

# Amentum Modern Slavery Statement 2025

## Introduction

This Modern Slavery statement is made on behalf of all wholly-owned subsidiaries and affiliates of Amentum Holdings, Inc. and its group of companies that have reporting obligations under the U.K. Modern Slavery Act 2015 or the Australia Modern Slavery Act 2018 (“Amentum”). This statement was prepared in consultation with Amentum leaders representing the operations, legal and supply chain teams, for the period ending September 2024, and applies (but is not limited) to the following entities and their UK and Australia affiliates<sup>1</sup>:

- a. Amentum Australia Pty Limited
- b. Amentum Clean Energy Limited
- c. Amentum Enterprise Asset Solutions Construction Limited
- d. Amentum Enterprise Asset Solutions Limited
- e. Energy, Safety & Risk Consultants (UK) Limited
- f. Energy, Security and Technology UK Limited
- g. Amentum (U.K.) Ltd.

## Our structure, operations and supply chain

Amentum is a global leader in advanced engineering and innovative technology solutions, trusted by the United States, United Kingdom, Australia and their allies to address their most significant and complex challenges in defence, science, intelligence, security and sustainability. Our people apply undaunted curiosity, relentless ambition and boundless imagination to challenge convention and drive progress. Our commitments are underpinned by the belief that safety, collaboration, employee engagement and well-being are integral to success. Headquartered in Chantilly, Virginia, we have more than 53,000 employees in approximately 80 countries across all 7 continents.

Amentum provides our customers with consulting and professional services, proprietary technologies, and integrated solutions including portfolio, program and project management, operations and maintenance services, training solutions; space solutions; environmental remediation; cyber, digital, and modern software engineering; intelligent asset management; decommissioning and regeneration solutions; integrated waste management; full lifecycle design, build, commission and operation of nuclear facilities and sites; and management of special nuclear materials.

Our workforce consists of employees and other personnel who are committed to Amentum’s mission of bringing advanced engineering and technology solutions to the most significant challenges in science, security, and sustainability.

Our supply chain is critical to our success. Amentum partners with subcontractors, vendors, consultants, agents, intermediaries, suppliers and other business affiliates (“Business Partners”) to provide its services in support of our customers’ missions. We expect our Business Partners, as part of the global value chain, to share our values and embrace our high ethical standards and practices, respecting human rights in all aspects of their operations and delivery of their products and services. Our Business Partners must comply with all applicable laws and with Amentum’s Business Partner Code of Conduct (or, in some instances, our customers’ or the Business Partners’ own Codes of Conduct that cover the same principles as Amentum’s Code).

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<sup>1</sup> On September 27, 2004, Amentum announced the completion of its merger with Jacobs Solutions Inc.’s Critical Mission Solutions and Cyber and Intelligence businesses.

## Commitment

As part of our commitment to our global community, Amentum maintains positive, productive work environments and upholds individual human rights in both our policies and our actions. We respect the employment laws of the locations in which we conduct business. We do not tolerate the use of forced labour, child labour, or human trafficking. International organisations and countries have adopted policies prohibiting trafficking in persons. Amentum is committed to complying with such policies and has instituted its own policies to address modern day slavery.

Amentum's compliance measures against modern day slavery are outlined in its Code of Conduct - [AM-ETH-PL-0001-AM Code of Conduct](#), and its suite of policies and procedures that address modern slavery ("Anti-Slavery Policies"). In addition, Amentum employees may be subject to additional customer or contract-specific anti-slavery policies.

## Risks of Modern Slavery practices in operations and supply chains

We are committed to identifying and addressing risks by assessing potential vulnerabilities, conducting due diligence, and working closely with our partners to promote ethical labour practices and compliance with human rights policies and applicable laws. Amentum's operations are generally considered to have a low risk of modern slavery; however, we remain proactive in identifying and addressing risk areas associated with geography, sector and industry, supply chain complexity, business models and labour practice, and products and services. During this period, we reviewed our practices, strengthened our supplier management framework and reviewed our supply chain to identify areas of high-risk (such as IT and cleaning sectors). We remain committed to effectively managing and mitigate risks of modern slavery within our supply chain.

## Supply Chain Compliance

Risks may potentially arise from the engagement of Business Partners who provide labour to perform work on Amentum's behalf. Business Partners are vetted in accordance with Amentum's due diligence policies prior to the start of the business relationship. Continued monitoring of higher risk Business Partners is conducted throughout the course of the business relationship. In addition, all Business Partners agree to Amentum's [AM-ETH-PL-0002-AM Business Partner Code of Conduct](#) (or, in some instances, our customers' or the Business Partners' own Codes of Conduct that cover the same principles as Amentum's Code) and terms and conditions mandating compliance with applicable anti-slavery laws. Specifically, Amentum's Business Partners are required to:

- a. adhere to regulations prohibiting human trafficking, forced, bonded or
- b. indentured labour,
- c. educate employees on prohibited human trafficking activities,
- d. refrain from violating the rights of others,
- e. immediately address and promptly disclose to Amentum any adverse human
- f. rights impact of their operations,
- g. discipline employees found to have violated the law or rules, and
- h. notify Amentum of suspected or known violations and action taken against employees.

## Our actions to assess and address modern slavery risks

### Policy & Procedures

Amentum's policy and procedures prohibit employees from engaging in activities related to the unlawful trafficking of persons. This includes but is not limited to the types of activities described below:

- a. Procuring commercial sex acts,
- b. Using forced labour in the performance of a contract,

- c. Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority,
- d. Using misleading or fraudulent practices during the recruitment of employees or offering of employment,
- e. Using recruiters that do not operate in accordance with local labour laws of the country in which the recruiting takes place,
- f. Charging any employee or potential employee recruitment fees, and
- g. Where applicable, providing or arranging housing that fails to meet the host country housing and safety standards.

Amentum's procedures detail additional monitoring, auditing, and compliance measures that the company takes to ensure compliance with applicable modern slavery laws throughout the organisation and its supply chain.

## Training

Every year, Amentum employees complete the company's mandatory ethics training, which includes a module on anti-slavery compliance. The module outlines Amentum's Anti-Slavery Policies and the company's expectations of its employees' compliance with such requirements. In addition to the annual training, Amentum administers targeted anti-slavery training to employees supporting contracts that may be affiliated with higher anti-slavery risks, such as locations of performance and volume of subcontracted personnel that migrate from their home country to the country where the work is being performed. We have enhanced our awareness of modern slavery through training and are continuously refining our framework.

## Monitoring

Amentum monitors its activities to ensure compliance with anti-slavery requirements. Our monitoring methods may include unannounced audits, housing inspections, safety inspections, personnel interviews, reviews of employment agreements, and confirmation that personnel have access to their identity documents. Amentum's anti-slavery procedures include sample audit and inspection checklists that can be used and customized by any Amentum program. Any gaps that are identified through the monitoring process are escalated to the appropriate internal compliance teams, who subsequently track and ensure completion of any corresponding corrective actions.

## Our approach to assessing effectiveness

Amentum continuously monitors the external business environment for any changes that may affect the company's exposure, allowing us to adapt our risk management and oversight practices proactively, which may include policy and procedure reviews, training and awareness programs, supplier due diligence and monitoring, stakeholder engagement and internal and third-party audits.

## Reporting

Amentum instructs all its employees to report suspected or known violations of its policies. Reporting channels include supervisors, higher level managers, and the Ethics and Compliance Team. Alternatively, concerns may also be raised to [Amentum's Ethics Hotline](#), which allows individuals to raise complaints anonymously, 24 hours a day, 7 days a week. Live telephone language interpretation is available in 150+ languages, which allows reporters to raise concerns to the hotline in their native language, if they wish to do so. Reporting channels are publicised through channels such as posters at physical locations, electronic all-employee communications, targeted manager communications, leadership town halls, Amentum's external-facing website, the employee intranet, and through internal trainings. Investigations & Enforcement Amentum investigates all credible allegations of anti-slavery violations in accordance with the company's internal investigations policy and procedures.

Amentum discloses such matters to its customer and/or the applicable government bodies in accordance with applicable laws and contractual requirements. In addition, Amentum ensures that corrective actions are implemented which can include personnel disciplinary action, process improvements, or necessary trainings.

### **Our consultation process**

Amentum has communicated our commitments and actions to combat modern slavery across our group of companies, ensuring the relevant areas of our operations are aware of the necessary actions to be taken in identifying, assessing and addressing modern slavery risks in our supply chains.

### **Our commitment**

Amentum is committed to continuously revisiting its compliance program related to modern day slavery, and to incorporate industry best practices to strengthen and improve its compliance program over time. This statement will be reviewed and updated on an annual basis in accordance with Section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015 and the Australia Modern Slavery Act 2018.

This Modern Slavery Statement has been approved by the Boards of Directors of the below entities on the following dates:

- a. Amentum Australia Pty Limited- 19 March 2025  
Mike Walkington,  
Managing Director, Amentum Australia Pty Ltd
- b. Amentum Clean Energy Limited- 21 March 2025
- c. Amentum Enterprise Asset Solutions Construction Limited- 21 March 2025
- d. Amentum Enterprise Asset Solutions Limited- 21 March 2025
- e. Energy, Safety & Risk Consultants (UK) Limited- 20 March 2025
- f. Energy, Security and Technology UK Limited- 21 March 2025
- g. Amentum UK (Ltd) – 20 March 2025

Entities (b) through (g) above has delegated authority to Amentum's Chief Ethics and Compliance Officer to sign this statement on their behalf.

Karina Vollmer  
Chief Ethics and Compliance Officer