

Insights into Building a Leading Ethics & Compliance Program

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AECOM is a global infrastructure consulting firm, delivering professional services throughout the project lifecycle – from planning, design and engineering to program and construction management. AECOM works with public and private sector clients on projects that span transportation, buildings, water, new energy, and the environment.

In the Ethisphere community, you often hear that there is ‘no competition in compliance.’ Leaders like to share successes and best practices so that all can improve programs. This Spotlight with AECOM’s Antonio D’Amico offers a view into how he and his team run their program, involve the senior executive team, and address specific issues.

Ethisphere recently recognized AECOM with Compliance Leader Verification, a distinction for companies with programs that meet or exceed best practices across an array of ethics and compliance benchmarks.

Please tell us about your program—the over-riding principles, the structure and how it has evolved over the past several years.

“ *Our Ethics & Compliance program is founded on the fundamental principle that ethics is every employee’s responsibility. This message is conveyed through our Code of Conduct and communicated by our senior leaders and people managers.*

While we have a centralized Ethics & Compliance corporate team, we work closely with our colleagues from other functions, including operations, to ensure our Code of Conduct, E&C policies, and processes and systems are fully implemented throughout the company.

We are focused on fostering a consistent ethical culture throughout our organization and implementing global processes for third-party due diligence, gifts and entertainment, risk assessments, and investigations has been a big help in that regard.

Is there a key piece of your program that you have enhanced that you would like to share?

“ We have made a considerable effort to develop and implement robust systems for managing anticorruption risks. We worked closely with a vendor to customize their third-party due diligence tool to meet our needs and we have developed another system internally to ensure third-party due diligence and contracting requirements have been completed. We also created a gifts, entertainment, and contributions approval and tracking system that allows employees to complete a form that is then routed to the appropriate approvers when necessary.

In addition, our audit services group created an anticorruption/antibribery continuous monitoring tool that links to various internal and external data sources to help our audit team identify high-risk or suspicious transactions with third parties that require further analysis or investigation.

Gaining visibility for Ethics and Compliance among senior leadership is always a challenge. How do you engage with these stakeholders? What metrics do you share?

“ Our senior leaders are vocal proponents of our ethics and compliance program. In addition to discussions I have with leaders about ethics-related issues that come up, we also hold a quarterly Global Ethics and Compliance Committee (GECC) meeting with our executive leaders. The GECC is co-chaired by our CECO and Chief Legal Officer and includes our CEO, President, CFO, and group operational and functional leaders. The quarterly meeting gives us the opportunity to share, among other things, program updates, investigation statistics, training completion rates, and program and risk assessment findings.

We also hold a monthly ethics call with functional leaders from Legal, HR, and Audit to provide a venue to share regional updates, discuss open investigations, and review hotline statistics with our legal and HR colleagues

AECOM also has other strong program elements—among them, a solid E&C risk assessment process. Can you share a bit more about your approach and ways that others can learn from it?

“ We conduct regular regional risk and program assessments. This allows us to involve regional leaders in the process and identify risks that may be unique to or more prominent in a particular country or region.

In addition to some independent data analysis as part of the assessments, the most critical information we collect comes from interviews of operational and functional leaders, which is followed by a survey of an expanded group of regional managers.

We have obtained valuable and insightful input from all these sources, giving us a better view of our risks and whether there are any gaps in our E&C program, both globally and at a regional level.

AECOM's training completion rates are 100%. How do you incentivize employees to complete the training?

“ We enlist the help of AECOM leaders to emphasize that ethics starts with each employee and that our training is an annual requirement that helps us build culture of integrity and accountability. We refresh the content each year and emphasize different aspects of our program. While topics such as anticorruption are covered every year, recently we began allowing employees to test out of repeated topics and received very positive feedback on that option.

We review the content offerings every year and seek creative input from throughout the organization to determine how best to incentivize our employees to complete training on a timely basis.

Ethisphere recently recognized the AECOM program with Compliance Leader Verification. The process involves a rigorous review of your program and culture. It also involves benchmarking your program against the World's Most Ethical Companies dataset. How has this data and engagement with Ethisphere been helpful for your efforts?

“ The benchmarking data from peer companies and other companies that have leading ethics and compliance practices has provided great insight into particular areas where we can focus our continuous improvement efforts. It has made us aware of some of the innovative ethics and compliance practices that we can learn from in making sure our program is accessible and interesting to our employees.

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The Compliance Leader Verification process confirmed our view that, regardless of how good a compliance program is, it can always be improved. We learned of some evolving best practices related to transparency in reporting ethics and other ESG metrics.
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Perhaps the greatest insights came directly from our own employees, as we included an ethical culture survey in the Compliance Leader Verification process. Our advice to others would be to engage your employees and seek their input to identify areas where an E&C program can be improved.

How do you plan to utilize the Compliance Leader Verification recognition?

“ With clients becoming increasingly concerned about ESG issues, the Compliance Leader Verification recognition provides a valuable third-party verification of the quality of our Ethics & Compliance program. Rather than asking clients and other third parties to take our word for it, we can highlight that a third party has done a rigorous assessment and found that our program addresses all the major risk areas. We anticipate this will give us a competitive advantage over companies that cannot provide clients the same level of comfort in their ethics and compliance program.”

Anything else you would like to share?

“ AECOM has been committed to acting with integrity for many years and is honored to have also been named by Ethisphere in 2021 as one of the World’s Most Ethical Companies for the fifth time. As the World’s Most Ethical Companies process also included a review of AECOM’s corporate responsibility, governance, equity, diversity & inclusion, and sustainability practices, that designation demonstrates AECOM’s commitment to fulfilling its ESG initiatives and to being a model corporate citizen.



Compliance Leader Verification

The Compliance Leader Verification is awarded to companies that have demonstrated a commitment to, and investment in, a leading ethics and compliance program. The process involves a rigorous review of the ethics and compliance program and corporate culture. It also includes taking the Ethics Quotient® (EQ), a questionnaire covering the elements of an effective program, and benchmarking results to the data from the World’s Most Ethical Companies®. Ethisphere’s experts also conduct extensive document review and interviews with executives and stakeholders.



Learn more at www.ethisphere.com/clv and www.ethisphere.com

Ethisphere brings together leading global companies to define and promote best practices for ethics and compliance, and helps to advance business performance through data-driven assessments, benchmarking, and guidance.



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