



# Supplier Code of Conduct

**Atlas Arteria Limited**  
**Atlas Arteria International Limited**

# Supplier Code of Conduct

## Application and Scope

For the purposes of this document, Atlas Arteria means Atlas Arteria Limited ACN 141 075 201, Atlas Arteria International Limited Registration No 43828 and each of their controlled subsidiaries.

At Atlas Arteria, we believe that treating our people, the community and the environment well is a fundamental aspect of our values. For these reasons, we have set out the standards to which we will hold ourselves accountable and we look to partner with suppliers who share the same view.

This Supplier Code of Conduct (**Code**) embodies those standards and outlines the obligations we expect our suppliers to adhere to. This Code applies to all suppliers and their suppliers, agents, contractors and sub-contractors.

We are committed to improving our performance in these areas identified in this Code and expect our suppliers to do the same. We believe that by working together, we will be better placed to identify issues and implement improvements.

## Compliance with this Code

The values, expectations and obligations contained in this Code are important to Atlas Arteria and we expect our suppliers to adhere to them. A supplier's performance in these areas is an important consideration in our procurement decisions.

Any material non-compliance with or breach of this Code (or any of the policies to which it refers) will be investigated and may result in the termination or non-renewal of any existing business relationship with a supplier and potentially a claim for damages.

Our suppliers accept that they will comply with our reasonable requests for information to ensure compliance with our requirements in relation to our:

- [Anti-Bribery and Corruption policy](#);
- Modern slavery mitigation and prevention;
- [Diversity & Inclusion policy](#);
- [Whistleblowing policy](#);
- [Environmental and Social Responsibility policy](#);
- stance against money laundering and terrorist financing; and
- compliance with all applicable laws.

All Atlas Arteria's suppliers have a responsibility to monitor compliance with this Code and to notify us of any actual or suspected breaches and to take reasonable steps to address, remedy and prevent repetition or continuation of any breach of this Code or possible breaches of this Code.

Suppliers must notify us if they become aware of an actual or suspected breach of any of the matters or obligations set out in this Code. All reports under this Code can be made to Atlas Arteria's General Counsel (**Email: [cmccormack@atlasarteria.com](mailto:cmccormack@atlasarteria.com)**) or in accordance with Atlas Arteria's Whistleblower policy (further details of which are set out below).

The notification must be in writing and must include the location, nature and extent of the breach and whether any steps have been taken to remedy or address the breach. The supplier must fully co-operate and comply with Atlas Arteria by responding to all reasonable requests for information to allow a comprehensive investigation to be conducted.

In addition, suppliers must always comply with all regulatory and legislative disclosure and reporting obligations (including all disclosure and reporting obligations in relation to environmental, social and governance matters and privacy and cyber security breaches) applicable to them. Nothing in this Code abrogates those responsibilities.

## Supplier due diligence

We reserve the right to undertake due diligence and risk assessments to verify compliance with this Code and expect our suppliers to co-operate and provide supporting evidence as we may reasonably require to monitor and review their compliance. Suppliers acknowledge and agree to fully co-operate with any such investigations we may carry out. This may include answering questionnaires, participating in interviews, or facilitating on site-visits.

Further, our suppliers will conduct their own due diligence into their businesses, supply chains, agents, contractors and/or sub-contractors. Suppliers must have appropriate due diligence arrangements and controls in place in relation to the third parties they engage for and on behalf of Atlas Arteria. Suppliers will share the methodology and results of their own supply chain due diligence with us, on request.

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## Whistleblowing & Speak Up

All suppliers may report misconduct or a breach of this Code to their main Atlas Arteria point of contact or to Atlas Arteria's General Counsel.

Atlas Arteria also operates a formal Whistleblowing policy which can be found on our website.

Reports under our Whistleblowing policy in relation to this Code can be made to the following Whistleblower Protection Officers listed below:

- Clayton McCormack, General Counsel and Company Secretary  
**Email:** [cmccormack@atlasarteria.com](mailto:cmccormack@atlasarteria.com)
- Vincent Portal-Barrault, Chief Operations Officer  
**Email:** [vportal@atlasarteria.com](mailto:vportal@atlasarteria.com)
- Catherine Brain, Director – Human Resources  
**Email:** [cbrain@atlasarteria.com](mailto:cbrain@atlasarteria.com)

Reports may also be posted to c/- Level 5, 141 Flinders Lane, Melbourne VIC 3000 (marked to the attention of one of the Whistleblower Protection Officers).

In the event a supplier wishes to make a report to an external provider or generally make a report on an anonymous basis, Atlas Arteria's external "Speak Up" service (operated by Deloitte) may be used.

Further details can be found online at [www.atlasarteriaspeakup.deloitte.com.au](http://www.atlasarteriaspeakup.deloitte.com.au) and in our Whistleblowing policy.

Subject to receipt of sufficient information, a matter reported will be investigated and conducted in a manner that is confidential, fair and objective and in accordance with applicable laws.

Atlas Arteria will to the fullest extent required by law, protect the identity of anyone making a report unless the discloser has consented to disclosure of their identity. Further, we have systems in place to prevent any discloser from detrimental acts or omissions because of making a complaint under our Whistleblower policy.

Please refer to our Whistleblower Policy for guidance on how to report breaches or suspected breaches of this Code and for information about Atlas Arteria's policy against retaliation for reporting misconduct in good faith.

## Values

We require our suppliers to uphold our values by applying the five guiding STEER principles: safety, transparency, engagement, environment and respect. A copy of our values can be found on our website.

We are committed to using only those suppliers whose values match our own. Our suppliers are therefore required to comply with all applicable laws and, in all cases, to meet the standards and principles set out in this Code across all areas of their business. Compliance with such laws, standards and principles is a material consideration for us in assessing every aspect of our supplier relationships.

### Anti-bribery and corruption

Our suppliers must comply with all applicable laws relating to the prevention of bribery, corruption, fraud, tax evasion or similar or related activities.

We expect our suppliers to ensure that their activities and those of their suppliers are aligned with our anti-bribery and corruption policy. Even in jurisdictions where it is legally permissible, facilitation payments must not be made in connection with any goods or services supplied to Atlas Arteria.

A copy of our Anti-Bribery and Corruption policy can be found on our website ([www.atlasarteria.com](http://www.atlasarteria.com)).

### Anti-money laundering and counter-terrorism financing

Atlas Arteria is committed to fighting against money laundering and terrorist financing. Our suppliers will ensure that their supply chains, agents, contractors and sub-contractors have no links to or involvement in any money laundering or terrorist financing.

### Diversity and inclusion

Our suppliers must comply with all applicable discrimination laws and actively promote diversity and inclusion within their own workplace, including in recruitment, retention and promotion practices.

Atlas Arteria takes its commitment to diversity and inclusion seriously. It will give preference to suppliers who demonstrate a similar commitment, by choosing to work with suppliers who appoint diverse teams to work with us.

A copy of our Diversity & Inclusion policy can be found on our website ([www.atlasarteria.com](http://www.atlasarteria.com)).

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## Health and safety

Our suppliers must comply with all applicable health and safety laws and aim to create a safe working environment for their employees, sub-contractors and anyone else affected by their businesses.

## Human rights, employment practices & Modern Slavery

Atlas Arteria is committed to ensuring that its businesses do not contribute to, nor inadvertently support, modern slavery.

Our suppliers, whether directly or through their supply chain, must comply with all applicable laws in relation to:

- employment practices and benefits;
- freedom of association;
- discrimination, harassment (physical or sexual) and bullying.

In addition, our suppliers must not engage in or tolerate in its business operations or supply chains the practice of modern slavery, including servitude, human trafficking, forced labour, child labour, debt bondage or other deceptive recruiting tactics for labour or services and any kind of illegal, abusive or exploitative labour, or work which is likely to harm the health, safety or morals of anyone employed, including children.

We expect that our suppliers will actively investigate their own suppliers to ensure that the above requirements are met.

## Privacy & Cyber Security

Our suppliers must comply with all privacy and data security laws applicable to the work for which they are engaged by Atlas Arteria.

Our suppliers must only use confidential and personal information for the purpose for which it was obtained or for an otherwise authorised purpose. Our suppliers must delete all confidential or personal information they have collected from us or on behalf of us upon request.

Our suppliers must maintain confidentiality of all information related to their work with us and take reasonable steps to ensure that any confidential or personal information collected from or on behalf of Atlas Arteria is kept secure and to prevent inadvertent disclosure or access.

We expect our suppliers to implement best practice technical and information technology solutions including appropriate security measures to protect the confidential and personal information against misuse, interference, loss, data corruption or manipulation and unauthorised access, disclosure or modification.

## Fair Competition

Our suppliers must comply with all laws concerning fair market practices and support the principles of fair competition in their business dealing with us.

We expect that our suppliers will not engage in any form of anti-competitive conduct (which is conduct that is unlawful or otherwise restricted or prohibited under any applicable competition or anti-trust law) in its dealings or association with us.

## Sustainability

Our suppliers must comply with all applicable environmental laws and continually strive to improve their sustainability performance, focusing on reduction (as appropriate) of waste, carbon emissions, water and natural resources consumption.

## Review

This Code will be reviewed periodically and updated by us without prior notice.