Ireland
March 2026