

Modern Slavery Act Statement 2023

Jacobs or the Jacobs group of companies refers to Jacobs Solutions Inc. and its direct and indirect subsidiaries collectively. Jacobs' values, global policies, management instructions, and functional procedures apply across the Jacobs group of companies, including the following reporting commercial organizations and reporting entities:

U.K. Modern Slavery Act 2015 Reporting "Commercial Organizations" (collectively, "Jacobs U.K."), including but not limited to:

- ❖ Jacobs U.K. Limited
- ❖ Jacobs Field Services Limited
- ❖ CH2M HILL United Kingdom
- ❖ Halcrow International Partnership
- ❖ Jacobs Clean Energy Limited
- ❖ Energy, Safety & Risk Consultants (U.K.) Limited
- ❖ Jacobs Stobbarts Limited

Australia Modern Slavery Act 2018 "Reporting Entities" (collectively, "Jacobs Australia"), including but not limited to:

- ❖ Jacobs Group Investments Australia Pty Ltd
- ❖ Jacobs Australia Pty Ltd.

This statement is being made by Jacobs, inclusive of Jacobs U.K. and Jacobs Australia, in accordance with the reporting requirements of Section 54, Part 6 of the U.K. Modern Slavery Act 2015 (for Jacobs U.K.) and section 16 of the Australian Modern Slavery Act 2018 (for Jacobs Australia) for the financial year ended 30 September 2022.

Our commitment

At Jacobs, we're challenging today to reinvent tomorrow by solving the world's most critical problems for thriving cities, resilient environments, mission-critical outcomes, operational advancement, scientific discovery and cutting-edge manufacturing, turning abstract ideas into realities that transform the world for good. At Jacobs, we do things right. We always act with integrity – taking responsibility for our work, caring for our people and staying focused on safety and sustainability. In alignment with our values, we are committed to respecting the human rights and dignity of individuals within our operations, supply chain and communities where we do business.

Our structure, operations and supply chain

Jacobs adopted a new holding company structure on [August 29, 2022](#). The name of the new parent company, Jacobs Solutions Inc., more closely aligns with our public identity as a global technology-forward solutions company. Jacobs Solutions Inc. is a publicly held corporation, headquartered in the U.S. and incorporated in the State of Delaware. Leveraging a talent force of more than 60,000, we provide a full spectrum of professional services including consulting, technical, scientific and project delivery for the government and private sector. With \$15 billion in revenue, we operate in over 40 countries and engage over 20,000 suppliers worldwide. Our services fall into our two lines of business: Critical Mission Solutions and People & Places Solutions. As part of the new company strategy, Jacobs announced a new operating unit, Divergent Solutions (DVS). DVS serves as the core foundation for developing and delivering innovative, next-generation cloud, cyber, data and digital technologies. For more information on our company, see our [FY22 10-K](#).

Risks of modern slavery in our operations and supply chains

We are committed to identifying possible modern slavery risks in our operations and supply chains. Jacobs conducts human rights risk assessments, including periodic support from third-party consultants who have supported supply chain mapping efforts. As a result, we update and improve our understanding of our highest risk areas for human rights violations and modern slavery exposure.

Jacobs has considered risk factors in evaluating its risk of modern slavery in its global operations and supply chain, including but not limited to:

- *Sector and industry risks:* as a professional services company that provides solutions to a diverse range of clients, in some countries some business engagements identify us with a higher risk sector or industry.
- *Geographic risks:* some of the countries in which we operate have higher risks of modern slavery due to poor governance or socio-economic factors.
- *Product and services risks:* in some countries some products and services used in our supply chain are identified as higher risk, such as services that involve manual labor or foreign migrant workers.

Given that Jacobs U.K. and Jacobs Australia primarily provide professional services to clients, combined with the nature and type of those professional services, both Jacobs U.K. and Jacobs Australia believe there is low risk of human rights violations and modern slavery in their respective operations and supply chains. Jacobs is committed to continually improving its approach to identifying modern slavery risks in its supply chains and operations around the globe, including further engagement of third parties to conduct risk assessments and provide expertise on enhancing our approach.

Our actions to assess and address modern slavery risks

Policy

Jacobs' **Human Rights Policy** details our commitment to respecting the human rights and dignity of individuals within our operations, supply chain and communities where we do business around the world. This policy is guided by international principles including those encompassed in the United Nations Guiding Principles on Business and Human Rights, Universal Declaration of Human Rights, International Bill of Rights, and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

Updated in 2022, Jacobs' **Supplier Code of Conduct** prohibits the use of any form of forced labor, child labor, human trafficking, and modern slavery. It includes additional requirements including those addressing freedom of association and collective bargaining, recruitment fees, fair wages, non-discrimination, grievance, provision of remedy, and access to personal identification documents. This Supplier Code of Conduct applies to all our suppliers, vendors and subcontractors.

Due diligence

We conduct due diligence to avoid complicity in human rights abuses, and we seek to avoid causing or contributing to adverse human rights impacts through our own activities and business relationships. Supporting our **Human Rights Policy**, Jacobs has integrated a human rights questionnaire into its supplier pre-qualification process. Enhanced assessment occurs for suppliers based on risk triggers, which can include geography, activity type and other risk factors.

Contracting and certification

Our standard contracts stipulate that suppliers will comply with all applicable laws, rules and regulations including those related to human trafficking, worker welfare and modern slavery. We also require that suppliers certify compliance with our **Supplier Code of Conduct**, including its human rights provisions.

Auditing and assessment

As outlined in our **Supplier Code of Conduct**, we reserve the right to conduct audits and thoroughly investigate possible non-compliance with our requirements. We strive to be prompt and fair in our investigations and, whenever possible, operate in a spirit of continuous improvement – working with suppliers to implement change within specified timeframes. Any violations of our Supplier Code of Conduct or failure to cooperate in an

audit or investigation may jeopardize suppliers' business relationship with us, up to and including termination of contracts.

Training

Jacobs' annual **Code of Conduct** training is required of all employees. It includes information on our commitment to respecting human rights and dignity in accordance with the U.K. and Australian Modern Slavery Acts and the United Nations Guiding Principles on Business & Human Rights, as well as our expectations of employees to act in a manner consistent with our **Human Rights Policy**. Our training for supply management professionals includes a section on our **Supplier Code of Conduct**, which includes human rights requirements. More detailed guidance is provided to employees engaged in human rights assessments during supplier pre-qualification. Additional modern slavery training is under review and being developed for deployment.

Engagement

Jacobs recognizes the importance of stakeholder engagement to create a more connected, sustainable world. Jacobs is a **participant** in the **United Nations Global Compact** and is proud to have been a founding member of Building Responsibly, an industry group collaborating to promote the rights and welfare of workers globally. In 2022, Jacobs continued its partnership with **BSR** (Business for Social Responsibility), via which we engage with third-party experts and engage in cross-industry collaboration to collectively advance our sustainability strategies and impacts, including human rights.

We also seek to assist our clients in these areas, including by responding to client surveys in relation to Jacobs' policies and processes, and sharing strategies and control measures to reduce human rights and modern slavery risks within their operations and supply chains.

Our approach to assessing effectiveness

Key performance indicators

We are committed to continual improvement in managing human rights and modern slavery risk in Jacobs' supply chain. To evaluate our performance, we consider both qualitative and quantitative indicators, including but not limited to those related to supplier qualification and certification, audits and assessments, training, client engagement, and external benchmarking.

Reporting

We encourage our employees, suppliers and stakeholders to speak up, without retribution, about any concerns regarding human rights and modern slavery in our

operations or supply chain. As detailed in our [Supplier Code of Conduct](#) and on our [website](#), anyone can submit a report anonymously through the Jacobs Integrity Hotline at integrity.jacobs.com or by calling 844.543.8351 (U.S.), 1.800.316.728 (Australia) and 0808.234.6029 (U.K.). We are committed to investigating reports in an appropriately robust and timely manner.

Our consultation process

We communicated our commitments and actions in combatting modern slavery to the relevant entities in our Jacobs group of companies, inclusive of Jacobs U.K. and Jacobs Australia. We have ensured that relevant areas of Jacobs' operations are aware of what actions need to be taken to identify, assess, and address modern slavery risks in our operations and supply chains.

This statement was approved by Jacobs Group Investments Australia Pty Ltd on 22 March 2023.

This statement was approved by Jacobs Australia Pty Ltd on 17 March 2023.

This statement was approved by the boards of the Jacobs U.K. entities (including but not limited to Jacobs U.K. Limited, Jacobs Field Services Limited, CH2M HILL United Kingdom, Halcrow International Partnership, Jacobs Clean Energy Limited, Energy, Safety & Risk Consultants (U.K.) Limited, and Jacobs Stobbarts Limited) on 28 March 2023.



Joanne Caruso
EVP, Chief Legal and Administrative Officer