

Amentum (UK) LTD Modern Slavery Statement (FY 2024)

Introduction

Amentum (UK) LTD ("Amentum") provides professional technical services to customers, including integrated portfolio, programme & project management; waste-informed decommissioning; integrated waste management; 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 creating a safer, smarter, cleaner world. 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 labor, child labor, 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](#) and its suite of combatting trafficking in persons ("CTIP") policies and procedures. In addition, Amentum employees may be subject to additional customer or contract specific CTIP policies.

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:

- Procuring commercial sex acts;
- Using forced labor in the performance of a contract;
- 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;
- Using misleading or fraudulent practices during the recruitment of employees or offering of employment;
- Using recruiters that do not operate in accordance with local labor laws of the country in which the recruiting takes place;
- Charging any employee or potential employee recruitment fees; and
- 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 CTIP compliance throughout the organisation and its supply chain.

Training

Every year, Amentum employees complete the company's mandatory ethics training, which includes a module on CTIP compliance. The module outlines Amentum's CTIP policy and the company's expectations of its employees'

compliance with such requirements. In addition to the annual training, Amentum administers targeted CTIP training to employees supporting contracts that may be affiliated with higher CTIP risks, such as locations of performance and volume of subcontracted personnel that travel from another country to the country where the work is being performed. The targeted trainings feature interactive case studies and quiz questions to test the trainees' knowledge and understanding of the training content.

Monitoring

Amentum also monitors its activities to ensure compliance with CTIP requirements. Monitoring methods include unannounced audits, housing inspections, safety inspections, personnel interviews, reviews of employment agreements, and confirmation that personnel have access to their own identity documents. Amentum's CTIP 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.

Reporting

Amentum instructs all of its employees to report suspected or known CTIP violations. Reporting channels include supervisors, higher level managers, executive level managers, Amentum's Legal and Human Resources Departments, and the Office of Ethics and Compliance. 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 publicized through posters in break rooms, 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 CTIP 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 to include any personnel disciplinary action, process improvements, or necessary trainings.

Supply Chain Compliance

Amentum often partners with subcontractors, vendors, consultants and suppliers ("Business Partners") to provide its services in support its customers' missions.

Business Partners are vetted in accordance with Amentum's due diligence policies prior to the start of the business relationship, and continued monitoring of higher risk subcontractors are conducted throughout the course of the business relationship. In addition, all Business Partners agree to [Amentum's Business Partner Code of Conduct](#) and terms and conditions mandating compliance with applicable CTIP laws. Specifically, Amentum's Business Partners are required to:

- immediately address and promptly disclose to Amentum any adverse human rights impact of their operations;
- educate employees on prohibited trafficking activities;
- discipline employees found to have violated the law or rules;
- and notify Amentum of suspected or known violations and action taken against employees.

Continuous Improvement

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.

This Modern Slavery Statement has been approved by the Amentum UK (Ltd) Board of Directors on October 4, 2023.

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