



MODERN SLAVERY STATEMENT 2022



Contents

» Atlas Arteria

- 3 STEER Principles
- 4 Message from our CEO
- 5 Our journey so far
- 6 About this Statement

» Atlas Arteria's structure and operations

- 8 Our structure
- 9 Our operations

» Atlas Arteria's supply chains

- 11 Corporate level
- 13 Dulles Greenway
- 14 Warnow Tunnel
- 15 Joint Ventures

» Modern slavery risks in Atlas Arteria's operations and supply chains

- 18 Risks of modern slavery in our operations and supply chains

» Modern slavery governance, processes and remediation

- 23 Governance
- 24 Supplier due diligence and engagement
- 26 Grievance mechanism and remediation system
- 29 Training program and capacity building

» Effectiveness of Atlas Arteria's systems

- 31 How effective are our systems?

» Consultation with controlled entities

- 32 Approval

» Appendix

- 33 Appendix – Mandatory reporting criteria

Acknowledgement of Country

Atlas Arteria acknowledges the Traditional Custodians of country throughout Australia, and their connections to land, sea and community. We pay our respects to their Elders past, present and emerging and extend that respect to all Aboriginal and Torres Strait Islander peoples today.

As a global owner, operator and developer of toll roads, we extend our respect to the First Nations custodians in every location where we live and work and to their past, present and ongoing contributions, which enrich our lives and communities. Keeping communities connected is at the heart of what we do; and we do so guided by our values, which encourage respect for all people in every interaction.

STEER Principles

We are Atlas Arteria. We are a global operator and developer of toll roads. We work to create long-term value for our investors through considered and disciplined management and sustainable business practices.

OUR VISION

Our vision is to benefit the communities in which we operate through reduced travel time, greater time certainty, reduced fuel consumption and carbon emissions and to provide an enjoyable travel experience.

OUR VALUES

Our values guide the decisions we make and the way we behave as we work together towards our vision. In living and breathing our values, we can create strong growth for shareholders and better outcomes for our customers, our communities and our people. To us, great performance is as much about how we get there and not just the end result. That's why our people's success is evaluated against our five values, along with their role responsibilities.

OUR GUIDING STEER VALUES

When we are steered by these values, we are acting in the best interests of one another, our securityholders, our customers and our communities. In this way, together, we're driving better outcomes.



Safety is at our heart

We care about our people, partners and customers and believe that their health, safety and wellbeing come first. We are proud to promote a culture of awareness and action where our people take accountability to identify opportunities for change. We want our workplaces to be safe places for all people.



Transparency in all we do

We are open, honest and straightforward in the way we communicate. Our people feel connected to what is happening across our businesses in the way we share information. We take a 'no surprises' approach to keeping people informed and trust each other to do the right thing. We understand the importance of cultivating a safe environment where people know they can speak up at any time.



Engage for better outcomes

We are committed to making meaningful connections that improve the way we work. We are open, curious and challenge constructively. We work hard to ensure that everyone feels heard and that feedback is welcome. We are connected to our purpose and strategy and are committed to working together to deliver.



Environmentally and socially responsible

We understand the responsibility we have to the environment, the community and each other, and we take our commitments seriously. We encourage our people to be curious and look for innovative ways to minimise adverse impacts no matter how big or small.



Respect in every interaction

We expect respect in every interaction. We value the time, perspective, and experience of others and demonstrate that in the way we treat them. We work hard to ensure a truly inclusive workplace where all people feel seen, heard, and valued. We know how important it is to do the right thing and ensure we act ethically, lawfully, and responsibly at all times.

Message from our CEO



I am pleased to present Atlas Arteria's third Modern Slavery Statement. Importantly, we did not identify any instances or receive any reports of modern slavery practices in our operations or supply chains in 2022.

This Statement underscores our proactive approach to reporting on modern slavery and our unwavering commitment to transparency, ethical conduct, and the protection of human rights in line with our STEER principles. Currently, we are not required to report our activities in this space. However, we believe that our responsibilities extend beyond the boundaries of what is required of us by law.

Our commitment to reporting our actions in the fight against modern slavery ensures we consistently improve. It encourages open dialogue with our people and in our supply chain and holds us accountable. In 2023 we anticipate meeting the revenue threshold for mandatory reporting of the *Modern Slavery Act 2018* (Cth) due to the acquisition of a majority interest in the Chicago Skyway in December 2022.

We find ourselves at an opportune moment, with the recent release of the McMillan Report¹ recommendations for strengthening Australia's approach to modern slavery, to reflect on our journey and to outline our plans to continue addressing and assessing modern slavery risks in our business and supply chains.

Since we first started reporting in 2021, the global legal framework imposing human rights mandatory due diligence requirements and reporting obligations on companies has strengthened significantly. This is evidenced by the adoption of new legislation such as:

Germany's Supply Chain Due Diligence Act (LkSG) 2023; the US's Uyghur Forced Labour Prevention Act 2021; Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, the recent review of the Act in Australia; and the upcoming EU Corporate Sustainability Due Diligence Directive.

As the number of reporting entities increases, and reporting quality requirements tighten, so does the transparency surrounding global supply chains, enabling stakeholders to make more informed decisions. This represents a pivotal step in support of our collective efforts to eradicate forced labour and human trafficking. Our hope is that this increased corporate awareness and reporting helps to make a real difference by reducing the likelihood of vulnerable people being drawn into modern slavery.

While Atlas Arteria's operates in and sources goods and services from geographies often considered lower risk from a modern slavery perspective, we remain committed to the continued and robust assessment of potential risks. Accordingly, in 2023, we are broadening our approach by looking at how two of our STEER principles (Transparency and Respect) apply in assessing modern slavery risks and upholding basic human rights.

Human rights are dynamic. We remain cognisant of the influences exerted by global political, social, and environmental factors, on the nature, extent and visibility of the human rights risks Atlas Arteria may encounter. For example, the continued displacement of refugees from the war in Ukraine and other conflict areas increases the likelihood of vulnerable populations in Europe. With a continuous improvement mindset, we will continue to evolve our systems and processes for identifying, assessing and mitigating these risks.

Respecting human rights, including seeking the eradication of modern slavery, necessitates the concerted and continued efforts of all stakeholders to create a brighter future for all.

Graeme Bevans,
CEO and Managing Director, Atlas Arteria

Atlas Arteria's approach to modern slavery is informed by the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption, as embedded in the Ten Principles of the UN Global Compact.

Human Rights

Businesses should:

Principle 1 — support and respect the protection of internationally proclaimed human rights; and

Principle 2 — make sure that they are not complicit in human rights abuses.

Labour

Businesses should:

Principle 3 — uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4 — the elimination of all forms of forced and compulsory labour;

Principle 5 — the effective abolition of child labour; and

Principle 6 — the elimination of discrimination in respect of employment and occupation.

Environment

Businesses should:

Principle 7 — support a precautionary approach to environmental challenges;

Principle 8 — undertake initiatives to promote greater environmental responsibility; and

Principle 9 — encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

Businesses should:

Principle 10 — work against corruption in all its forms, including extortion and bribery.

Our approach is based on:

- UN Guiding Principles on Business and Human Rights
- OECD Due Diligence Guidance for Responsible Business Conduct
- OECD Guidelines for Multinational Enterprises
- UN Guiding Principles Reporting Framework with implementation guidance





We leverage the resources offered by, amongst others:

- [Walk Free](#)
- [Business & Human Rights Resource Centre](#)
- [Shift](#)
- [Human Rights Council \(International Committee of the Red Cross\)](#)
- [Know The Chain](#)

Source: UN Global Compact Network Australia

1. Report on statutory review of the *Modern Slavery Act 2018* (Cth), Professor John McMillan AO, 2023.

Our journey so far

	 2019	 2020	 2021	 2022	 2023+
Milestone	Internalisation of management	Started our modern slavery journey	Publication of our first Modern Slavery Statement for the period 1 January to 31 December 2020	Publication of our second Modern Slavery Statement for the period 1 January to 31 December 2021	Review, and if necessary update, our procedures and systems against anticipated new legal requirements to be laid out following the review of the Act to ensure our readiness across all our operations
Key developments	<ul style="list-style-type: none"> - Atlas Arteria appoints independent management and terminates its management arrangements with Macquarie Group Limited. - Commence building our corporate policy framework, including our Code of Conduct. - Determine our vision and articulating our values (the STEER Principles). - Build the foundation of our corporate governance and culture. 	<ul style="list-style-type: none"> - Atlas Arteria Boards decide to publish a Modern Slavery Statement (as a non-reporting entity under the Act) for transparency in this area. - Work with external advisers to assess and develop a Modern Slavery Risk Framework and supplier risk assessment tool, using a combination of factors, including industry, product offering and geographic risk, to assist in assessing the potential for modern slavery risks in our operations and supply chain. - Conduct supplier risk assessment for all existing Tier 1 suppliers with annual spend above A\$10,000. - Adoption of our Supplier Code of Conduct. - Development of modern slavery supplier questionnaires. - Introduce practice of seeking modern slavery contractual clauses in supplier engagements. 	<ul style="list-style-type: none"> - Review and update of our Supplier Code of Conduct completed. - Training on supplier due diligence process delivered to corporate employees. - Obtain feedback on supplier due diligence process and initiate action to address it, resulting in the implementation of the new due diligence screening tool. - On-board new third-party screening tool to streamline and mature due diligence processes. - All 2021 Corporate, Dulles Greenway and Warnow Tunnel suppliers with spend AUS >\$10,000 screened for risks through new tool. - Process for regular review of flags raised by Supplier Due Diligence screening. - Launch of our 'Atlas Foundations' training program. Training rolled out in 2021 to all corporate office employees and contractors (including detailed training on the requirements of our employee Code of Conduct and modern slavery). 	<ul style="list-style-type: none"> - Commence general identification and assessment of our Tier 2 suppliers and high level analysis of our extended supply chain risk profile. - Review the outsourcing and offshoring practices of our financial and IT suppliers. - Commence developing internal guidelines for responding to any reports of modern slavery in our supply chain. - Integrate human rights considerations in our corporate policies as part of the regular ongoing update and reviewing process. - Conduct a test of internal whistleblowing reporting processes to assess effectiveness. - Establish a Supplier Due Diligence Committee to formalise suppliers' risk assessment and monitoring, and, if necessary, to determine further investigatory action or mitigation measures. 	<ul style="list-style-type: none"> - Continue identification of our Tier 2 (and beyond) suppliers with a focus on high-risks segment of our supply chain. - Continue to embed human rights considerations in our processes and policies. - Raise awareness amongst employees on matters pertaining to business and human rights, including appropriate responses to any reports of human rights violation or modern slavery practices within our supply chain. - Refresh modern slavery training for all employees.

About this Statement

Atlas Arteria is committed to transparency in reporting on the actions we are taking in the fight against modern slavery. Currently, Atlas Arteria does not qualify as a 'reporting entity' under the Modern Slavery Act 2018 (*Cth*) (**Act**)¹ and nor does any other entity in the Atlas Arteria Group. However, leading by example and sharing the actions we take in the fight against modern slavery is important to us. Accordingly, this Statement is aligned with the requirements of the Act and details our actions to assess, address and mitigate the risk of modern slavery in our operations and supply chains in the period 1 January to 31 December 2022.

Atlas Arteria (ASX:ALX) is listed as a stapled structure on the Australian Securities Exchange. It comprises Atlas Arteria Limited (ACN 141 075 201) (ATLAX), an Australian public company, and Atlas Arteria International Limited (Registration No. 43828) (ATLIX), an exempted mutual fund company incorporated in Bermuda. The securities of ATLAX and ATLIX are stapled and must trade and otherwise be dealt with together. In this Statement ATLAX, ATLIX and their controlled subsidiaries are referred to collectively as 'Atlas Arteria'.

The entities and businesses this Statement covers

This Statement is prepared for Atlas Arteria and reports on the activities and operations of our corporate offices and controlled businesses, Dulles Greenway and Warnow Tunnel. It also includes high level information on the relevant procedures and practices of Atlas Arteria's joint ventures, the Chicago Skyway and APRR.

All parts of our business work together to manage modern slavery risks and have contributed to the preparation of this Statement.

This Modern Slavery Statement was approved by the Board of Atlas Arteria Limited and Atlas Arteria International Limited on 22 June 2023.



1. As at 31 December 2022.

ATLAS ARTERIA'S STRUCTURE AND OPERATIONS



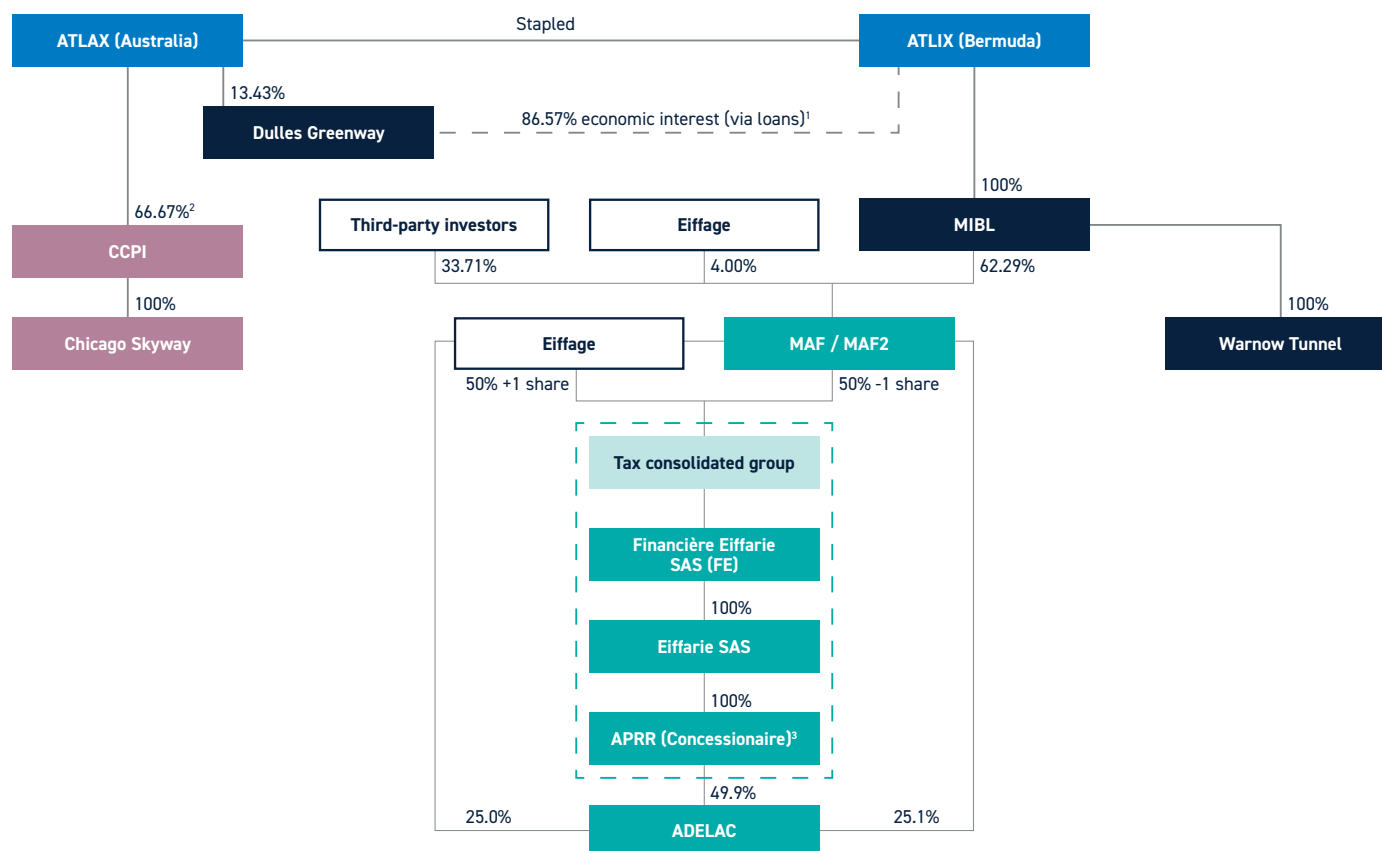
Our structure

Atlas Arteria summary of corporate structure as at 31 December 2022

Atlas Arteria's corporate operations are located in Australia, the United States and Luxembourg. The Board of ATLAX sits in Australia. The Board of ATLIX sits in Bermuda. Atlas Arteria has two controlled businesses, Dulles Greenway (owning a 100% economic interest) and Warnow Tunnel (owning 100% economic and equity interest). Atlas Arteria's corporate operations provide support for and oversight of the financial and operating policies and decisions of its controlled businesses, as well as supporting the governance and other requirements of the listed, stapled structure in Australia.

In December 2022, Atlas Arteria purchased a majority 66.67% interest in Calumet Concession Partners Inc., the ultimate holding company of the concessionaire of the Chicago Skyway toll road, located in Illinois, the United States of America (the **Chicago Skyway**). Ontario Teachers' Pension Plan (**OTPP**) owns the other 33.33% of the Skyway. Atlas Arteria holds an interest in the APRR Group (which owns and controls three separate concessions: APRR, A79 and AREA) and ADELAC which together provide the majority of Atlas Arteria's revenue. A controlling interest in those roads (approximately 52%) is owned by Eiffage S.A. (**Eiffage**), a French group listed on the Euronext (Paris).

We maintain a close working relationship with the management of each of our partners, OTPP and Eiffage, as well as that of the Skyway and APRR. We also appoint Board representatives to the various operating and joint venture entities of these businesses. Through these positions and relationships, Atlas Arteria promotes and supports the implementation of good governance practices across all of the businesses in which it invests.



1. ATLIX's 86.57% economic interest in Dulles Greenway represents two subordinated loans secured against the non-Atlas Arteria limited partner interests in Toll Road Investors Partnership II ('TRIP II').

2. ATLIX group holds US\$166.7m of shareholder loans in CCPI.

3. APRR owns 99.84% of AREA and 99.9% of A79. A79 was included in the tax consolidated group on 1 January 2023.

Our operations

Today, the Atlas Arteria Group consists of five toll road businesses in France, Germany and the United States.

ATLAS ARTERIA CORPORATE

Ownership 100%

Employees: **52** (23 women, 29 men)

[Atlas Arteria website](#)



APRR GROUP

Ownership: 31.14%

2,404km motorway network
in Eastern France

2035 concession expiry

Employees: **3,520**
(1,276 women, 2,244 men)

[APRR website](#)



ADELAC

Ownership: 31.17%

20km commuter road connecting
Annecy to Geneva

2060 concession expiry

[ADELAC website](#)



WARNOW TUNNEL

Ownership: 100%

2.1km road and tunnel in
Rostock, Germany

Employees: **37** (22 women, 15 men)

[Warnow Tunnel website](#)



CHICAGO SKYWAY

Ownership: 66.67%

12.5km toll road connecting
Chicago and Northwest Indiana

2104 concession expiry

Employees: **59** (35 women, 24 men)

[Chicago Skyway website](#)



DULLES GREENWAY

Ownership: 86.57%

22km commuter route into the
greater Washington DC area

2056 concession expiry

Employees: **15** (5 women, 10 men)

[Dulles Greenway website](#)



1. APRR concession expires in November 2035, AREA concession expires in September 2036, A79 concession expires in February 2068.

2. 100% economic ownership.

ATLAS ARTERIA'S SUPPLY CHAINS

Overview

Our supply chains are short, consisting largely of goods and services acquired within reasonable proximity to our operations, or the locations of our corporate offices. Most purchases by Atlas Arteria in 2022 were services provided by large multinational professional advisory firms.

Atlas Arteria is fortunately positioned to maintain a relatively stable pool of trusted suppliers, with whom we have well established, long-term relationships. While our size (and the size of our spend) limits the influence we have to impact the supply and labour arrangements of many of our suppliers, our strong relationships enable us to engage with them about any potential modern slavery risks we identify.

To provide an accurate overview of our supplier relationships, the following sections distinguish between the type of supplier (by business activity) and their geographical location, mapping these attributes for our corporate offices and each of our controlled businesses. Where possible, we have used consistent categories across these three supply chains.

Corporate level

In 2022, we assessed the risk of modern slavery practices occurring in our corporate supply chains as low. No reports of modern slavery or violations of human rights were identified through our supplier due diligence processes, nor were there any reports of such matters through our whistleblower (internal and external) channels. Further details about our risk assessment are outlined on pages 18 to 21.

We engaged over 140 suppliers on which we spent in excess of \$10,000 each.

Approximately 99% of the total corporate level spend was on suppliers operating in the same countries in which our corporate operations are located (being Australia, United States, Germany and Luxembourg). These countries have robust employment laws, established judicial systems and laws which protect basic worker rights. Less than 1% of the total corporate supplier spend was on suppliers in Bermuda. These Bermudian suppliers provide legal, consultancy and secretarial services to our corporate operations and support the functioning of the ATLIX Board. At the outset, this provides us with a level of confidence around the likely lower-risk profile of these supply chains.

We appreciate that geographical location is not conclusive and the [2022 Walk Free Global Slavery Index \(Slavery Index\)](#) estimates a number of people living in modern slavery in each of these countries. We use the Slavery Index to guide our risk assessment of modern slavery in our supply chain. Notably, the Slavery Index indicates that Australia (7/100), France (13/100), Germany (11/100) and the United States (25/100) rank as having low vulnerability of modern slavery occurrences. We also looked at the prevalence score provided by the Slavery Index, which estimates the proportion of the population living in modern slavery per one thousand people. Again, these scores were toward the low end of the risk spectrum with Australia (1.6), France (2.1), Germany (0.6) and the United States (3.3), recording low prevalence rates.

We are committed to assessing our suppliers beyond these statistics. As such, all suppliers across our corporate operations with whom we spend more than AU\$10,000 (as well as those at Warnow Tunnel and Dulles Greenway) go through our supplier due diligence process (outlined on pages 24 to 25 of this Statement). This includes reputational risk screening and monitoring.

More than 80% of our supplier spend is on professional services from the financial services, legal and insurance sectors, along with various consultants who advise on matters of ESG, strategy and human resources. These suppliers are either large multinational corporates or boutique firms providing specialised services, many of which have policies in place to protect the labour rights and conditions of their workers and/or publish modern slavery statements (which also identify how they manage their own supply chain risks).

In 2022, we continued our efforts to enhance our visibility and understanding of the human rights practices within our second-tier supplier network. Recognising the importance of responsible sourcing and ethical practices throughout our supply chain, we worked to expand our knowledge and insights.

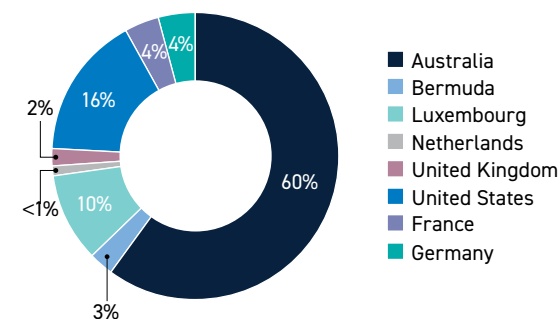
We collected data on our Tier 2 suppliers (and where possible, beyond that) through a meticulous desktop audit of all suppliers with whom we spend over \$10,000. Additionally, we sought external information from diverse sources, to complement the public data collected. Leveraging industry networks, databases, and online research, we gained a comprehensive view of all publicly available information on our extended supply chain.

Through this process, we aimed to identify potential human rights risks and areas of concern within our Tier 2 suppliers (and where possible, beyond that). This proactive approach should enable us to take prompt action, when required, to implement measures to address any identified issues.

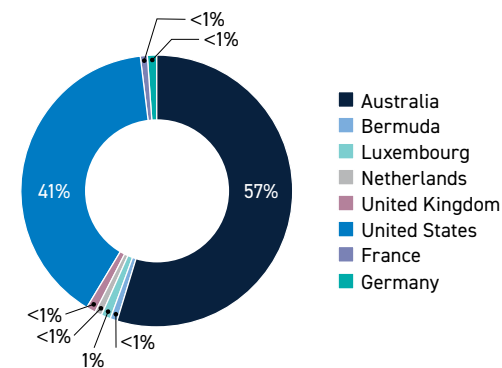
We will continue to work to further our knowledge of the sourcing and labour practices of our Tier 2 suppliers. Further information on our analyses is provided in the next section.

Direct Tier 1 Suppliers

Percentage of total Corporate supplier numbers by geographical location



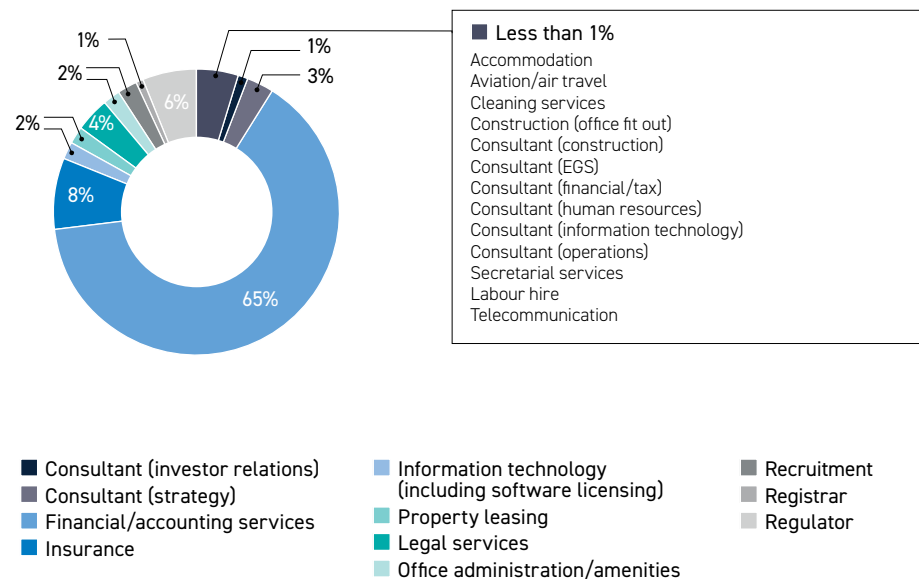
Percentage of total Corporate supplier spend by geographical location



Corporate level

Direct Tier 1 Suppliers

Percentage of total Corporate supplier spend by supplier category



Tier 2 Suppliers

In 2022, we continued our efforts to enhance our visibility and understanding of the human rights practices within our second-tier supplier network. After excluding individual consultants and governmental organisations, we focused our analysis on 47 Tier 1 Suppliers with a spend over \$10,000 with sufficient public disclosures to support our investigation.

We analysed those suppliers' public disclosures (such as their modern slavery reports, sustainability reports and other non-financial information disclosures) to gain insights into their own supply chains, including details about their own suppliers, sourcing locations and manufacturing processes.

Information in relation to modern slavery and/or human rights practices was available for over 72% of these suppliers (through modern slavery statements under the Australian and/or UK Modern Slavery Act, sustainability reports or other non-financial disclosures obligations).

We furthered our analyses by leveraging valuable data and insights into common suppliers or industry-specific practices, supply chain information through the review and analysis of research papers, reports and publications of numerous industry associations, NGOs, watchdogs organisations and official government sources.

Through this process, we aimed to identify potential human rights risks and areas of concern within our second-tier suppliers. While we gained a better understanding of the structure of our supply chain, we also acknowledge the limits of our analysis confined as it was to suppliers which publish information about their own supply chains.

We will continue our efforts to further our knowledge of the sourcing and labour practices of our second-tier suppliers, including by communicating directly with suppliers we assess to have an elevated supply chain risk and which don't themselves publish supply chain information.

Dulles Greenway

In 2022, the Dulles Greenway engaged 64 suppliers who each attracted a spend in excess of US\$10,000. The majority of these were ongoing supplier relationships, which have been included in our previous modern slavery statements.

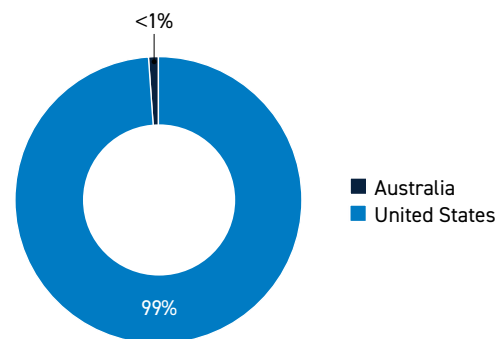
Overall, we consider the supplier network for Dulles Greenway to be at low risk for modern slavery. This assessment follows a robust assessment of its supplier network through our due diligence practices and processes, outlined on pages 24 to 25.

Dulles Greenway's entire spend is on suppliers located in either the United States or Australia, with more than 99% of its Tier 1 suppliers located in the United States, a country which ranks comparatively low for the key metrics released by the Slavery Index (outlined on page 11 above). The Slavery Index states that this reflects the United States' implementation of new measures to eliminate modern slavery from supply chains, for example legislating the Uyghur Forced Labour Prevention Act in 2021. However, these improvements are counterbalanced with gaps in modern slavery prevention, such as the absence in the United States of legislation criminalising forced marriage. Notably, the Slavery Index identifies forced labour in the United States being most prevalent (based on report numbers) in domestic work, agriculture/farming, construction and the retail/hospitality sectors.

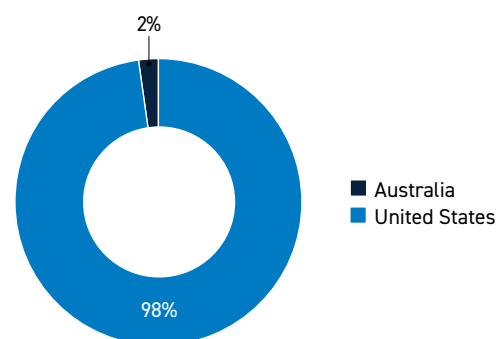
Over 50% of the Dulles Greenway's supplier spend is on professional advisers in the financial and legal sectors. Construction/maintenance suppliers (which are traditionally considered higher risk from a modern slavery perspective in the United States as noted above) only account for approximately 16% of Dulles Greenway's supplier spend. This supplier category was a focus area in 2021, and will return to focus in 2023 and 2024, as we look to further build our understanding of these suppliers, their employment practices and supplier networks.

Direct Tier 1 Suppliers

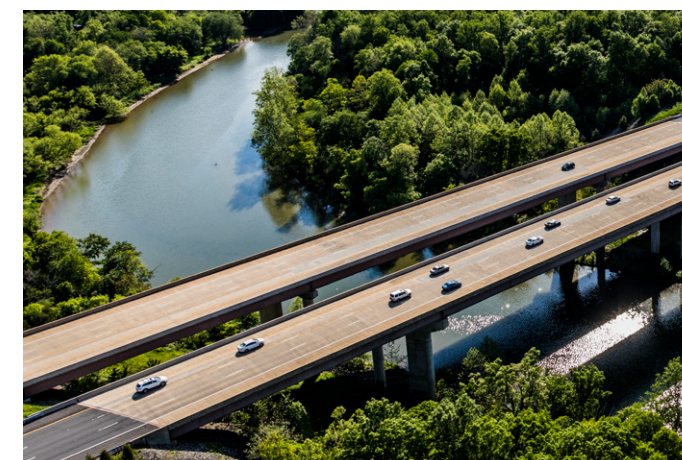
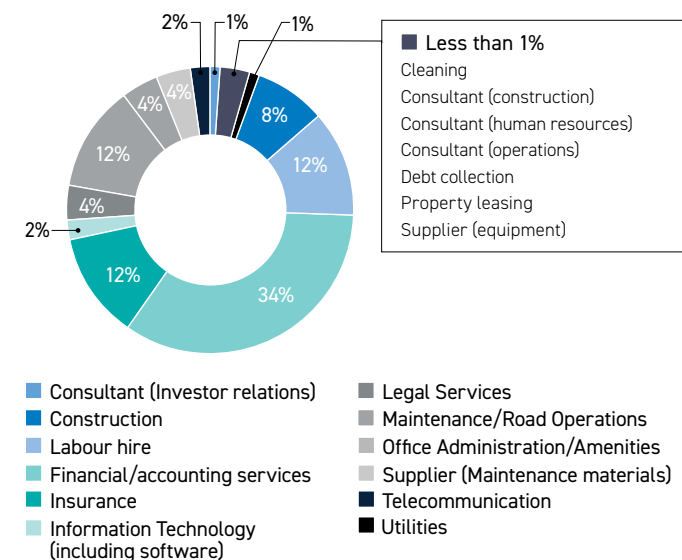
Percentage of total Dulles Greenway supplier spend by geographical location



Percentage of total Dulles Greenway supplier numbers by geographical location



Percentage of total Dulles Greenway supplier spend by supplier category



Warnow Tunnel

In 2022, the Warnow Tunnel engaged 41 suppliers who each attracted a spend in excess of €10,000.

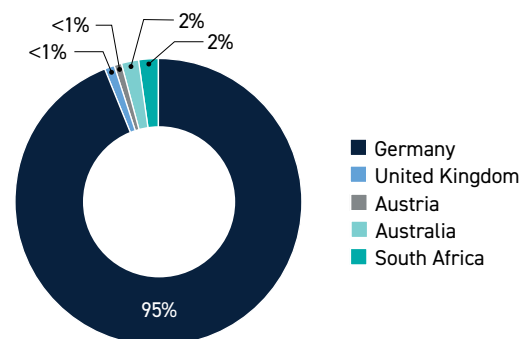
Overall, we consider our supplier network for Warnow Tunnel a low risk for modern slavery, following a robust assessment of its supplier network through our due diligence practices and processes outlined on pages 24 to 25.

The majority of Warnow Tunnel's suppliers are located in Germany, accounting for approximately 95% of their total supplier spend. Warnow Tunnel's other suppliers are based in Austria, Australia, the United Kingdom and South Africa. We consider Germany, Austria, Australia and the United Kingdom to be low risk based on the robust employment laws, established judicial systems and basic worker rights legislation and protections. Further, the Slavery Index identifies Germany among the lowest risk countries in the EU. The United Kingdom is recorded as one of the strongest in governing modern slavery, with a prevalence rate of 1.8 and a vulnerability score of 14/100 according to the Slavery Index, while Austria has a prevalence score of 1.9 and a vulnerability score of 8 out of 100. Warnow Tunnel has one (1) supplier originating from South Africa. Whilst South Africa has a higher prevalence score and vulnerability rating, we have assessed this supplier using our supplier due diligence process. No risks were identified.

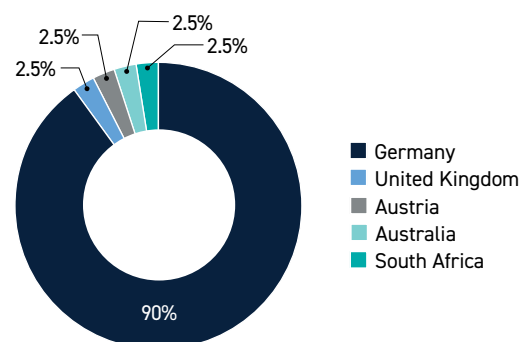
Most of Warnow Tunnel's supplier spend is linked with servicing the electronic and digital aspects of its tolling operations (26%). Road maintenance, (including maintenance equipment and materials) is the next largest supplier spend category (approximately 30%). The other large component of Warnow Tunnel's supplier spend is on professional services in the legal, financial and insurance sectors (approximately 20%).

Direct Tier 1 Suppliers

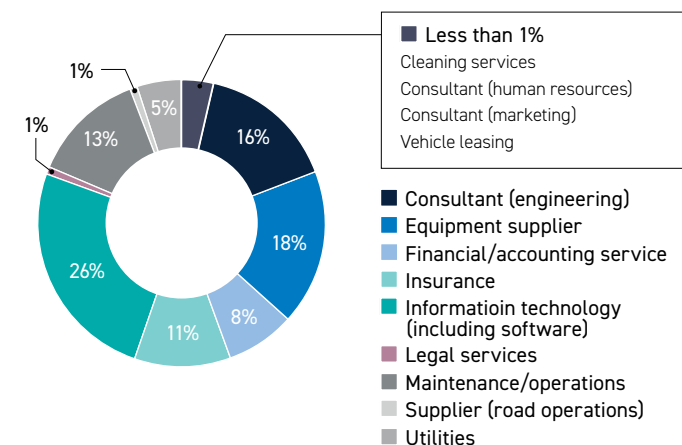
Percentage of total Warnow Tunnel supplier spend by geographical location



Percentage of total Warnow Tunnel supplier numbers by geographical location



Percentage of total Warnow Tunnel supplier spend by supplier category



Joint Ventures



APRR¹

APRR (together with its subsidiaries AREA and ADELAC) is France's second-largest toll road network and Europe's fourth-largest motorway group, employing over 3,000 people. APRR builds, maintains and operates its motorway network under concession contracts with the French State.

The Eiffage group of companies (**Eiffage**) is France's third-largest construction and concessions group and holds an equity interest of approximately 52% in APRR. As such, APRR is subject to Eiffage's duties, policies and procedures relating to human rights and the fight against modern slavery and human trafficking.

Eiffage's approach includes reference to the Universal Declaration of Human Rights, the 2017 French Duty of Vigilance Law, the UK Modern Slavery Act 2015, the European Taxonomy proposals, the UN Global Compact, the International Labour Organisation (ILO) core conventions and the UN Guiding Principles.

Eiffage is committed to respecting human rights and freedoms. Eiffage's values apply to all of its operations including APRR. All countries in which the group operates have ratified the core conventions of the International Labour Organisation (ILO) and Eiffage has confirmed its commitment to complying with them, including those in relation to:

- prohibition of forced labour (c29-c105);
- prohibition of child labour (c138-c182);
- discrimination (c100-c111); and
- freedom of association (c87-c98).

Moreover, by adhering to the Global Compact (or Global Pact) from 2005, Eiffage made a commitment to integrate, distribute and advance its main principles. The Global Compact invites companies to adopt, support and apply in their sphere of influence, a set of core values in the areas of human rights, labour standards and the environment and the fight against corruption. Each year Eiffage renews its commitment to the Secretary General of the United Nations through its 'Progress Communication', detailing the actions intended to achieve the objectives it has set, in line with the principles of the Global Compact.

Since 2021, Eiffage has strengthened its commitment by moving from GC Active status to the higher level, GC Advanced under the global pact. This level demonstrates greater transparency in the presentation of the actions carried out by Eiffage.

Under the French Duty of Vigilance Law 2017, Eiffage is required to effectively prevent human rights violations and environmental risks, both within the company itself, and also in its controlled subsidiaries, subcontractors and suppliers, through the establishment, implementation and publication of an annual Duty of Care Plan ('*plan de vigilance*'). Eiffage's Duty of Care Plan, developed collaboratively between the relevant departments and divisions of the group (including APRR), is integrated with its Annual Report, published in March each year.

Eiffage (including APRR) observes the six key stages of due diligence in terms of human rights, presented in the UN Guiding Principles. The due diligence process, in terms of respect for human rights, is detailed in Eiffage's Duty of Care Plan and is reinforced in particular through the following actions.

- CSR risk mapping, updated annually, to identify and assess the negative impacts of Eiffage on human rights and fundamental freedoms. As part of this exercise, Eiffage assessed these risks as low ('net risk') and therefore they do not appear as a 'major risk' in the group map (see below for a description of the identified risks).
- Adoption in 2022 of a specific declaration of Eiffage's commitment to the fight against modern slavery and human trafficking.
- The adoption of a professional whistleblowing system, allowing the reporting of serious violations of human rights, fundamental freedoms, environment, health and safety. In 2023, this will be open to external stakeholders, with a procedure for internal investigations, including the formalisation of follow-up of remedial actions.

The risks Eiffage identified in relation to human rights and fundamental freedoms, together with a plan for addressing and mitigating them, are provided in their Duty of Care Plan, as follows:

Diversity and equal opportunity

- Non-achievement of Eiffage's commitments in the promotion of diversity and equal opportunity.
- Non-compliance with legal obligations (e.g., INDEX, Rixain Law aiming at greater equality between women and men in companies) and the expectations of the stakeholders (shareholders, rating agencies, employees) in terms of equality men/women, representation in the bodies of governance, positions held by people with mobility reduced or disabled workers.
- Limited turnover of teams and difficulty in attracting staff necessary to achieve the objectives.
- Degradation of Eiffage's image and reputation.
- Lack of attractiveness to the populations concerned (women, youth, LGBTIQA+ community).

Degradation of social relations

- Replacement of constructive, genuine dialogue with purely superficial and box ticking consultation.
- Violation of the freedom of association, the right to negotiation, collective action and obstruction of the right to strike.
- Impossibility for workers to organise themselves to be represented.
- Degradation of social relations due to inflation and pension reform.

Personal data breach (customers or employees)

- Loss, theft, unavailability and fraudulent use of personal data (collaborators or customers).
- Failure to comply with the GDPR resulting in financial penalties and an impact on reputation.

Eiffage has not been the subject of any condemnation for non-compliance with human rights. No referral was accepted by a National Contact Point (NCP) of the OECD, and no allegation has been adopted with regard to it and published on the website of the Centre de Business and Human Rights Resources (BHRR).

1. Please refer to the following documents for further information: (i) [Eiffage's UN Global Compact Communication on Progress](#); (ii) [Eiffage's FY22 Annual Report](#); and (iii) [Eiffage's Modern Slavery and Human Trafficking Statement](#).

Joint Ventures



Chicago Skyway

The Chicago Skyway is a 7.8 mile long toll road that connects the Indiana Toll Road to the Dan Ryan Expressway on Chicago's South Side. It has been operating for more than 60 years. It is situated in one of the densest urban areas of Chicago and is a key infrastructure hub in the Midwest, delivering a diverse range of commuter, leisure and commercial traffic. The road was initially opened to traffic in 1958 and, following privatisation by the City of Chicago in 2005, is now operated under a 99-year concession lease, with 81 years remaining.

In December 2022, Atlas Arteria completed its acquisition of a 66.67% majority interest in the Chicago Skyway. In the lead up to the acquisition, a comprehensive due diligence process was undertaken into Chicago Skyway's operations and business. As part of this due diligence, Atlas Arteria's management undertook, among other things, an assessment of Chicago Skyway's employment and labour practices and completed reputational screening of key counterparties to the transaction and companies within the target group. This assessment identified that the Chicago Skyway has robust corporate policies in place (including a Code of Conduct and employee handbooks) along with legally compliant employment hiring practices. Our reputational screening did not identify any modern slavery indicators.

Initial work has commenced on assessing Chicago Skyway's supply chain, which has around 88 suppliers. Each supplier is presently being screened through our third-party due diligence tool. Should any material concerns arise through this process, further supplier due diligence will be undertaken (in consultation with Chicago Skyway's management) in accordance with the process outlined on pages 24 to 25 of this Statement. Results of our third-party due diligence will be reported in Atlas Arteria's next Modern Slavery Statement.



MODERN SLAVERY RISKS IN ATLAS ARTERIA'S OPERATIONS AND SUPPLY CHAINS



Risks of modern slavery in our operations and supply chains

We recognise the potential for modern slavery risks within our operations and supply chains. We remain committed to understanding and managing these potential risks in partnership with our people and our suppliers.

We understand that employee hiring practices, including the use of labour hire providers, could contribute to our modern slavery risk (particularly should any non-compliance with applicable laws and labour standards exist).

We have previously assessed the risk of modern slavery practices within our organisation. Overall, the risk of modern slavery in our operations is low. Our assessment involved collaboration with relevant staff across the business. It included a review of employee profiles, hiring practices, and workplace policies and procedures. No issues indicating modern slavery risks were then identified and there have been no material changes in our hiring and workplace practices since this assessment. We continue to monitor legislative changes to ensure our workplace policies and practices are up to date. Recently, we updated our STEER principles, following extensive consultation with our corporate staff. The insights received were used to review our STEER principles ensuring they accurately reflect our employees' input.

This determination is supported by several factors. Firstly, all employees at our corporate headquarters, Warnow, and Dulles Greenway are employed in accordance with all applicable laws, employment contracts/terms. Additionally, our corporate offices are situated in countries with robust labour laws, to which we strongly adhere.

Further, we engaged directly with human resources personnel to gain insights into our employee hiring practices, revealing no indications of modern slavery risks. We uphold our values through comprehensive training programs (delivered as part of induction for all employees and consultants and then refreshed biannually) and consistently applied policies that ensure our workers are aware of their rights and know how to report any misconduct. Our grievance and whistleblower reporting channels received no reports concerning any issues indicative of human rights violations, including modern slavery, in the reporting period.

We continuously review and improve our practices to mitigate modern slavery risks and uphold ethical standards across our operations.



Risks of modern slavery in our operations and supply chains

We have assessed the risk of modern slavery in our operations and supply chains as low. No reports of modern slavery or human rights related violations were identified through our due diligence processes. Further, no reports of modern slavery practices or violations of human rights were made to Atlas Arteria's Whistleblower Protection Officers or via the external 'Speak Up' whistleblower hotline (which is made available to our staff and suppliers).

While modern slavery constitutes the most severe and egregious form of human rights violation, at the extreme end of the exploitation spectrum, we recognise that modern slavery practices may still arise even in circumstances where extreme human rights violations are not identified. For example, a combination and an accumulation of certain actions may, over time, culminate in a people working in oppressive or unsafe working environments. When assessing the risk of modern slavery practices in our supply chains, we look for and consider the risk of a full range of potential violations, from forced labour to less severe but still significant violations which may indicate or be precursors to modern slavery, such as discrimination, roles where vulnerable workers may be more likely (such as low skilled or transitory work) and unsafe working conditions (such as a failure to meet basic organisational health and safety standards).

Our work since 2020 has afforded us a strong understanding of the potential modern slavery risks that may exist in our operations, businesses and supply chains.

In 2022, we built on that foundational work by maturing our understanding of our potential modern slavery risks and their relationship with the risk of lesser infringements on human rights. This work will continue in 2023 and beyond, as we seek to ensure that Atlas Arteria does not cause, contribute to, or be directly linked to modern slavery practices through our supply chains.

Atlas Arteria adopts a holistic approach to human rights due diligence. The objective is to consider all potential risks, as well as the impacts (both positive and potentially negative) of our operations and business practices on our workers and other stakeholders.

Our modern slavery risk assessment and due diligence consists of identifying where the risks lie, both in our operations and in our supply chain. We determine the level of risk, and assess our potential level of involvement regarding such risks in line with the UNGPs guidelines.

The UNGPs set out an authoritative framework to help businesses determine their level of involvement in (and expected response to) an actual or potential human rights infringement. It is based, on a continuum of involvement:





Causing modern slavery — a company may directly cause modern slavery by employing workers in conditions of forced labour or debt bondage;

Contributing to modern slavery — a company may contribute to modern slavery by creating or maintaining a supply chain that is at high risk of labour exploitation; and

Directly linked to modern slavery — a company may be linked to modern slavery through its investments or business relationships.

How we apply this framework is set out on page 20.

We assess the potential risks of modern slavery practices in our supply chains by considering four factors:

 Industry risks	 Supply risks	 Entity risks	 Geographic risks
<ul style="list-style-type: none"> - Higher risks are associated with low-skilled labour and a reliance on outsourcing - Reported occurrences of modern slavery or unlawful labour practices - Reliance on offshore labour agencies 	<ul style="list-style-type: none"> - Higher risks are associated with certain products, such as rubber and construction materials - Systemic, excessive discounted pricing or shortened delivery times - Known or reported association of labour exploitation with production/supply of goods/services 	<ul style="list-style-type: none"> - Some suppliers may have a record of poor practices or human rights violations - Poor or inadequate policies or processes - Poor reporting mechanisms or opaque and complex supply chains 	<ul style="list-style-type: none"> - Higher risks in countries with poor rule of law and human rights records, or otherwise inadequate employment laws, or no mandated minimum requirements for working conditions

Risks of modern slavery in our operations and supply chains

On this basis, considering the profile of our operations and supply chains, we have identified the following areas presenting a potential higher risk of modern slavery:

High risk areas	Potential risk	Potential level of involvement	Form of modern slavery risks	Risk assessment
Offshore activities by our corporate financial service providers Industry/geography	We use financial and professional services providers who allocate part of their back office activities to locations in countries with lower labour standards and low wages. Number of suppliers identified in this potential risk area: 6	While the risk of modern slavery is quite low considering the profile of the workforce concerned (skilled, educated), there is a potential risk of being directly linked to other less severe human rights violations.	Forced labour, debt bondage, deceptive recruitment for labour services.	No material risks identified through our supplier due diligence processes. Each of these suppliers in this category report in accordance with the Australian and/or the UK modern slavery laws. In 2022, Atlas Arteria's management conducted further desktop due diligence, issued questions and consulted with some of these suppliers. Our overall assessment was that these suppliers have strong governance practices around employee/labour hiring, workplace standards and conditions and remuneration. In 2022, we commenced investigating some of these suppliers' suppliers (i.e. our Tier 2 suppliers). The results of this analysis are outlined in the table on page 12.
Labour hire Industry	We use labour hire agencies largely to supply toll booth operational staff at the Dulles Greenway. While not currently the case, we may, from time to time, use labour hire agencies in other parts of our operations. Number of suppliers identified in this potential risk area: 3	Potential risk of contributing to or being directly linked to modern slavery where workers may come from vulnerable populations, including migrant workers.	Forced labour, debt bondage, deceptive recruitment for labour services.	Atlas Arteria's management has consulted with and disseminated questions to its labour hire provider at the Dulles Greenway. Detailed responses were provided. In addition, sit-down talks were had with a representative of the provider and one contractor engaged from the labour hire provider. No evidence of modern slavery practices were identified during this process and management continue to monitor this provider. Our Corporate operations have two labour hire providers to fill a professional accounting and professional support role. Each of these providers underwent our supplier due diligence process (with no risks identified) and a requirement to comply with our Supplier Code of Conduct was included in the contracts with these providers. Additionally, one of these providers is required to, and does, publish a Modern Slavery Statement in accordance with the Modern Slavery Act. The personnel we hired under these arrangements went through our induction program, including in relation to our workplace health and safety policy and procedures.
Facilities and cleaning services Industry	We use external third-party cleaning services for the corporate offices and controlled businesses. Number of suppliers identified in this potential risk area: 4	Potential risk of contributing to or being directly linked to modern slavery, where workers in these industries may come from vulnerable populations, including migrant workers.	Forced labour, debt bondage.	No material risks identified through our supplier due diligence processes. Across 2021 and 2022, Atlas Arteria's management investigated and consulted with its cleaning providers. Where necessary, follow-up meetings were held to understand responses to questions and labour hiring practices. No evidence of modern slavery practices was identified.
Construction/maintenance Industry/supply	We use third parties for the construction and/or maintenance of our roads, service centres/facilities and associated tolling equipment and hardware. Risk is increased depending on the nature of materials/supplies (e.g., bricks, concrete, solar panels). Number of suppliers identified in this potential risk area: 16	Potential risk of contributing or being directly linked to modern slavery should we inadvertently use suppliers who violate labour laws or themselves have suppliers (i.e., Tier 2 suppliers to us) that violate human rights/labour laws.	Forced labour, debt bondage, child labour.	No material risks identified through our supplier due diligence processes. Across 2021 and 2022, Atlas Arteria's management, where necessary, issued questionnaires to suppliers in this cohort. Responses to all questionnaires were received and no further action was required. We continue to monitor the suppliers in this group, in particular given the findings in the Slavery Index around the construction sector in the United States and will look to commence another round of engagement across 2023 and 2024.

Risks of modern slavery in our operations and supply chains

High risk areas	Potential risk	Potential level of involvement	Form of modern slavery risks	Risk assessment
IT hardware, software and peripherals Industry/supply	<p>We use various technology hardware as part of our day-to-day work, including laptops, monitors, headsets, keyboards and other IT peripherals across all our operations.</p> <p>Warnow Tunnel and Dulles Greenway use electronic road signage and tolling technology.</p> <p>Number of suppliers identified in this potential risk area: approximately 36</p>	<p>Potential risk of being directly linked to modern slavery when we use suppliers that rely on offshore and/or complex supply chains over which we have limited visibility.</p> <p>This risk is heightened when goods are made by base-skilled workers on a demand basis.</p>	<p>Forced labour, child labour, deceptive recruitment for labour services.</p>	<p>Our technology hardware devices (laptops, monitors, phones, videoconference systems) are from reputable brands ranking at the top tier of the 2022 Corporate Human Rights Benchmark by the World Benchmarking Alliance and the 2022 Information and Communications Technology Benchmark Finding Report by Know The Chain.</p> <p>No material risks identified through our supplier due diligence processes. The majority of our suppliers in this group are SaaS providers. The software licensed from these suppliers is on a 'take it or leave it' basis, and the nature of our contractual relationship (and spend on most of the suppliers in this group) is insufficient to leverage influence.</p>
Hotels and accommodations Industry	<p>We use various hotels for business-related travel, in Australia, Europe and the US.</p> <p>Number of suppliers identified in this potential risk area: approximately 15</p>	<p>Potential risk of being directly linked to modern slavery when we use suppliers who violate labour rights or themselves have suppliers violating human rights/labour rights.</p>	<p>Forced labour, deceptive recruitment for labour services, human trafficking.</p>	<p>In 2023, suppliers in this area will be a focus for consultation and our supplier due diligence processes.</p>

Case study



SOLAR PANELS – supply chain risks

The production of solar panels relies on polysilicon, a crucial component derived from quartz sand. China dominates the polysilicon market, and approximately 45% of the global supply in 2021 originated from the Uyghur region. The solar industry has been marred by widespread forced labour, particularly in the Uyghur region. Numerous reports have alleged state-imposed forced labour, primarily targeting Uyghurs and other Turkic and Muslim communities.

In 2022, as part of its low-carbon strategy, Warnow Tunnel initiated a study on the potential benefits associated with the deployment of photovoltaic panels on the toll plaza.

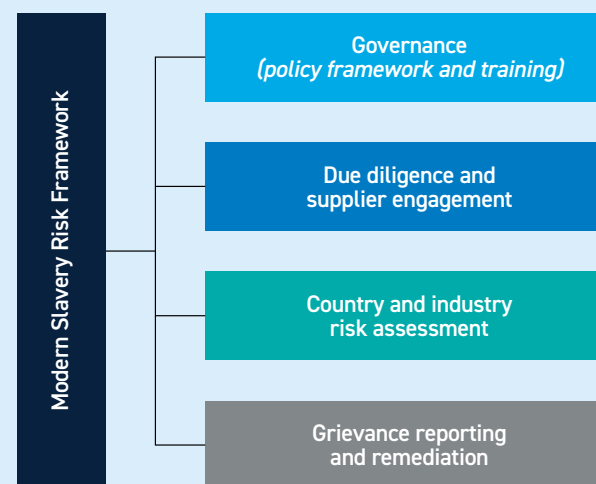
Considering the high risks posed by the photovoltaic panel supply chains, potential suppliers will be subjected to a specific heightened due diligence standards in order to ensure that our standards are met in terms of respect of human rights, health and safety and the environment.

MODERN SLAVERY GOVERNANCE, PROCESSES AND REMEDICATION

In 2020, we introduced a Modern Slavery Risk Framework to address the potential existence of modern slavery risks within our operations and across our supply chain. We will continue to enhance this framework by refining procedures and practices such as supplier due diligence, expanding our capabilities by developing new employee guidelines for assessing modern slavery risks, and adopting of new technologies to manage suppliers and perform risk assessment.

While we acknowledge that it is impossible to guarantee the absence of modern slavery in our operations and supply chains, we are confident that our approach mitigates this risk. Our policies — coupled with our training program, due diligence processes, supplier engagement practices, and country and industry risk assessments — provide a solid foundation to identify, prevent, and mitigate modern slavery risks.

We understand that reporting issues can be challenging for workers who may not feel comfortable, or fully understand the reporting process. Nevertheless, we remain committed to fostering a culture of transparency and continuous improvement. We strive to strengthen our ability to combat modern slavery, promote responsible practices, and safeguard the rights and wellbeing of workers across our operations and supply chains.



Governance

Our Governance framework, outlined in our annual Corporate Governance Statement, provides comprehensive information on the structures and processes that govern our business. It covers our approach to risk management, including key areas such as human rights and modern slavery. The Atlas Arteria Audit and Risk Committees oversee our risk management framework, while ultimate responsibility lies with the Boards.

Our Vision and Values and Code of Conduct serve as guiding principles for the personal and professional behaviour we expect from our employees and business partners. We actively encourage employees and suppliers to report any actual or suspected instances of modern slavery through both internal reporting mechanisms and formal external whistleblowing channels.

Atlas Arteria's controlled entities operate under their own management with their own executive teams, policies and management procedures to comply with local workplace health and safety laws. They also ensure equal employment opportunities and a secure working environment. These policies and procedures align with Atlas Arteria's Code of Conduct and other guidelines. These companies have established protocols and practices for employees to express concerns regarding working conditions, the environment, employment, or legal rights. Additionally, they have taken measures to inform their workforce about the option to report instances of misconduct related to Atlas Arteria and its subsidiaries, following Atlas Arteria's Whistleblower Policy.

To ensure awareness and understanding of our corporate policies, we train our corporate employees on our policies when they join and we refresh this training every two years. We also work closely with management at Dulles Greenway and Warnow Tunnel to align their policies and procedures with Atlas Arteria's standards. Staff at these locations have access to relevant corporate policies in their respective languages and receive periodic training on them. They also have access to, and are trained on, our whistleblower policies and reporting hotline 'Speak Up'.

We have tailored our Supplier Code of Conduct to address local circumstances and requirements. For Warnow Tunnel suppliers, we have communicated a German-language version of the Supplier Code of Conduct. We strive to include compliance with our Supplier Code of Conduct as a requirement in new and renewed supply contracts. Any material breach of this Code may result in a range of consequences, including the termination of our engagement with that supplier. The Supplier Code of Conduct is accessible on the websites of Atlas Arteria, Dulles Greenway, and Warnow Tunnel and links to it are included in our contracts with suppliers.

Our Vision
and Values
Statement



Code of
Conduct



Workplace
Health and
Safety Policy



Anti-bribery
and Corruption
Policy



Environmental
and Social
Responsibility
Policy



Privacy Policy
and Data
Protection



Supplier Code
of Conduct



Diversity
and Inclusion
Policy



Whistleblower
Policy



Governance

Supplier due diligence and engagement

Our due diligence and supplier engagement process follows the 'Know Your Suppliers' framework based on the UNGPs guidelines: Atlas Arteria's controlled subsidiaries operate under the guidance and management of their respective local executive teams. They have implemented measures to evaluate the risks associated with human rights violations, such as modern slavery, in their operations and supply chains. Although practices may differ between businesses, our aim is to achieve standardisation of practices and processes throughout our operations.

1. Identify

The first step is to identify potential risks associated with the supplier. This includes assessing the supplier's geographic location, business practices, and reputation.

2. Assess

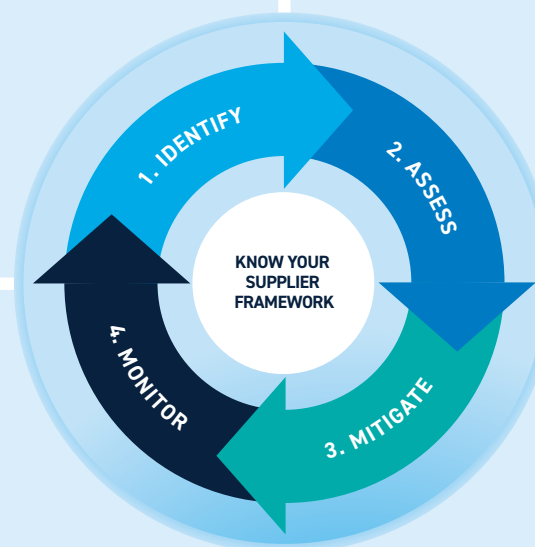
Once potential risks have been identified, the next step is to assess the supplier's level of compliance with relevant laws, regulations and industry standards. This includes assessing the supplier's human rights record and any potential risks to workers, communities, or the environment. This may include conducting a desktop audit of the supplier and its stance on modern slavery and other factors relevant to human rights risks, asking suppliers to respond to further questions in relation to their operations.

3. Mitigate

After assessing the supplier's risk profile, we determine whether any additional measures need to be taken to better understand the relevant risk and, where that risk is not remote, to mitigate such risk. This may include setting standards for suppliers, requiring them to adopt specific policies and procedures, or engaging in ongoing dialogue with suppliers to address any concerns.

4. Monitor

Finally, we monitor the supplier's situation on an ongoing basis to identify any emerging risks or incidents that may impact them.



Governance

Our due diligence and supplier engagement process generally involves a combination of the tasks outlined in the table below. Where we are not satisfied (after completing our due diligence and supplier engagement process) that a risk or risks can be explained or mitigated, we will either not engage with, or terminate our relationship with the supplier.

IDENTIFY	<p>Supplier screening – to ensure supplier alignment with our values, we conduct reputational screening via a third-party online monitoring platform. This tool provides access to comprehensive global news content, company information, and market intelligence. All suppliers across our corporate operations, Dulles Greenway and Warnow Tunnel who attract a spend of 10,000 in local currency are registered, screened and monitored in this system.</p> <p>– Profile score: we assess suppliers based on factors like industry, Corruption Perception Index, contract value, and country risk. The weighted profile score categorises risk as low, medium, or high.</p> <p>– Reputational screening score: our comprehensive screening scans suppliers' profiles using a vast risk intelligence database. It checks for real-time sanctions, politically exposed persons, and adverse media results. This includes specific risks like modern slavery and human rights. The outcome is a traffic light risk assessment of green, yellow, or red.</p>
ASSESS	<p>Desktop audit – where our third-party reputational screening tool identifies potential risks, we proceed with a review of the publicly available information to evaluate the compliance of the suppliers with our standards and requirements in relation to their social responsibility approach. Potential risks are identified by analysing the data available on the suppliers as well as external resources, such as government reports, NGO databases, and industry associations, to identify high-risk areas and suppliers where modern slavery may be more prevalent.</p> <p>Questionnaires – depending on the nature of the risk(s) identified, we may seek further information and assurance by issuing a bespoke questionnaire to be answered by the prospective supplier. This seeks specific information from suppliers designed to identify practices that could amount to or potentially lead to modern slavery. The questionnaire typically includes a request for an overview of the supplier's corporate policies, details of employment practices, etc.</p> <p>Site visits – where possible, and to the extent it seems relevant, we reserve the right to conduct an on-site visit to the supplier, to complement our desktop assessment.</p> <p>External resources – where relevant and available, we leverage external resources such as industry certifications, third-party audits, and reputable databases to gain insights into our supplier's track record and compliance with relevant standards. This provided us with an independent assessment of the supplier's performance and helps us verify the accuracy of the information gathered.</p>
MITIGATE	<p>Supplier Code of Conduct – we seek to negotiate the requirement to comply with our Supplier Code of Conduct into all new contracts and also when renewing contracts. A material breach of our Supplier Code of Conduct has the potential to result in the termination of our engagement with a supplier.</p> <p>Contractual clauses – if we identify a supplier with elevated modern slavery risk, and we still consider engagement appropriate, we manage that risk by including specific contractual clauses (including access to information and rights to audit) and conduct performance reviews.</p> <p>Training and capacity building – in certain circumstances we may consider providing training to suppliers to help them meet our expectations for ethical behaviour. This may include training on labour rights, environmental sustainability, and anti-corruption measures. Thus far, we have not done so.</p> <p>Engagement and dialogue – we strive to engage in ongoing dialogue with suppliers to foster a collaborative and constructive relationship. This can include regular meetings to discuss performance and address potential issues, as well as opportunities for feedback and input from suppliers.</p>
MONITOR	<p>Ongoing monitoring – we understand that the risks associated with human rights violations are dynamic and can be influenced by political, social, and environmental factors. These changes can significantly impact the risks we face. As a result, we do not treat due diligence as a one-off exercise, but maintain continuous monitoring of our suppliers through our third-party screening tool. It promptly alerts us to potential supplier risks in real-time.</p> <p>In addition, we conduct periodic 'check-ins' with selected suppliers when we believe that certain events, such as political or environmental developments, could adversely affect our initial risk assessment. These check-ins ensure that our suppliers continue to meet our requirements and expectations.</p> <p>By employing ongoing monitoring practices, we remain proactive in identifying and addressing potential risks within our supply chain, ensuring that our suppliers uphold the standards and commitments we have established.</p> <p>Supplier Due Diligence Committee: Each month a Supplier Due Diligence Committee meets to review supplier due diligence outcomes and periodically focus on certain suppliers to determine whether the supplier should go through the 'assess' steps of our due diligence process. This may occur, for example, if a supplier has been engaged for many years and is under no other monitoring/assessment (other than our continuous reputational monitoring through our third-party screening tool).</p>

Grievance mechanism and remediation system

Grievance processes and mechanisms

Our operations (Feedback and 'Speak Up' culture/whistleblower services)

Fostering transparency is fundamental to our values at Atlas Arteria. We encourage open and regular communication between staff and senior management. This is central to the early detection of potential instances of human rights abuse and/or indicators which may point to the potential for them. Our employees have various avenues to provide feedback, including informal discussions, formal feedback processes, and manager-team member meetings.

To ensure the identification, reporting, and appropriate management of any instance of modern slavery, Atlas Arteria relies on its 'Speak Up' culture and Whistleblower services. Our training programs and open communication channels between employees and management enable the identification and reporting of any violations. We provide a dedicated external whistleblowing service called 'Speak Up', operated by Deloitte, allowing anonymous reports via phone, post, email, or web portal. Deloitte reviews the information submitted and shares the report with our designated Whistleblower Protection Officers, who handle the review and investigation in accordance with our Whistleblower Policy.

Employees and suppliers also have the option to make anonymous and confidential reports directly to our dedicated Atlas Arteria Whistleblower Protection Officers. To maintain proper records, these officers log the reports with the Deloitte 'Speak Up' service. We aim to diligently triage, investigate, and respond as appropriate to all reports, following our Whistleblower Policy. The Atlas Arteria Audit and Risk Committees are to be promptly notified of all whistleblower reports, ensuring immediate attention to material reports. In 2022, we received no such reports.

Following our internal 'dummy test' of our whistleblower 'Speak Up' services (reported last year), in 2023, we are engaging external advisors to continue assessing the efficacy of our whistleblower systems. In consultation with them, we will develop hypothetical whistleblower scenarios, which will allow our Whistleblower Protection Officers and senior management to work through realistic reports. This exercise is designed to assess their knowledge of our internal Eligible Receipt processes and procedures and will help to identify any training program or process gaps for our Eligible Recipients.

Our supply chains

Our suppliers also have access to our whistleblowing hotline 'Speak Up'. Our Supplier Code of Conduct outlines multiple channels for our suppliers to report any misconduct or breaches. They have the option to report to their main commercial point of contact within our operations, or Atlas Arteria's General Counsel. Alternatively, they can submit a report to one of our Whistleblower Protection Officers or use our external whistleblower services anonymously and confidentially. The specific procedure for suppliers of Warnow Tunnel is detailed in the German Supplier Code of Conduct.



The English version of the whistleblower poster, which is displayed at our corporate offices and Dulles Greenway.



The German version of the whistleblower poster, which is displayed at Warnow Tunnel.

Grievance mechanism and remediation system

Remediation systems

We understand that under the UNGPs, should Atlas Arteria identify that it has caused or contributed to adverse human rights impacts, we will provide for, or co-operate, in their remediation (i.e., by providing an accessible, affordable, adequate and timely remedy for the harm).

Following the guidelines set forth by the UNGPs, our responses to any adverse human rights impact will be decided on the basis of the continuum of involvement framework (causing, contributing to or directly linked to), as follows:

REMEDY

We will promptly take steps to remedy the practices in our operations or supply chain, which are causing, contributing to or are directly linked to the harm to avoid causing further harm.

CEASE or PREVENT the impact

We will take immediate actions to cease or prevent any ongoing harm or violation of human rights that may occur.

CEASE or PREVENT the contribution

We will implement measures to cease or prevent our own actions or practices that contribute to human rights violations.

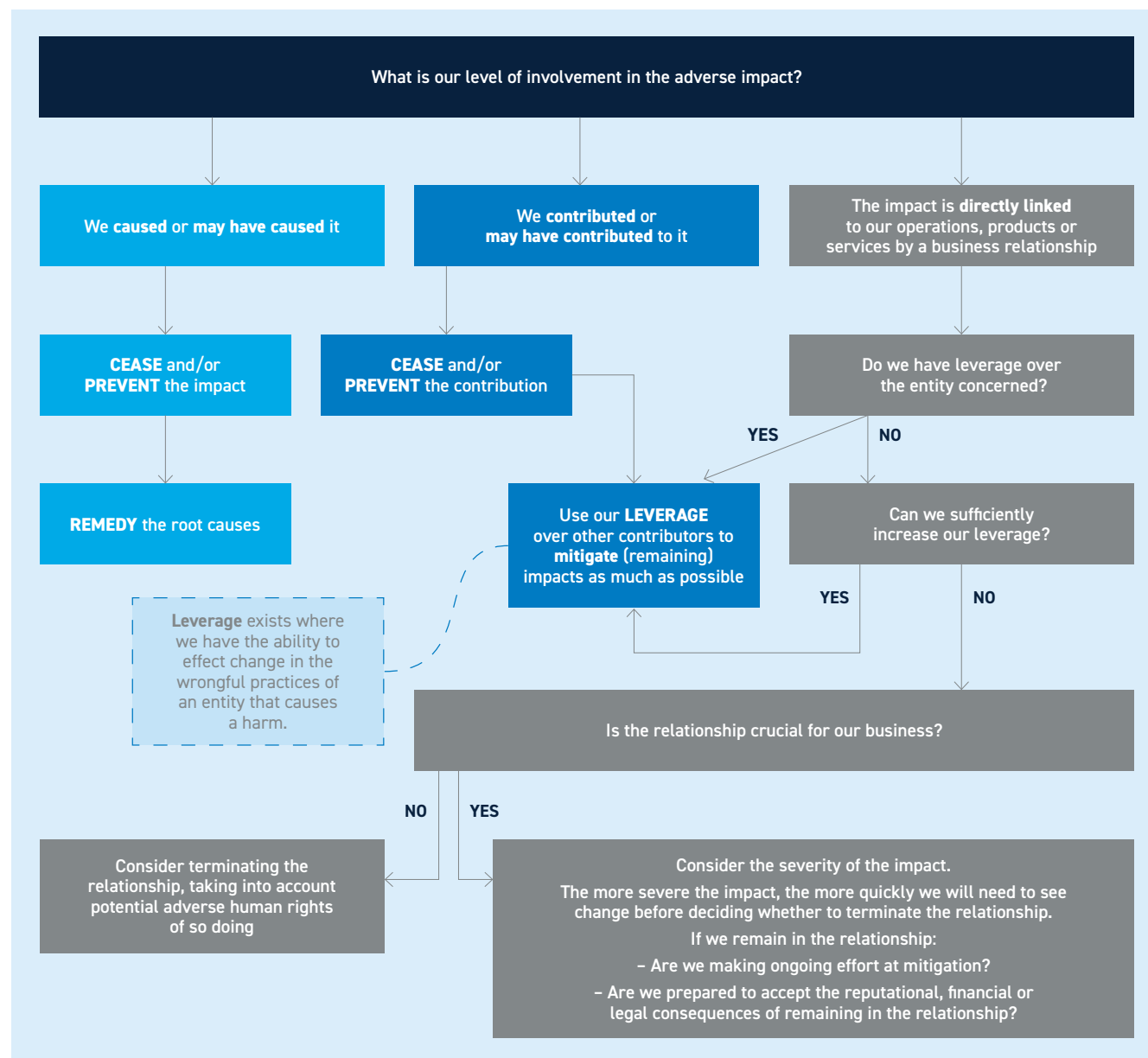
USE LEVERAGE

We will leverage our influence, resources, and partnerships to drive positive change, utilising our position to advocate for and promote human rights.

We will determine our level of involvement based on the framework developed by Business for Social Responsibility (Human Rights Harm Analysis Worksheet), by assessing the following items:

1. Did our actions on their own cause human rights harm?
2. Did we facilitate, enable, or incentivise other parties to cause harm?
3. Could we have known about or foreseen the potential harm?
4. How specific was the connection between our operations and the harm?
5. Did we take steps that likely could have prevented the harm from occurring?
6. Did we directly benefit from the negative impact?
7. Do stakeholders and rightsholders believe that we caused, contributed to, or were directly linked to the harm, or should otherwise provide or contribute to remedy?

Once our level of involvement is established, and on a case-by-case basis, potential courses of actions will be explored, as detailed on the next page.



Grievance mechanism and remediation system

Potential remedial actions

In the event of discovering a human rights breach within our supply chain, there are a range of remedial actions we would consider implementing based on what is appropriate for the circumstances.

CEASE and/or PREVENT the impact

- Immediately halt any ongoing harm or violation of human rights within our operations or supply chain.
- Ensure supplier's workers are informed of our grievance mechanisms, to enable individuals to report violations and seek redress.
- Conduct regular risk assessments to identify potential impacts and implement measures to prevent or mitigate them.
- Enhance due diligence processes to identify and address risks of human rights violations.
- Collaborate with stakeholders and industry experts to develop best practices and standards to prevent the impact of human rights violations.

REMEDY the root causes

- Collaborate with relevant stakeholders to identify and implement solutions that address the root causes of the impact.
- Conduct regular monitoring and evaluation to assess the effectiveness of the remediation program and make necessary adjustments.
- Foster transparency and open communication to rebuild trust and ensure ongoing engagement with affected parties.

CEASE and/or PREVENT the contribution

- Revise internal policies and guidelines to ensure that, to the extent they do not effectively already do so, they explicitly prohibit actions that contribute to human rights violations.
- Where risks are identified, focus on strengthening due diligence processes in that area to ensure suppliers and business partners adhere to human rights standards.
- Implement regular monitoring and auditing mechanisms to identify and address any contribution to human rights violations in circumstances where human rights risks are high or have been identified.
- Provide training and awareness programs to employees and suppliers on human rights issues and their responsibility to prevent contributions to violations.
- Establish clear supplier selection criteria that prioritise companies with strong human rights practices and compliance.
- Engage in proactive collaboration with suppliers to address and rectify any identified contributions to human rights violations.

Use LEVERAGE to mitigate the potential for future violations

- Collaborate with industry peers to establish industry-wide standards and initiatives to combat human rights violations.
- Engage in multi-stakeholder partnerships to address systemic issues and promote responsible practices across the supply chain.
- Advocate for stronger regulations and legislation to ensure human rights protection and transparency in business operations.
- Use the company's purchasing power to influence suppliers and encourage them to uphold human rights standards.
- Implement supplier capacity-building programs to educate and empower suppliers on responsible practices and human rights issues.
- Support and contribute to initiatives that address social and environmental challenges, promoting sustainable development and positive impacts on communities.
- Consider all avenues of potential influence, beyond supplier spend (e.g. publicity, reporting to relevant authorities etc.).

Training program and capacity building

The Atlas Arteria Foundations training program is an integral part of our commitment to promoting a culture of responsibility and awareness throughout our organisation. This program is provided to all employees at our corporate offices on an ongoing basis. As part of our induction process, new corporate employees receive the training as part of their welcome pack and are required to complete it within 45 days of their start date.

The training is designed to ensure that employees have a clear understanding of their role, rights, and responsibilities concerning the topics covered. We prioritise equipping our employees with the knowledge and tools to uphold our principles and standards.

We actively encourage our employees to speak up if they have any concerns regarding Atlas Arteria or our suppliers' practices, including any instances of potential modern slavery or any other misalignment with our principles. Our open-door policy promotes a safe environment for employees to report concerns to their managers or any member of the Executive Team.

By fostering a culture of transparency and accountability, we aim to address any issues swiftly and responsibly. Our commitment to continuous improvement and employee engagement ensures that together, we can safeguard our values and uphold the highest ethical standards in all aspects of our operations.

ALL EMPLOYEES

Code of Conduct (1h)

- Presentation of Atlas Arteria Code of Conduct
- Encouragement for employees to 'Speak Up' and escalate any concerns they have if they witness an unlawful or unethical act

People Matters (1h30)

- Workplace bullying, harassment and discrimination
- Equal employment opportunity
- Workplace health and safety
- Information security essentials

Modern Slavery (1h)

Whistleblower Policy and Framework (2h)

- What whistleblowing is
- Atlas Arteria Policy and Framework

Anti-Corruption and Bribery (1h)

- Stamping out bribery and corruption: why is it important?
- Scenario testing/realistic examples likely to align with the experience of our employees
- Atlas Arteria's Anti-Bribery and Corruption Policy
- Business Expenses Policy

Competition Law (1h)

- Training targeted at real situations our employees may encounter in our business
- Scenario testing/realistic examples likely to align with the experience of our employees
- Connection between these unfair practices and the potential for negative knock-on effects on human rights emphasised, in the context of our STEER values

Privacy/Data Protection (1h)

- Overview of the data protection legislation (as applicable per geography)
- What is personal data?
- Tasks involved in respect of data protection legislation
- Atlas Arteria Privacy Policy

- Various forms of modern slavery in which people can be held and exploited
- The size of the problem and the risk to our organisation
- How employees can identify the signs of slavery and human trafficking, including unrealistically low prices
- How employees should respond if they suspect slavery or human trafficking
- How suppliers can escalate potential slavery or human trafficking issues to the relevant people within their own organisation
- What external help is available for the victims of slavery
- What terms and guidance should be provided to suppliers in relation to slavery policies and controls
- Encouragement to and methods for reporting circumstances which may indicate an elevated risk of Modern Slavery

MODERN SLAVERY WORKING GROUP

Attendance at various webinars/presentations offered by law firms on the topic of human rights/modern slavery.

Completion of online training modules and courses, including:

Australian Border Forces

- Identifying and Assessing Modern Slavery
- Managing Modern Slavery Risks

Australian Human Rights Commission (via University of Technology Sydney)

- Modern Slavery

Amnesty International

- Introduction to Human Rights

UN Academy

- Business and Human Rights: How Companies can Operationalise the UN Guiding Principles

Our training content is reviewed periodically to ensure that it stays up-to-date and relevant to our business. A full review has been conducted in 2022 and updates have been made where necessary. The reviewed program will be roll out throughout 2023.

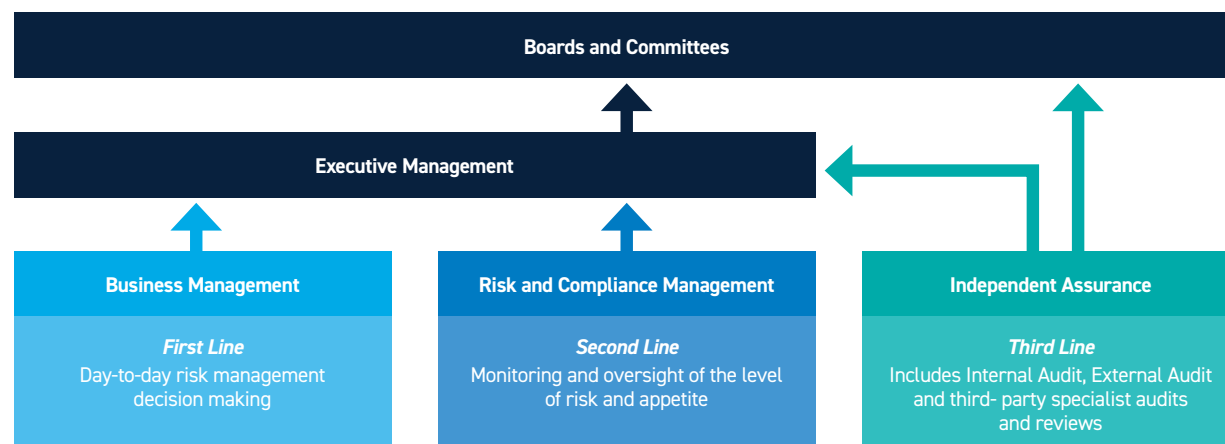
EFFECTIVENESS OF ATLAS ARTERIA'S SYSTEMS



How effective are our systems?

Atlas Arteria's Three Lines of Accountability risk management model provides effective monitoring, oversight and accountability of all risks across our operations. This model is detailed further in our [Risk Management Policy](#). We use formal and informal feedback to refine our risk management and governance processes to improve our management of all risks, including in relation to the management of modern slavery risks.

In 2021, Atlas Arteria introduced a number of Key Performance Indicators (KPIs) to assist with evaluating and monitoring the effectiveness of its Modern Slavery Risk Framework and to assist with identifying any issues with the robustness and maturity of our processes. Our 2021 Modern Slavery Statement reported the outcomes of these KPIs for the first time and we continue to report against them this year. This established our baseline for reporting and assessing the effectiveness of our Modern Slavery Risk Framework. Moving forward, management, in consultation with the Boards, will consider whether additional measures should be introduced, or existing KPIs further tailored to better track our progress.



KPI (all metrics reported over a 12-month period)

Outcomes for FY2022

Employee training: percentage of employees who are in positions needing to identify modern slavery risks trained on modern slavery risks and/or due diligence.

Corporate level: 100%. Note this figure represents nine new employees who commenced in 2022. All other employees have previously completed specific modern slavery training in 2021. This program requires completion by all employees, contractors and consultants working within Atlas Arteria again in 2023 (and every two years thereafter, in our compliance training cycle).

Dulles Greenway: key Dulles Greenway management personnel received modern slavery training in 2022. Training will be rolled out again in 2024 in accordance with our compliance training cycle.

Warnow Tunnel: key Warnow Tunnel management personnel received modern slavery training in 2021. Training will be rolled out again in 2023 in accordance with our compliance training cycle.

Medium/high-risk Tier 1 supplier due diligence: percentage of suppliers with annual spend above 10,000 (in local currency) identified as medium/high risk subject to enhanced (i.e., questionnaires/consultation) due diligence.

In 2022, no suppliers were identified as medium/high risk and therefore required to undergo enhanced due diligence, following the completion of our due diligence processes (including reputational screening and in some cases, further desktop investigation). Atlas Arteria's intention is to engage with maintenance providers and IT hardware and software suppliers at Dulles Greenway and Warnow Tunnel across 2023/2024, to confirm previous due diligence around their workplace policies and improve our understanding of their supplier engagement practices.

Tier 2 investigations: number of corporate Tier 1 suppliers with annual spend above \$50,000 (in local currency) assessed in relation to their own supplier engagement practices.

Corporate level: 100% This year we expanded our review to include all corporate suppliers down to \$10,000 in local currency. Atlas Arteria management will conduct the same investigation for Dulles Greenway and Warnow Tunnel suppliers across 2023/2024.

Grievance/incident reporting: number of modern slavery incidents or grievances reported through internal or external whistleblowing channel.

Corporate level: 0 reports in 2022

Dulles Greenway: 0 reports in 2022

Warnow Tunnel: 0 reports in 2022

CONSULTATION WITH CONTROLLED ENTITIES

The management teams at Warnow Tunnel and Dulles Greenway have been consulted on the modern slavery risk assessment and the development of this Statement.

Key personnel from Warnow Tunnel and Dulles Greenway have also been involved in training on our policies and engaging with suppliers in relation to modern slavery risk management.

Drafts of this Statement have been circulated to the relevant management at the corporate offices and at each of the businesses for comment and input, prior to its publication.

Approval

This Modern Slavery Statement has been reviewed by Atlas Arteria's Executive Team and Audit and Risk Committees prior to being put to the Boards of Atlas Arteria's Australian and Bermudian holding companies for approval.

This Statement was approved following a meeting of the Boards on 22 June 2023.



Graeme Bevans,
CEO and Managing Director, Atlas Arteria

APPENDIX – MANDATORY REPORTING CRITERIA

Criteria	Page(s)
Identify the reporting entity	Page 6
Describe the structure, operations and supply chains of the reporting entity	Pages 8 to 14; refer to pages 15 and 16 regarding Joint Ventures
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Pages 18 to 21; additional information also contained in pages 11 to 14
Describe the actions taken by the reporting entity, and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Pages 22 to 29
Describe how the reporting entity assesses the effectiveness of such actions	Pages 30 to 31
Describe the process of consultation with any entities that the reporting entity owns or controls	Page 32
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Pages 4 to 5; Case study on page 21



ATLAS ARTERIA LIMITED

Level 1, 180 Flinders Street
Melbourne VIC 3000
Australia

Telephone (Australia): 1800 621 694
Telephone (International): +61 (0) 438 493 692
Email: investors@atlasarteria.com
Website: www.atlasarteria.com

ATLAS ARTERIA INTERNATIONAL LIMITED

4th Floor, Cedar House
41 Cedar Avenue
Hamilton HM12 Bermuda

Photography Credits:

Page 6 – APRR: COMBE Ludovic
Page 7 – Warnow Tunnel: Thomas Ulrich
Page 13 – Dulles Greenway: David Madison Photography
Page 14 – Warnow Tunnel: Trent Perrett
Page 16 – Chicago Skyway: MILLER+MILLER
Page 17 – Chicago Skyway: MILLER+MILLER
Page 18 – APRR: Phototec
Page 21 – APRR: Erolf Productions
Page 30 – A480: Christoph Weller