

### INTRODUCTION

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ABM is committed to ethical business practices and we hold our suppliers to the same high standards. It is ABM policy to comply with all applicable laws and regulations of the countries and regions in which we operate and to conduct our business activities in an honest and ethical manner. This ABM Supplier Code of Conduct requires all suppliers to uphold the policies of ABM concerning compliance with all applicable laws, respect for human rights, environmental conservation and the safety of products and services. This Code is maintained and updated to reflect ABM standards and its requirements are applicable to all suppliers of ABM Industries and its affiliates and subsidiaries globally. For purposes of this Code, a “Supplier” is defined as any external third party that ABM has entered into a business or contractual relationship to provide business services, goods, functions, or activities.

### CODE OF CONDUCT

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#### **A. Compliance with Laws**

The ABM Supplier Code of Conduct establishes standards to ensure that workers are treated with respect and dignity in a healthy and safe workplace, and that business operations are environmentally responsible and conducted ethically. Fundamental to adopting the Code is that a business, in all of its activities, must operate in full compliance with the laws, rules and regulations of the countries in which it operates. The Code encourages Suppliers to go beyond legal compliance, drawing upon internationally recognized standards, in order to advance social and environmental responsibility and business ethics.

#### **B. Labor**

Suppliers must be committed to upholding the human rights of workers, and to treating their employees with dignity and respect. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

- 1) Suppliers shall only employ workers who meet applicable minimum legal age requirements and shall comply with all other applicable child labor laws according to local regulations.
- 2) Suppliers shall not use any indentured, involuntary or forced labor, slavery or servitude. All work must be voluntary and workers shall be free to leave work at any time or terminate their employment.
- 3) Suppliers shall set working hours, wages and over-time pay in compliance with all applicable laws. Workers shall be paid at least the minimum legal wage or a wage that meets local industry standards, whichever is greater.
- 4) Suppliers shall treat employees with dignity and respect and will not engage in or permit corporal punishment, retaliation, threats of violence, or any form of harassment whether based on gender, race, color, religion, ethnicity, age, sexual orientation, national origin, disability, or any other legally protected characteristic. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.
- 5) Suppliers shall affirm that they are an Equal Opportunity Employer and that they shall employ workers on the basis of their ability to do the job, not on the basis of their personal characteristics or beliefs. Suppliers shall not engage in discrimination based on race, color, gender, sexual orientation, nationality, disability, religion, age, maternity, political affiliation, union membership, marital status or any other protected characteristic in hiring and employment practices.
- 6) Suppliers shall respect employees’ right to join or not join any lawful organization, including trade unions, and shall comply with all applicable local and national laws pertaining to freedom of association and collective bargaining.
- 7) Suppliers shall recruit, screen, interview, complete any required and permitted background checks or drug tests, and hire their own employees in accordance with all applicable laws.

#### **C. Health and Safety**

Suppliers recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and health work environment enhances the quality of products and services, consistency of production and worker retention and morale. Suppliers also recognize that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace.

- 1) While Suppliers are on-site at an ABM location or at an ABM customer location on behalf of ABM, Suppliers shall comply with ABM’s safety standards and any site-specific requirements.
- 2) Suppliers shall ensure a safe work environment and minimize physical and chemical hazards through proper design, engineering and administrative controls, preventative maintenance and safe work procedures as well as ongoing safety training. Workers shall not be disciplined for raising safety concerns.

- 3) Suppliers shall provide workers with appropriate personal protective equipment where hazards cannot be adequately controlled by other means.
- 4) Suppliers shall provide and properly maintain physical guards, interlocks, and barriers where machinery presents an injury hazard to workers.
- 5) Suppliers shall minimize the impact of emergency situations through the implementation of emergency plans and response procedures.
- 6) Suppliers shall establish procedures and systems to prevent, manage, track and report occupational injury and illness, including provisions to: a) encourage worker reporting; b) classify and record injury and illness cases; c) provide necessary medical treatment; d) investigate cases and implement corrective actions to eliminate their causes; and d) facilitate return of workers to work.

**D. Environmental**

Suppliers recognize that environmental responsibility is integral to providing world class services. In performing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public.

- 1) Suppliers shall maintain and keep current all required environmental permits and registrations and follow the operational and reporting requirements of such permits.
- 2) Suppliers shall comply with regulated substance specifications and with any applicable laws and regulations prohibiting or restricting the use or handling of specific substances.
- 3) Supplier shall maintain Material Safety Data Sheets (MSDS) and a list of all products and chemicals used to perform services and will keep copies of same on site. Supplier will immediately report any injuries accidents or spills to ABM.
- 3) Suppliers shall characterize, monitor, control and treat solid waste, wastewater, and air emissions as required prior to discharge or disposal.
- 4) Suppliers shall manage, control, treat and/or dispose of non-hazardous or hazardous solid waste, wastewater, and/or air emissions generated from operations as required by applicable laws and regulations.
- 5) Suppliers shall reduce or eliminate waste of all types, including water and energy, at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.
- 6) Suppliers shall implement green and sustainable business practices and shall strive to conduct its business in a sustainable and energy efficient manner.

**E. Ethics**

To meet social responsibilities and to achieve success in the marketplace, Suppliers and their agents and sub-suppliers are to uphold the highest standards of ethics.

- 1) Suppliers shall prohibit any and all forms of corruption, extortion, and embezzlement by its employees, officers, directors or agents.
- 2) Suppliers shall adhere to standards of fair business, advertising, and competition.
- 3) Suppliers shall not offer or accept bribes, kickbacks or other means to obtain an undue or improper advantage to any ABM employee (or their family members or significant other), representative or customer or to any government/public officials.
- 4) Suppliers shall comply with applicable anti-corruption laws and shall implement monitoring and enforcement procedures to ensure compliance with anti-corruption laws.
- 5) Suppliers shall accurately record and disclose information regarding their business activities, structure, financial condition, and performance in accordance with applicable laws and regulations as well as prevailing industry business practices.
- 6) Suppliers shall not share or exchange any price, cost or other competitive information or undertake any other collusive conduct with any other third party to ABM with respect to any proposed, pending or current ABM procurement.
- 7) Suppliers shall respect intellectual property rights and safeguard customer information. Transfer of technology and know-how shall be done in a manner that protects intellectual property rights.
- 8) Suppliers shall protect the reasonable privacy expectations of personal information of everyone Supplier does business with, including sub-suppliers, suppliers, customers, consumers and employees. Suppliers shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.
- 9) Suppliers shall implement processes to address the confidentiality and protection of an employee whistleblower who in good faith raises a concern, makes a report, or assists with an investigation related to potential ethical or criminal violations.

## **VIOLATIONS OF THE CODE & REPORTING MISCONDUCT**

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Supplier shall promptly report to ABM any known breach of this Code. Upon discovery of any breach of this Code or other observed misconduct, either by Supplier or by ABM, Supplier shall implement a corrective action plan to cure the non-compliance within a specified time period. If the Supplier fails to meet the corrective action plan commitment, ABM may terminate any agreement and/or the business relationship. ABM reserves the right to hold Supplier responsible for reasonable costs of investigating non-compliance.

The ABM Compliance Hotline is a toll-free, confidential, third party service set up for Suppliers to report possible violations of the law, this Policy or other ABM policies. The Hotline is staffed 24 hours per day and calls can be accepted in any language. Callers may make reports anonymously if they choose. The Compliance Hotline can be reached by phone at 1-877-253-7804. Reports are also accepted online at [abmhotline.ethicspoint.com](https://abmhotline.ethicspoint.com). All calls and online reports will be promptly forwarded to ABM's Corporate Headquarters for investigation and review.

Suppliers may also report issues or problems by email to [Compliance@ABM.com](mailto:Compliance@ABM.com) or anonymously by mail addressed to ABM Compliance, ABM Industries Incorporated, One Liberty Plaza, 7<sup>th</sup> Floor, New York, NY 10006.

Any questions regarding this Code should be directed to [VendorCompliance@ABM.com](mailto:VendorCompliance@ABM.com).