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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.

ABOUT THIS STATEMENT

Atlas Arteria is a dual-stapled structure consisting of 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, along with their subsidiaries (collectively, Atlas Arteria). The securities of ATLAX and ATLIX are stapled and traded together on the Australian Securities Exchange (ASX:ALX).

This is Atlas Arteria's fifth Modern Slavery Statement, covering the financial year ending 31 December 2024, prepared in accordance with the Modern Slavery Act 2018 (Cth) (the Act).

Since ATLAX, ATLIX, and their subsidiaries did not meet the A\$100 million consolidated revenue reporting threshold in 2020, 2021, and 2022, the first three statements were published on Atlas Arteria's website without being lodged with the Attorney-General.

In 2023, following the distributions received from Chicago Skyway, ATLAX's wholly owned subsidiary Atlas Arteria Holdings Australia Pty Ltd qualified as a 'reporting entity' under the Act. Consequently, the fourth statement was lodged with the Attorney-General's Office and filed on the Modern Slavery Statement Register.

In 2024, no entity within the Atlas Arteria Group qualifies as a 'reporting entity.' However, for consistency and to demonstrate our commitment to transparency in relation to addressing modern slavery risks, we have chosen to voluntarily lodge this statement with the Attorney-General.

This statement covers all entities within Atlas Arteria. It outlines the steps taken to assess and address modern slavery risks in our operations and supply chains and details the approach applied by both our controlled and non-controlled businesses.

References to 'Atlas Arteria,' 'us,' 'we,' and 'our' relate to Atlas Arteria's corporate operations and do not include its controlled or non-controlled businesses. Information regarding Atlas Arteria's investments is reported in relation to the relevant business.

We welcome and value feedback. Please direct any enquiries to investors@atlasarteria.com.

Modern Slavery Act criteria

This Statement was prepared to meet the mandatory reporting criteria set out under s16(1) of the Act. The table below identifies where each criterion is disclosed within this Statement.

Modern Slavery Act criteria	Page
Identify the reporting entity	2
Describe the structure, operations and supply chains of the reporting entity	7, 8, 9, 10, 11, 12, 13, 14
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	16, 17, 18, 19, 20
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	22, 23, 24, 25, 26, 27, 28, 29, 30
Describe how the reporting entity assesses the effectiveness of such actions	32, 33
Describe the process of consultation with any entities that the reporting entity owns or controls	34
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	3, 4, 5

Message from our CEO and Managing Director



Atlas Arteria is a values-led business that inherently respects the fundamental rights of every human being.

As a global toll road owner and operator, we can play an important role in helping to combat modern slavery in our industry. This is a responsibility that requires continuous improvement, effort and vigilance.

I am pleased to report - in this, our fifth Modern Slavery Statement - that we became an active member of the United Nations Global Compact (UNGC) in 2024. This demonstrates our commitment to the UNGC's Ten Principles across human rights, labour, environment and anti-corruption and - importantly - to integrating them into our Sustainability Framework and policies. We also published our Human Rights Commitment Statement in March 2024. This aligns with the United Nations Guiding Principles on Business and Human Rights and clearly outlines our commitments, both within our business and our supply chain.

Once again, we have not identified any instances of modern slavery within our supply chain. While our risk remains low, our vigilance remains high; and we are challenging ourselves to look even harder. Accordingly, during the year, we reassessed our supplier risk evaluation approach. We identified areas of improvement and worked to build better systems, equipping ourselves with more effective tools, deeper knowledge and greater expertise so we are better positioned to detect and address potential human rights' violation risks.

In addition, we strengthened our governance arrangements by establishing a Safety and Sustainability Committee of the ATLIX and ATLAX Boards. In 2025, we will also create a dedicated Human Rights Working Group that will report to this committee

During the year, our Sustainability Working Group completed valuable work prioritising the UN Sustainable Development Goals (UN SDGs). Seven SDGs were identified as most relevant to us and important to our stakeholders. Work has begun to set targets against each of these priorities and integrate them into our Sustainability Framework. This focused approach will allow us to have the most meaningful impact, and I look forward to reporting more on this in next year's Sustainability Report.

It's certainly been a year of progress for us, but I want to assure you we know how much this work matters. We hold ourselves, our suppliers and partners, to high standards and we will continue to invest time and effort to ensure we are always making progress in this space.

We are energised by our involvement in the UNGC and the first-hand insights this membership provides into how other businesses are addressing human rights concerns and modern slavery risks. We maintain a learning mindset, and we will continue to evolve as we benefit from, and contribute to, this open dialogue.

At Atlas Arteria, we know the roads we own and operate benefit communities, and we work hard to keep people safe. We're proud of that. Upholding ethical human rights practices in our operations and supply chain, as we operate and develop our roadways, is an extension of this responsibility.

Hugh Wellby

Hugh Wehby

CEO and Managing Director Atlas Arteria Limited



What drives us

We work to create long-term value for our stakeholders through considered and disciplined management and sustainable business practices.

OUR KEY STAKEHOLDERS



Customers







Investors







Communities

Employees

Partners

Governments and regulatory authorities

Suppliers

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 a strong investor value proposition 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 VALUES

At Atlas Arteria, how we achieve success - and the legacy we leave - is as important as the success itself.



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 vision 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.

Our progress in 2024

This page provides an overview of the progress we have made on our 2024 focus areas, as identified in the 2023 Modern Slavery Statement.

While no instances of severe human rights violations or modern slavery were identified in our operations or supply chain in 2024, we remained vigilant and committed to expanding our approach to human rights and modern slavery.

Broader human rights focus

Expanded our strategy beyond modern slavery risks to encompass broader human rights concerns.

Notably, we:

- Released our Human Rights Commitment Statement.
- Commenced participation in UNGC Network Australia learning and networking platforms.
- Engaged with business, academia, and civil society experts.

Enhancing supply chain transparency

Strengthened our supplier due diligence process by implementing an **enhanced third-party due diligence platform**, set to be fully operational in 2025, to improve direct supplier engagement and visibility into tier 2 suppliers.

Improving reporting and whistleblower protection

Transitioned from our previous independent whistleblower service provider to **KPMG's FairCall**, which offers enhanced reporting features.

Strengthening governance and expertise

- Established a Safety and Sustainability Committee of the Boards.
- Secured approval to create a Human Rights Working Group in 2025, under the oversight of the Safety and Sustainability Committee.
- Enrolled in the UNGC Business & Human Rights Accelerator program to advance due diligence expertise.

LOOKING AHEAD

As we continue to strengthen our commitment to uphold human rights within our operations and supply chains, we are setting objectives for the year ahead to deepen our understanding, raise awareness, and assess potential risks through ongoing analysis and action:

- Explore how artificial intelligence is used within our operations and supply chains, including any potential connections to human rights concerns.
- Examine the potential risks of human rights violations associated with the use of our roads, particularly by third-party users.
- Promote greater employee awareness and understanding of modern slavery and human rights issues, including how to recognise signs of exploitation both within and outside our direct business activities.

United Nations Global Compact

In 2024, Atlas Arteria became a member of the **United Nations Global Compact (UNGC)**, affirming our commitment to upholding international human rights, labour rights, environmental sustainability, and anti-corruption principles. This step aligns with our broader objective to strengthen corporate responsibility and ethical business practices across our operations and supply chain.

As part of this commitment, we actively participated in networking and knowledge-sharing events organised by the UNGC Australian Network, including the Annual Conference in Sydney in October 2024. These engagements provided valuable opportunities to exchange learnings with industry peers, academics, and human rights experts, fostering deeper discussions on best practices, challenges, and evolving expectations in modern slavery risk management.

Through these interactions, we gained first-hand insights into how other companies are addressing modern slavery risks, the challenges they face, and the innovative strategies being implemented across industries. This learning process has been instrumental in informing and refining our own approach, ensuring that our methodology remains robust, relevant, and aligned with global standards.

Our participation in the UNGC network has reinforced our belief that human rights risk management is an evolving practice — one that requires continuous improvement, proactive engagement, and cross-sector collaboration. By leveraging the collective knowledge and expertise within the UNGC community, we aim to further enhance our due diligence processes, strengthen supplier engagement, and contribute to broader industry efforts to combat modern slavery and human rights violations.

WE SUPPORT



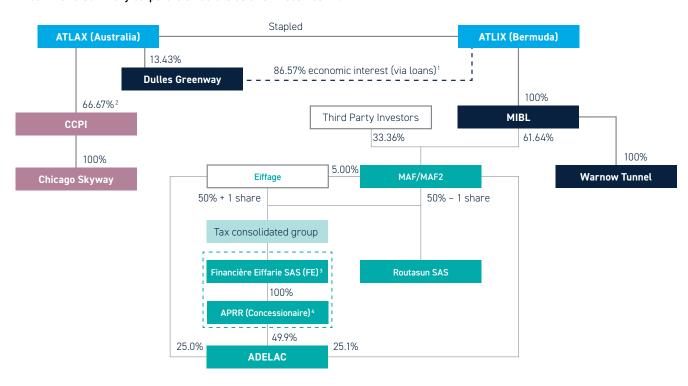
Our structure

To support Atlas Arteria's stapled structure, ATLAX and ATLIX have entered a co-operation deed which provides for the sharing of information, adoption of consistent accounting policies and co-ordination of reporting to securityholders.

The Board of ATLAX sits in Australia. The Board of ATLIX sits in Bermuda. Atlas Arteria is headquartered in Melbourne, Australia. In addition, we have corporate offices in Luxembourg, the United States and Bermuda.

Atlas Arteria's portfolio comprises toll roads businesses located in France, Germany and the United States.

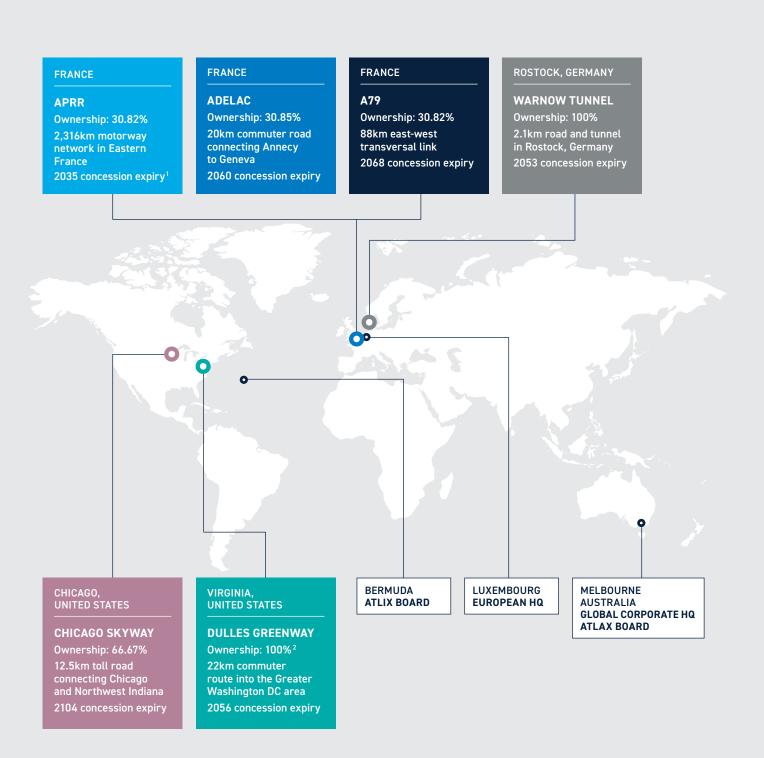
Atlas Arteria summary corporate structure as at 31 December 2024



- 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
- ATLIX and its controlled entities ('ATLIX Group') holds US\$166.7m of shareholder loans in Calumet Concession Partners Inc. (CCPI).
- On 31 December 2023, the Eiffarie SAS entity was dissolved, and its assets and liabilities were transferred into Financière Eiffarie SAS entity (FE), effectively merging the two entities into one. Consequently, FE will now hold directly 100% of the shares in APRR.
- 4. 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



^{1.} APRR concession expires in November 2035, AREA concession expires in September 2036.

^{2. 100%} economic ownership.

Corporate operations

Atlas Arteria's corporate operations provide support 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.

At the end of 2024, Atlas Arteria's corporate workforce was composed of 50 employees (23 women and 27 men).

Gender diversity at Atlas Arteria by seniority

Board (Independent non-executive Directors)



Senior executives1





1. Senior executives include the Atlas Arteria Executive Committee, their senior direct reports and the CEOs and MDs of wholly and majority-owned businesses, including those acting in vacant positions.



Ownership: 30.82%

2,316km motorway network in Eastern France Headcount: 3,574 (1,277 women and 2,297 men)



A79

Ownership: 30.82%

88km east-west transversal link



ADELAC

Ownership: 30.85%

20km commuter road connecting **Annecy to Geneva**



WARNOW TUNNFI

Ownership: 100%

2.1km road and tunnel in Rostock, Germany Headcount: 38 (22 women and 16 men)



Ownership: 66.67%

12.5km toll road connecting Chicago and Northwest Indiana

Headcount: 63 (32 women and 31 men)



Ownership: 100%

22km commuter route into the Greater

Washington DC area

Headcount: 15 (5 women and 10 men)



More details are available in our Sustainability Report

Our supply chain

The profile of our direct supply chain has remained largely consistent over time, primarily comprising long-established suppliers of goods and services.

GEOGRAPHIC ORIGIN OF OUR CORPORATE AND BUSINESSES" DIRECT SUPPLIERS

1. Warnow Tunnel, Chicago Skyway and Dulles Greenway.

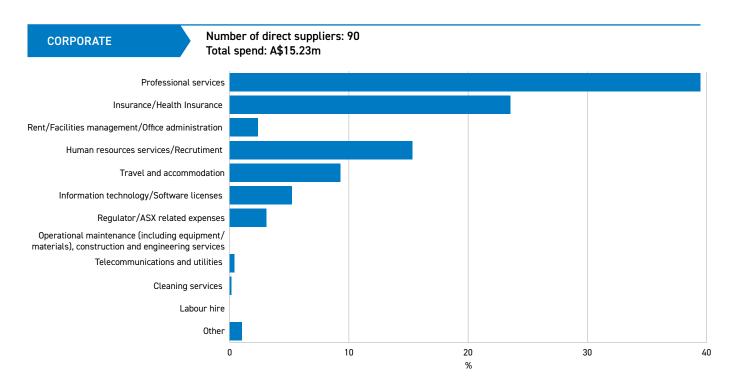


Corporate supply chain profile

Since our first Modern Slavery Statement the profile of our corporate supply chain has remained largely stable, with similar types of suppliers engaged year on year. The primary change each year continues to be the allocation of spending across the different categories of suppliers, which is generally influenced by evolving operational needs.

Direct suppliers ('Tier 1')

In 2024, our total spend reached approximately A\$15 million (compared to approximately A\$18 million in 2023). This expenditure covered our corporate offices and included around 90 direct suppliers (group entities providing services are considered as a single supplier) with an annual spend exceeding A\$10,0001.



In 2024 the largest spending categories continued to be professional services - which include legal, advisory, financial, compliance, audit services and insurance.

Notably, spending in the Human Resources Services/Recruitment category saw a threefold increase compared to 2023. This was primarily driven by executive search efforts, including the appointment of a new CEO, a new executive in the US, and the expansion of our US corporate staff.

Consistent with previous years, 99% of our total spend occurred within the countries where our corporate offices are located.

Improved public disclosure among our Tier 1 suppliers over the years has allowed us to gain better insights into the other tiers of our global supply chain.

Tier 2 and beyond suppliers

We conducted a structured review of Tier 2 suppliers' disclosures across selected categories. In previous years, we performed deepdive reviews of specific suppliers, focusing on identified risks and mitigation strategies as direct partners. In 2024, our goal was to consider suppliers through a different lens, at various levels of our supply chain, identifying strengths, weaknesses, and information gaps to enhance our risk assessment and due diligence process.

We conducted our analysis across four key areas:

Human Rights and Modern Slavery: Assessing policies, due diligence, and actions to prevent human rights violations.

Supply chain risks: Identifying acknowledged risks, including geographical and operational vulnerabilities.

Quality of disclosure: Evaluating the depth, completeness, and reliability of reporting.

Risk assessment: Mapping suppliers against risk levels based on transparency and reporting standards.

The table below summarises our key observations and the inherent risks that could exist due to certain practices. The risks associated with certain industries are general and do not reflect specifically on our Direct Suppliers' practices.

	Professional services	Human resources services/recruitment	Information technology/ software	Travel and accommodation
Profile	Large multinational firms in consulting, legal, and finance, including PwC, KPMG, Deloitte, and EY. They are subject to strict reporting laws.	Global staffing firms and smaller local agencies, operating in a high-risk sector due to labour recruitment practices.	Software providers and IT consulting firms, with indirect exposure to manufacturing supply chains in high-risk regions.	Includes business travel agencies, hotels, and corporate transport providers, operating in a sector with known labour exploitation risks.
Engagement with human rights and modern slavery	Strong commitment due to regulatory requirements and public scrutiny. The largest firms disclose extensively, but smaller firms lag.	Some global firms comply, but local agencies lack transparency. Potential high exposure to exploitative recruitment practices, particularly involving migrant workers, depending on geography.	Reporting levels are better than many service sectors. Limited direct exposure, but reliance on hardware suppliers poses risks.	Most companies provide minimal reporting. Hidden risks in outsourced cleaning, catering, and transport services.
Supply chain risks	These firms increasingly audit their suppliers, particularly office cleaning and IT hardware providers (our Tier 2 or 3 suppliers).	Recruitment agencies often use subcontractors, making oversight difficult. Ethical hiring fees remain a key concern.	Semiconductor and server suppliers (our Tier 2 or 3 suppliers) operate in regions linked to forced labour and conflict minerals.	Many hotels and transport firms rely on outsourced labour, where working conditions are harder to monitor.
Assessment	Strong disclosure/ transparency: This category has robust disclosure and transparency, likely due to regulatory pressure	Concerning transparency: While global recruiters are compliant, many local recruitment firms lack disclosure.	Decent transparency: IT suppliers outperform many other service- based sectors in reporting.	O Underreporting: Hotels and transport companies lag in modern slavery disclosures.
and high public scrutiny. Gaps remain: While the big players disclose extensively, smaller consulting and advisory firms are less transparent.		O High-risk industry: The biggest risk here is exploitative recruitment of migrant and temporary workers, which has been flagged globally.	But supply chain depth matters: Software firms have minimal direct exposure – however, they rely on electronic hardware suppliers with higher modern slavery risks (e.g., semiconductor manufacturers, server suppliers).	Hidden risks: Many hotels rely on outsourced labour (e.g., housekeeping agencies), making exploitation harder to detect.



Businesses' supply chain profile

The supply chain of Warnow Tunnel, Dulles Greenway, and the Chicago Skyway remains fundamentally similar in composition year on respective year, encompassing a broad spectrum of suppliers that support their road operations, maintenance, and business functions. While these supply chains are consistent, we recognise the need for a deeper understanding of their extended supplier networks to enhance transparency and risk management.

Supply chains profile

Each business engages suppliers¹ across key categories, with the allocation of annual spending fluctuating based on operational requirements and project cycles. The primary supplier categories include:

- Maintenance and operations/Construction and engineering – Construction contractors specialising in road and heavy civil engineering, alongside maintenance providers handling routine and emergency road repairs, resurfacing, and infrastructure upkeep.
- Professional services –
 Technical consulting, legal, compliance, and audit services.
- Information technology –
 Toll collection systems, customer account management, payment processing, realtime traffic monitoring, and automated incident detection.

Stability and supplier relationships

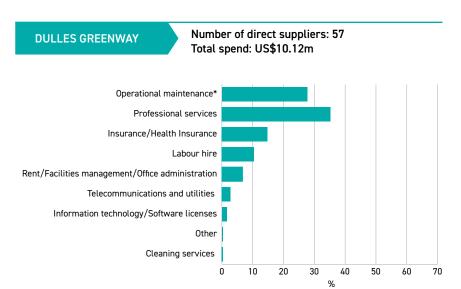
Despite variations in annual spending, each business maintains stable long-term suppliers.

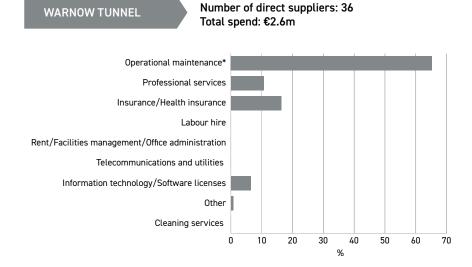
Spend variability and project cycles

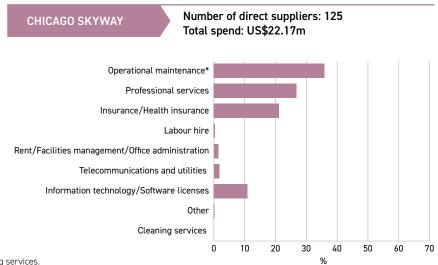
While the overall supply chain structure remains steady, spending patterns fluctuate due to project-driven needs. For example, technical consulting costs may peak ahead of major infrastructure projects, while maintenance expenditures may increase following periods of intense road usage or adverse weather conditions. This dynamic spending allocation reflects the evolving nature of infrastructure development and maintenance.

Enhancing supply chain transparency

Recognising the limitations of traditional supply chain mapping methods, we are looking to advance our approach by fostering greater collaboration with direct suppliers. Through structured engagement - such as targeted questionnaires and enhanced supplier disclosures - we aim to develop, in collaboration with the businesses, a more precise and comprehensive understanding of their extended supplier networks.







- * Includes equipment/materials, construction and engineering services.
- 1. 'Direct suppliers' mean the suppliers with a total spend over €10,000 (Warnow Tunnel) and US\$10,000 (Chicago Skyway, Dulles Greenway).



Atlas Arteria holds an indirect equity interest of 30.82% in the APRR Group and 30.85% in ADELAC.

APRR consists of four motorway concessions: APRR, the A79 and AREA, referred to together as the APRR Group, and the ADELAC concession.

Together, these represent a vital motorway network that is part of multiple transportation corridors for major Western European and intra-France trade and tourism. It provides essential connectivity between Paris and Lyon, France's two largest metropolitan areas.

APRR is France's second-largest toll road network and Europe's fourth-largest motorway group, employing over 3,500 people.

Held at 52.5% by Eiffage (France's third-largest construction and concessions group), 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 follows 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 ILO and Eiffage has confirmed its commitment to complying with them, including those in relation to prohibiting forced labour, prohibition of child labour, discrimination, and freedom of association.

By being a member of the UN Global Compact since 2005, Eiffage made a commitment to incorporate, spread and advance the major UN principles. The UN Global Compact encourages companies to embrace, support and enact, within their sphere of influence, a set of core values in the areas of human rights, labour standards, the environment and anti-corruption. Every year Eiffage renews its commitment to the Secretary General of the United Nations in its 'Communication on Progress'. This document is publicly available and details all the group actions aimed at achieving the objectives defined in accordance with the UN Global Compact principles.

Under the French Duty of Vigilance Law 2017, Eiffage is required to effectively prevent human rights violations and environmental risks, including in its controlled subsidiaries, subcontractors and suppliers. It does so through the establishment, implementation and publication of an annual Duty of Care Plan (Plan de Vigilance). Eiffage's Duty of Care Plan is developed collaboratively between the relevant departments and divisions of the group (including APRR). This is integrated with Eiffage's Annual Report (also known as its Universal Registration Document).

APRR (as part of Eiffage) observes the six key stages of human rights due diligence presented in the UN Guiding Principles. This due diligence process is detailed in Eiffage's Duty of Care Plan, reinforced through the following actions:

- CSR (corporate social responsibility) risk mapping to identify and assess Eiffage's potential negative impacts on human rights. Eiffage assesses these risks as low ('net risk') and therefore they do not appear as a 'major risk' in the group map;
- Adoption in 2023 of a Declaration on Human Rights, complementing the declaration of Eiffage's commitment to the fight against modern slavery and human trafficking;
- Extending access to the whistleblower reporting system 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 set out in its Duty of Care Plan.

Eiffage has not been the subject of any condemnation for noncompliance with human rights. No referral was accepted by a National Contact Point (NCP) of the OECD.

Eiffage stands ready to respond to any question or request for information from the Business & Human Rights Resource Centre (BHRRC) within three months.

Human rights covered by the risk matrix of Eiffage's Duty of Care Plan

- 1. Healthy and respectful relationships with local populations
- 2. Safety of local populations
- 3. Cybersecurity and data confidentiality
- 4. Fight against all forms of modern slavery
- 5. Freedom of association and collective bargaining

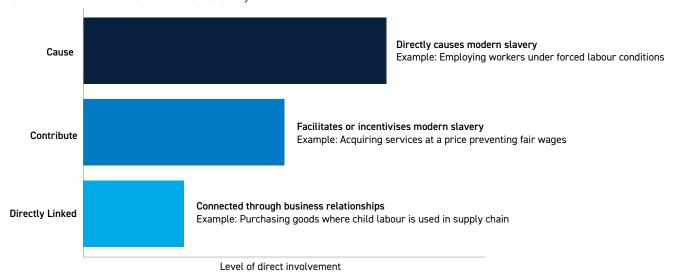
- 6. Labour recruitment practices
- Working conditions Decent, fair and favourable environment
- 9. Discrimination, diversity and inclusion
- 10. Skills development and employability



Modern slavery represents the most severe form of human rights abuse, sitting at the extreme end of the exploitation spectrum. However, we recognise that exploitative conditions do not always emerge in isolation - they can evolve from a combination of systemic issues or accumulative poor practices that gradually lead to unsafe and oppressive working environments.

The United Nations Guiding Principles on Business and Human Rights (UNGPs) remain the global benchmark for businesses in identifying, preventing, and responding to human rights risks, including modern slavery. These principles help businesses determine their level of involvement in actual or potential human rights abuses based on the Continuum of Involvement. We have reassessed and refined our approach in line with the UNGPs, ensuring that we continuously evaluate our level of responsibility and act accordingly.

Continuum of Involvement in modern slavery



We recognise that modern slavery risks do not always fit neatly into these categories, and our assessment of our business involvement is ongoing and evolving.

RISK CATEGORISATION AND EXPOSURE

We also assess modern slavery risks across five key dimensions:			
1. Geographical risks	Countries where weak labour laws, high migrant worker exploitation, or known forced labour practices are present.		
2. Sectoral risks	High-risk industries such as construction, maintenance, cleaning, and IT hardware sourcing.		
3. Supplier risks	Vendors lacking supply chain transparency, ethical sourcing policies, or resisting third-party audits.		
4. Operational risks	Business activities involving outsourced labour, subcontracting, or high seasonal workforce demand.		
5. Regulatory risks	Non-compliance with international human rights standards (e.g., UNGPs, OECD Guidelines).		

In our operations

Atlas Arteria remains committed to identifying and mitigating modern slavery risks within its operations.

Our latest assessment continues to indicate a low risk of modern slavery, based on several key considerations:

- Our operations are based in countries with robust legal frameworks that uphold human rights, enforce fair labour standards, and regulate wages, working conditions, and leave entitlements. We have training and assurance supporting compliance with these legal requirements.
- Our corporate culture strongly emphasises ethical conduct, reinforced through onboarding programs, ongoing training, and regular two-way communication with employees. Our Code of Conduct, coupled with our refreshed 2023 whistleblowing and modern slavery awareness training, encourages employees to speak up about any concerns.
- In December 2024, we introduced an Appropriate Workplace Behaviour Policy, further reinforcing our commitment to a respectful and ethical workplace. This policy, approved by our Boards, sets out Atlas Arteria's zero tolerance for unacceptable workplace behaviour by outlining clear expectations for all employees to uphold dignity, courtesy, and respect in every interaction. Unacceptable workplace behaviours, including discrimination, sexual harassment, harassment, bullying, and conduct contributing to a hostile work environment, are strictly prohibited.
- As part of our proactive approach, all employees will complete the newly introduced 'Atlas Foundations - Respect@Work training module (introduced in December 2024 for completion in early 2025), ensuring an understanding of workplace sexual harassment, sexual discrimination, and hostile work environments based on sex, aligning with Australia's Respect@Work legislation. Employees are required to acknowledge their commitment to these requirements.
- We maintain a highly skilled, professional workforce with minimal reliance on outsourcing. A comprehensive review of hiring practices, employee profiles, and workplace policies in 2021-22 found no evidence of modern slavery risks.
- With a lean organisational structure and a culture of open and regular two-way communication, employees have direct access to management and leadership which ensures timely and appropriate responses. Employees can report any concerns to their managers, executive team members, or through our independent whistleblower service, ensuring timely and appropriate responses.

Beyond ensuring legal compliance, Atlas Arteria places significant importance on employee well-being. Our annual employee engagement survey provides a confidential platform for employees to share concerns and suggestions, shaping continuous workplace improvements. In addition, our 'no wrong door' approach encourages employees to report unacceptable workplace behaviour through any manager, leader, or our multilingual whistleblower reporting service. We are committed to ensuring that individuals who raise concerns are protected from victimisation.

Atlas Arteria's Employee-Centric Initiatives

Through these initiatives, Atlas Arteria reinforces its proactive approach to ethical labour practices, human rights protection, and workplace integrity, ensuring continuous vigilance against modern slavery risks.

Fostering a safe and inclusive workplace

Our Code of Conduct and Appropriate Workplace Behaviour Policy set clear expectations for behaviour, reinforcing our commitment to a workplace free from discrimination, harassment, and bullying. Honest, open, and regular two-way communication via various channels, along with formal development opportunities and wellbeing support programs, ensures that employees feel supported and valued.

Ensuring data protection and privacy

We implement stringent data protection measures to safeguard employees' personal information. Our Privacy Policy governs data handling in compliance with relevant laws, and we provide periodic training on data security best practices.

Upholding fair and ethical employment standards

Compliance with labour laws is a fundamental priority. We uphold wage standards, promote equal pay for equal work, and ensure safe working conditions through our Workplace Health and Safety Policy.

Enhancing employee engagement and well-being

We foster a culture of continuous improvement by actively listening to formal and informal employee feedback. Our well-being programs include flexible working conditions, mental health resources, and wellness initiatives, including access to Employee Assistance Programs for employees and their immediate family members.

Advancing Diversity, Equity, and Inclusion (DEI)

We are committed to building a sustainable and values-driven workplace. Our Diversity and Inclusion Policy supports equitable opportunities in recruitment, retention, and career progression, and promotes a safety-first, inclusive culture in which our STEER values guide us.

Prioritising employee health and well-being

We invest in programs that support physical and mental well-being, including mental health and well-being workshops, regular team meetings, Town Halls, and all-in days to promote social as well as professional connections.

In our supply chains

Atlas Arteria remains committed to strengthening its approach to modern slavery risk management, continuously refining our understanding and response to emerging risks. While our supply chain represents our most significant exposure to modern slavery risks, we remain confident our Tier 1 suppliers present a low risk. The composition of our supplier base remains relatively stable year-on-year, and our ongoing assessments indicate that the risks identified in previous Modern Slavery Statements remain relevant.

We continue to prioritise contracting with well-established, reputable local suppliers working in countries with typically lower modern slavery risks. Many of our larger suppliers maintain robust risk management frameworks and are subject to modern slavery reporting obligations in Australia or other jurisdictions such as the UK. However, we recognise that smaller, local suppliers often lack the same level of structured risk management. While our due diligence suggests these suppliers do not pose a direct risk, their small-scale operations often pose challenges for usual due diligence methods of platform-based screening and desk top reviews (i.e., less publicly available information or regulatory reporting requirements mean disclosure about the company's policies and operations is limited). Further, these suppliers have limited internal oversight which increases the potential for modern slavery risks deeper within their supply chains.

Understanding and addressing these gaps remains a priority. We acknowledge risk is not solely determined by geography or supplier size but is influenced by multiple factors, including the nature of the workforce, industry sector, and supplier management practices. Our approach to risk assessment continues to evolve, incorporating a more nuanced analysis that goes beyond broad categorisations. For example, a supplier operating in a high-risk country with strong mitigation measures may present a lower actual risk than a supplier in a lower-risk jurisdiction with inadequate oversight.

We recognise our scale and procurement spend may limit our direct influence over supplier labour arrangements. However, our long-term relationships with many suppliers provides a foundation for deeper engagement moving forward. Where risks are identified, we are committed to working collaboratively with our suppliers to strengthen their awareness and capabilities in mitigating modern slavery risks within their own supply chains.



Our approach

We take a targeted, risk-based approach to assessing human rights violations, not limited to modern slavery risks. This broader framework ensures human rights risks are considered beyond modern slavery, addressing fundamental labour rights, workplace safety, and ethical supply chain practices.

Our modern slavery risk model aligns with the UNGPs Continuum of Involvement, assessing whether we cause, contribute to, or are directly linked to risks.

Given the nature of our corporate and business operations, we applied the 'continuum of involvement' framework. Our assessment confirmed that while we do not cause or contribute to modern slavery risks, there may be instances where we are directly linked to such risks through our supply chains.

Based on this evaluation, and considering the operational scope of Atlas Arteria and its controlled businesses, we have identified the following areas as carrying a potentially higher risk of human rights violations:

Identified risk categories	Potential risks	Human rights concerns	Potential level of involvement
Offshore labour (industry, geography)	Use of financial and professional services providers which outsource some work in low-cost geographies with weaker labour regulations and legal protections.	Forced labour, debt bondage, deceptive recruitment, fair wage concerns, lack of collective bargaining rights, and/or discriminatory employment practices.	While the risk of modern slavery is relatively low due to the skilled nature of the workforce, there is a potential risk of being directly linked to exploitative labour conditions, wage suppression, and restricted worker rights.
Labour hire (industry, supply)	Use of labour hire agencies for toll booth operations and other contract-based roles.	Forced labour, debt bondage, deceptive recruitment, job insecurity, wage theft, lack of benefits, and/or unsafe working conditions.	Potential risk of being directly linked to labour exploitation, particularly for vulnerable populations such as migrant workers, who may face unfair contracts, inadequate pay, and poor working conditions.
Facilities and cleaning services (industry)	Outsourced cleaning services for corporate offices and controlled businesses.	Forced labour, debt bondage, unfair wages, exposure to unsafe working environments, lack of access to grievance mechanisms.	Potential risk of being directly linked to exploitative labour conditions where workers often come from vulnerable communities with limited bargaining power.
Construction, maintenance and road operations (industry, supply)	Third-party contractors for construction and maintenance of roads, service centres, and tolling infrastructure.	Forced labour, debt bondage, child labour, fair wage concerns, unsafe working conditions, and/or lack of union representation.	Potential risk of being directly linked to labour rights violations if contractors or their suppliers rely on materials sourced from high-risk geographies or fail to provide adequate worker protections. Risks vary based on materials used (e.g., bricks, concrete, solar panels).
IT materials (industry, supply)	Procurement of technology hardware such as laptops, monitors, and tolling technology.	Forced labour, child labour, deceptive recruitment, electronic waste disposal hazards, supply chain transparency issues, and/or unfair wages.	Potential risk of being directly linked to labour exploitation when sourcing goods that may contain components manufactured under exploitative conditions, including child or forced labour. Additional concerns include inadequate electronic waste management and environmental damage.
Hotels and accommodation (industry)	Use of hotels worldwide for business-related travel.	Forced labour, deceptive recruitment, human trafficking, wage theft, workplace harassment, unsafe working conditions, discrimination against migrant workers.	Potential risk of being directly linked to human rights violations within the hospitality industry, where vulnerable workers may face exploitation, discrimination, or unsafe working conditions.

CASE STUDY

Re-thinking our human rights approach

In 2024 Atlas Arteria reassessed its supplier risk evaluation methodology. This was not just about refining processes – it was about challenging ourselves to look harder at our approach to human rights.

We began by reviewing our supplier monitoring platform, identifying gaps in scope, adaptability, and risk detection. After benchmarking against industry best practices, we selected Ethixbase360 to enhance our assessments with deeper analytics, broader risk indicators, and a more dynamic methodology. Alongside this transition, we updated our risk criteria matrix to better reflect human rights risks across industries, geographies, and supplier categories.

To embed this shift into our governance processes, we have established a Human Rights Working Group, which is set to launch in 2025 with support and oversight from the Safety and Sustainability Committee. This will ensure that risk identification, supplier engagement, and mitigation strategies remain central to our approach.

But processes alone are not enough. Real change happens when people engage. That's why we have broadened the conversation - moving beyond modern slavery to the wider human rights landscape. By joining the United Nations Global Compact and engaging employees in identifying the SDGs we will champion, we are making this a shared responsibility. At Atlas Arteria, human rights are not just a policy - they are a commitment we all own.

Commitment to the UNGC's Ten Principles and the UN Sustainable Development Goals

During the year, we undertook an assessment to determine where our business is best placed to positively impact the UN Sustainable Development Goals (SDGs) to help us identify the most appropriate areas of focus. The assessment was conducted by our Sustainability Working Group, with both internal and external consultation, and applied the UN SDG Compass framework as a guide to consider impacts along Atlas Arteria's value chain. Seven SDGs emerged as priorities for Atlas Arteria, based on where we can achieve the most meaningful impact. In 2025 we will work to identify appropriate targets and actions for each priority SDG and define indicators that will enable us to assess our progress.



More details are available in our Annual Report and Sustainability Report

OUR PRIORITY UN SDGS

GOOD HEALTH AND WELL-BEING

Ensure healthy lives and promote well-being for all at all ages - focus on road safety and employee wellbeing

DECENT WORK AND ECONOMIC GROWTH

Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all - focus on labour and human rights, and economic growth



INDUSTRY, INNOVATION AND INFRASTRUCTURE

Build resilient infrastructure. promote inclusive and sustainable industrialisation and foster innovation focus on providing reliable and resilient infrastructure

LIFE ON LAND

Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss - focus on nature and biodiversity









SUSTAINABLE CITIES AND COMMUNITIES

Make cities and human settlements inclusive, safe, resilient and sustainable - focus on sustainable infrastructure and linking to low carbon transport options

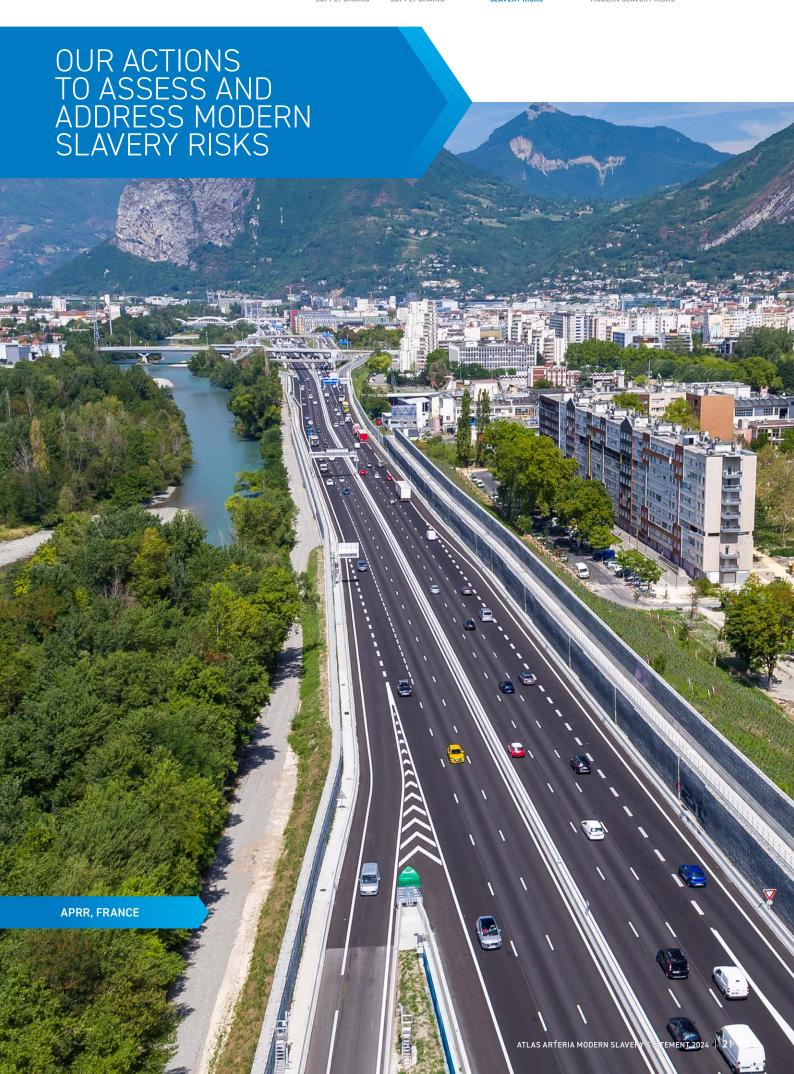
CLIMATE ACTION

Take urgent action to combat climate change and its impacts - focus on decarbonisation for our businesses, customers and suppliers, and on infrastructure resilience



RESPONSIBLE CONSUMPTION AND PRODUCTION

Ensure sustainable consumption and production patterns - focus on pollution, water and waste management and minimising consumption of non-renewable resources



Atlas Arteria's approach to modern slavery is part of our broader human rights strategy, shaped by the UNGPs. We recognise that human rights due diligence is an ongoing responsibility - one that is most effective when deeply embedded in our risk management, governance, and procurement processes.

Since 2020, we have progressively strengthened our Modern Slavery Risk Framework, beginning with the establishment of our Modern Slavery Working Group to develop a modern slavery roadmap and assess risks within our operations and supply chains. As our expertise has grown, so has the sophistication of our approach.

We have taken decisive actions each year to refine our approach:

- In 2021, we upgraded our due diligence capabilities with a thirdparty screening tool to enhance supplier assessments.
- In 2022, we extended our modern slavery risk assessments to Tier 2 suppliers, recognising the need for deeper visibility into multi-tier supply chains.
- In 2023, we developed and articulated a Human Rights action plan, including the publication of our Human Rights Commitment Statement. We also initiated the process for our admission as a participant in the UNGC, further aligning our practices with global human rights standards.

Building on these efforts, 2024 has been a year of advancement:

- We transitioned to Ethixbase360, a more sophisticated supplier due diligence platform, enhancing our ability to assess modern slavery risks with greater accuracy and depth.

- We reviewed and refined our risk criteria matrix, ensuring that our assessment methodologies align with global best practices.
- We strengthened our governance structures, establishing a Human Rights Working Group under the oversight of the Safety and Sustainability Committee, which will become fully operational in 2025.
- We expanded our internal training and awareness initiatives. further embedding human rights considerations into our risk management frameworks and ensuring a globally consistent approach across all controlled businesses.

While we acknowledge that entirely eliminating modern slavery risks is unlikely, we are confident that our strengthened framework significantly mitigates these risks. Our approach - built on robust policies, enhanced due diligence, supplier engagement, and targeted risk assessment - provides a strong foundation for identifying, preventing, and addressing these risks.

We also recognise that reporting misconduct or concerns may be challenging for vulnerable workers. As part of our commitment to fostering a culture of transparency and accountability, we continue to improve access to safe reporting mechanisms and actively engage stakeholders to promote responsible business practices. Through these actions, Atlas Arteria remains dedicated to combatting modern slavery, protecting workers' rights, and upholding ethical standards across our operations and supply chains.



Governance

Atlas Arteria's governance framework (as outlined in our annual Corporate Governance Statement is founded on a comprehensive set of policies and procedures that uphold our Vision and Values. Combined, these support the effective management of modern slavery and broader human rights risks.

Atlas Arteria is dedicated to complying with all laws and regulations in the jurisdictions in which it operates. Our policies unequivocally prohibit any activities related to modern slavery, emphasising not only the risks to our business but also the prevention and mitigation of risks to workers and the maintenance of a safe environment for all.

Strengthening board oversight and risk accountability

- Modern slavery governance is overseen by the Safety and Sustainability Committee, ensuring strategic alignment.
- A newly established Human Rights Working Group will oversee supplier due diligence, risk escalation, and consider stakeholder engagement.

Key governance responsibilities include:

- Board oversight: The Board reviews modern slavery risk assessments bi-annually.
- Supplier accountability: High-risk suppliers are required to undergo annual ethical audits, if considered necessary.
- Stakeholder engagement: Collaboration with industry groups, regulatory bodies, and human rights organisations.

Alongside our Human Rights Commitment Statement (2024), which affirms Atlas Arteria's commitment to upholding human rights across its business and supply chains, the key policies supporting our Vision and Values include:

Policy	Description	Last reviewed date
Code of Conduct	Sets out the standard of behaviour expected of directors, employees, contractors, and consultants, reflecting Atlas Arteria's Vision and Values.	Ongoing
Workplace Health and Safety Policy	Outlines the requirements for identifying and managing workplace health and safety risks in Atlas Arteria's operations.	December 2023
Diversity and Inclusion Policy	Establishes Atlas Arteria's commitment to diversity and inclusion in the workplace.	December 2021
Appropriate Workplace Behaviour Policy (internal)	Defines expectations for professional and respectful behaviour in the workplace, including measures against sexual harassment and discrimination.	December 2024
Sustainability Policy	Outlines requirements for managing environmental and social risks within our operations.	February 2025
Risk Management Policy	Describes Atlas Arteria's risk management approach, including responsibilities for identifying, managing, and mitigating risks.	2024 (annual review)
Anti-Bribery and Corruption Policy	Prohibits any form of bribery or corruption, whether direct or indirect, to advance business interests.	December 2024
Whistleblower Policy	Defines the process for reporting misconduct and outlines the process for investigations, where appropriate.	December 2024
Supplier Code of Conduct	Sets out the values, expectations, and obligations that Atlas Arteria's suppliers must follow.	July 2024
Privacy Policy	Outlines requirements for handling and protecting personal information collected by us.	Subject to review
HR Policy Manual (internal)	A comprehensive set of internal policies, including workplace health and safety, equal opportunity, flexible work, and data protection.	Ongoing

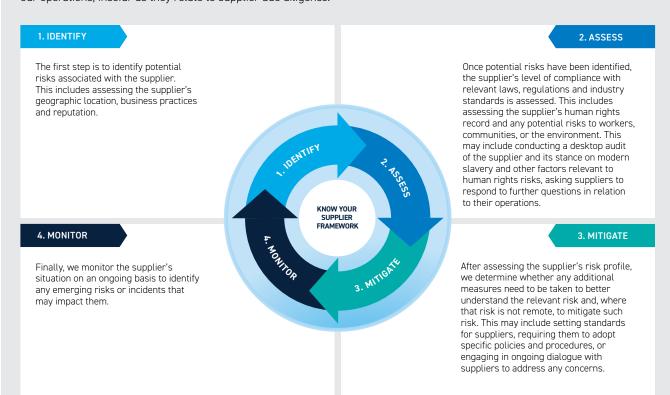
Dulles Greenway and Warnow Tunnel operate independently, each with management structures and policies designed to suit their unique operational and legal contexts. However, despite these differences, they are guided by the same core principles and values, ensuring alignment with Atlas Arteria's governance framework, policies, and procedures wherever practicable.

Atlas Arteria's policies and procedures may apply to our controlled businesses in two ways: directly, when there is a policy gap, or indirectly, through adaptation to align with local regulations and practices while maintaining consistency with the overarching principles in Atlas Arteria's policies.

Supplier due diligence and risk management framework

Atlas Arteria's due diligence and supplier engagement process follows the 'Know Your Suppliers' framework, based on the UNGPs guidelines.

While practices may differ between Atlas Arteria and its controlled businesses (Dulles Greenway and Warnow Tunnel), we aim to apply substantially similar underlying principles, and to harmonise the practices and processes throughout our operations, insofar as they relate to supplier due diligence.





Stage	Key actions	Description
1. IDENTIFY		
Comprehensive supplier screening	Pre-engagement due diligence	Employees must follow Atlas Arteria's Delegation of Authority Policy (DOA). Supplier due diligence is mandatory for contracts exceeding A\$50,000 annually, conducted via our third-party risk monitoring platform.
	Global risk intelligence	Suppliers engaged by Atlas Arteria below A\$50,000 and suppliers engaged by Atlas Arteria's controlled businesses (Warnow Tunnel, Dulles Greenway), and the non-controlled Chicago Skyway with annual spend over 10,000 in local currency undergo screening for regulatory violations, financial instability, and adverse media on an annual basis.
2. ASSESS		
Enhanced risk evaluation	Reputational risk screening	If initial screening raises concerns, a desktop audit using external reports, NGO databases, and government sources assesses compliance with social and ethical standards.
	Targeted questionnaires	High-risk suppliers may be required to complete tailored assessments on corporate policies, employment practices, and exposure to human rights risks, including modern slavery and bribery.
	Site inspections and external validation	If necessary, potential on-site visits will be conducted to ensure alignment between policy and practice. Independent audits, industry certifications, and compliance databases may provide additional verification.
3. MITIGATE		
Proactive risk reduction	Supplier code of conduct enforcement	Atlas Arteria seeks compliance with its Supplier Code of Conduct as a contractual obligation. Material breaches may lead to contract termination.
	Contractual risk safeguards	Atlas Arteria seeks high-risk suppliers to adhere to enhanced contract provisions, including transparency clauses, audit rights, and performance-based evaluations.
	Capacity building and ethical training	Where feasible, suppliers may receive training on responsible business practices, labour rights, and anti-corruption measures.
	Sustained supplier engagement	Where it is considered appropriate, performance reviews, structured dialogues, and feedback mechanisms foster ongoing improvement.
4. MONITOR		
Ongoing risk surveillance and accountability	Continuous real-time monitoring	Our third-party risk platform enables real-time alerts on compliance issues, regulatory breaches, or ethical concerns.
	Periodic supplier risk reviews	Where considered necessary, reassessments may be carried out to ensure risk evaluations remain current, particularly in response to geopolitical, environmental, or industry changes.
	Escalation and governance oversight	Periodic risk reviews are undertaken to identify emerging issues. Critical risks are discussed in monthly supplier due diligence meetings, where mitigation actions, engagement adjustments, or contract terminations are determined.

Training and awareness

All new Atlas Arteria corporate employees receive training on our Code of Conduct, modern slavery and whistleblowing procedures during their induction. These training modules form part of our broader 'Atlas Foundations' program (detailed below). We provide refresher training every two years and give updates as to any relevant changes in law, as necessary.

The training is designed to ensure that employees have a clear understanding of their role, rights, and obligations. We prioritise equipping our employees with the knowledge and tools to uphold our principles and standards, as set out in our policies and described in detail in our training programs.

An outline of our program is set out below.

ALL EMPLOYEES

Code of Conduct (1h)*

- Presentation of the 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 (1h 30)*

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

Modern Slavery (1h)

Whistleblower Policy and Framework (2h)

- What whistleblowing is
- Atlas Arteria Policy and framework
- + Whistleblower refresher pack for eligible recipients (30 min)
- + In-person workshop for management and eligible recipients (1h)

Anti-Bribery and Corruption (1h - in person)

- 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 Vision and Values Statement
- + In-person workshop for selected staff in Australian HQ (1.5h) (recording available to all employees afterwards)

Data Protection (general awareness)/GDPR (Luxembourg) (1h)

- Overview of the general data protection legislation
- Atlas Arteria Privacy Policy
- Tasks involved in respect of data protection legislation

Cybersecurity (online modules and regular awareness communications)

- Security Awareness Proficiency Assessment
- Regular awareness via test emails/simulated phishing attempts

Insider Trading (1h)

- Understanding insider trading regulations
- Identifying and preventing insider trading

Continuous Disclosure (1h)

- Regulatory requirements for continuous disclosure (ASX Listing Rules)
- Best practices for effective disclosure management

- Various forms of modern slavery in which people can be exploited
- The size of the problem and the risk to our organisation
- How employees can identify the signs of slavery and human trafficking
- How employees should respond if they suspect slavery or human trafficking
- How suppliers can escalate potential slavery or human trafficking issues
- External help available for the victims of slavery
- Guidance should be provided to suppliers in relation to slavery policies and controls
- Encouragement and how to report circumstances which may indicate an elevated risk of modern slavery

MODERN SLAVERY WORKING GROUP

Regular attendance to seminars and online trainings offered notably on business and human rights, modern slavery, and whistleblower legislation.

'Atlas Foundations' current training program has been in place since 2020, with updates to the training modules being made over the years. In 2025, a refreshed compliance training program will be launched via a new online training platform. While the program will consist of the topics outlined above, the training modules will be entirely new, with enhanced content more tailored to Atlas Arteria's policies.

Grievance mechanisms

Atlas Arteria is committed to upholding human rights by ensuring accessible, transparent, and effective grievance channels. These channels enable employees, suppliers, and other stakeholders to raise concerns related to unethical conduct, human rights violations, or other workplace issues. These mechanisms align with the UNGPs, ensuring that grievances are addressed through a fair, confidential (where required or requested), and rights-respecting remediation framework.

Reporting mechanisms

Internal grievance resolution

Employees are encouraged to resolve concerns directly where possible or escalate them through formal grievance channels, including their manager, senior leadership, or, where necessary, the CEO or Group Executive Legal, Risk and Governance. If required, an independent third party may be engaged to facilitate a resolution. Atlas Arteria ensures that all grievances are managed promptly, fairly, and in line with due process.



In 2024, no concerns relating to human rights violations were raised through internal channels.

Whistleblower system

Atlas Arteria provides both internal and external channels for reporting unethical, unlawful, or irresponsible conduct - including breaches of internal policies, laws or regulations, or materially adverse operational incidents. Internally, reports may be made to a Whistleblower Protection Officer, who ensures confidentiality, protection, and oversight of investigations (if required).

Externally, reports may be made to FairCall, a secure, web-based and phone-based whistleblower service operated by KPMG, allowing reports 24/7 in multiple languages. This service provides an alternative, anonymous reporting mechanism in cases where internal channels may not be appropriate or effective. Reports can be submitted online, via telephone, or by mail, with protections in place against retaliation, which ensure compliance with non-retaliation principles under international human rights standards.

Clear instructions on how to make a report are outlined in our Code of Conduct, Supplier Code of Conduct, and Whistleblowing Policy, as well as through on-site notices and our website.

The Audit and Risk Committee is notified of all material reports, ensuring high-priority issues receive immediate attention.



In 2024, no whistleblower reports of human rights violations were submitted.

Commitment to effective remedy

All concerns raised through these mechanisms will be investigated as appropriate and to the extent permitted by law. Findings from any investigation will help inform corrective action and allow us to continually improve our governance and supply chain due diligence processes. Atlas Arteria is committed to ensuring that grievances and whistleblower reports lead to meaningful resolution and, where necessary, appropriate remedy in accordance with our human rights' due diligence framework and OECD Guidelines for Multinational Enterprises:

Assessment

Review of the report for urgency and severity

Information gathering

Involvement of relevant internal and external stakeholders for additional details

Immediate action

Implementation of interim protective measures, if necessary, to prevent harm

Support for victims

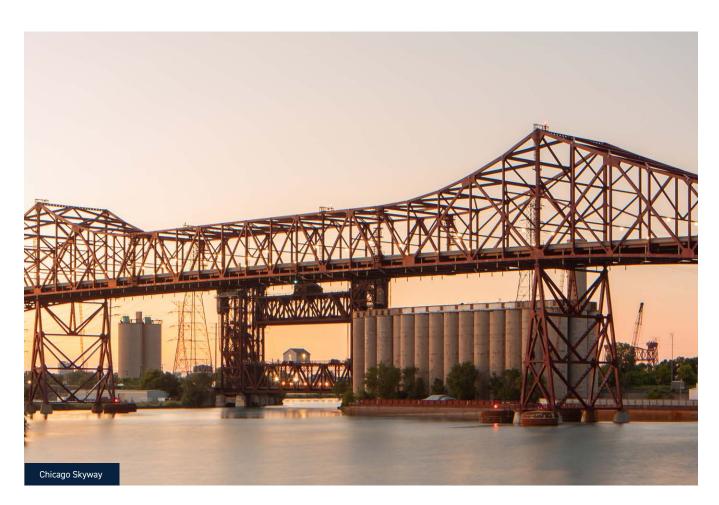
Availability of psychological and social support services, along with Employee Assistance Programs, where appropriate

Remediation systems

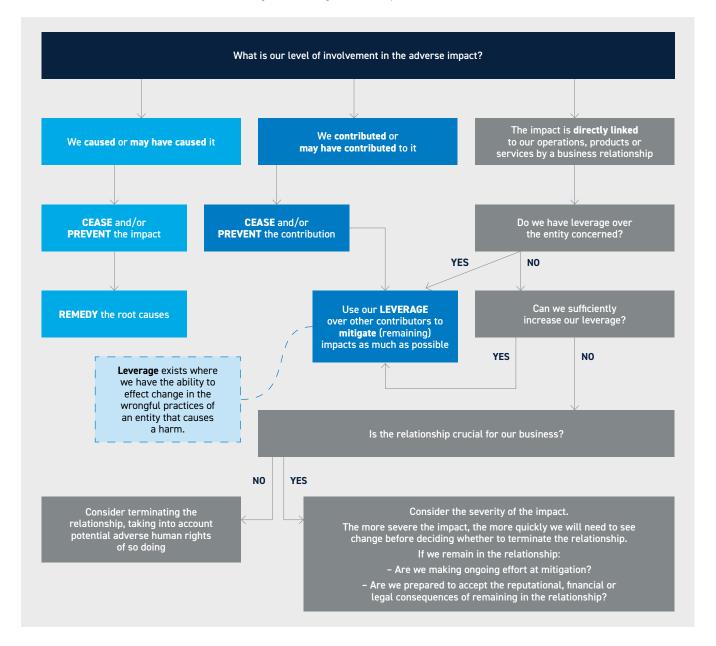
In the event we have caused or contributed to adverse human rights impacts, we will provide for or co-operate in any remediation (i.e., by providing an accessible, affordable, adequate and timely remedy for the harm) in accordance with the UNGPs.

We will assess our involvement in potential or actual human rights harm in order to determine the appropriate corrective actions based on the criteria set out by the Business for Social Responsibility (BSR) Human Rights Harm Analysis Worksheet:

Assessment criteria	Key questions	Purpose
1. Direct causation	Did our actions directly cause human rights harm?	Determines if the company's operations, policies, or decisions directly led to harm.
2. Facilitation or enablement	Did we facilitate, enable, or incentivise other parties to cause harm? Assesses whether the company indirectly conharm through business relationships, financial incentives, or lack of oversight.	
3. Foreseeability	Could we have known about or foreseen the potential harm?	Evaluates whether risks were reasonably foreseeable based on available information, industry norms, or prior warnings.
4. Proximity to harm	How specific was the connection between our operations and the harm? Measures the closeness of the link between company's business activities and the harm.	
5. Preventive actions	Did we take steps that likely could have prevented the harm from occurring? Analyses whether the company had due dil mechanisms or risk-mitigation measures in	
6. Benefit from harm	Did we directly benefit from the negative impact? Examines whether the company profited from har practices, increasing its responsibility for remedia	
7. Stakeholder perceptions	Do stakeholders and rights holders believe we caused, contributed to, or were linked to the harm?	Considers public perception and expectations , which influence reputational risk and responsibility for providing remedies.



Following the guidelines set forth by the UNGPs, our response 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:



Potential remedial actions

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



MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAINS OUR ACTIONS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS EFFECTIVENESS OF OUR ACTIONS TO ADDRESS MODERN SLAVERY RISKS CONSULTATION AND ENGAGEMENT

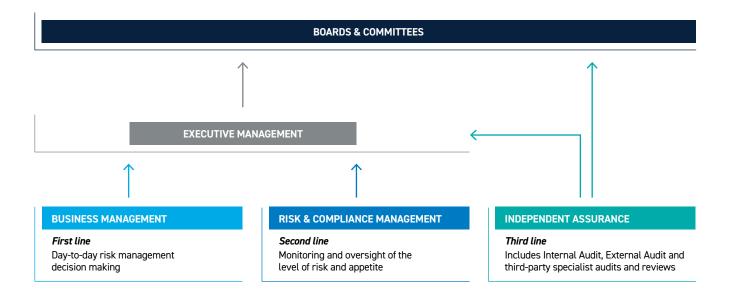


Effectiveness of our actions to address modern slavery risks

The UNGPs state that businesses should track the effectiveness of their human rights responses on the basis of appropriate qualitative and quantitative indicators, to determine whether policies are being implemented optimally, ascertain effectiveness and drive continuous improvement.

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.



Atlas Arteria uses several KPIs to assist in evaluating and monitoring the effectiveness of its Modern Slavery Risk Framework and to identify any issues with the robustness and maturity of our processes, as follows:

KPI (all metrics reported over a 12-month period)	Outcomes for 2024
Employee training (Modern Slavery): percentage of employees who are in positions needing to identify modern slavery risks that have completed the modern slavery risks and/or due diligence training module.	100%. All new starters completed modern slavery training in 2024. Employees are required to complete the training within 45 days of starting employment.
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 subjected to enhanced (i.e., questionnaires/consultation) due diligence.	In 2024, no suppliers were identified as medium/high risk for modern slavery through our ongoing monitoring due diligence and therefore no enhanced due diligence was undertaken.
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.	As part of the review conducted in relation to our Tier 2 suppliers' disclosures (see pages 11–12), 39 corporate Tier 1 suppliers with annual spend above 50,000 (in local currency) were assessed in relation to their own supplier engagement practices, across the following categories: - Professional services, Human resources/recruitment; - Information technology/software, and - Travel and accommodation.
Grievance/incident reporting: number of modern slavery incidents or human rights violations reported through internal or external whistleblowing channels.	Corporate level: 0 reports Dulles Greenway: 0 reports Warnow Tunnel: 0 reports

As these have been in place since 2021, it was announced in the 2023 Statement that a review of the KPIs would be conducted to evaluate their continued effectiveness and appropriateness, and consider whether additional measures should be introduced, or existing KPIs further tailored to better track our progress.

Effectiveness of our actions to address modern slavery risks

While they provided some insights, we acknowledged that the current KPIs do not fully capture the effectiveness and progress of our human rights/modern slavery risks management efforts.

Updated KPIs, including outcome-oriented measures, were presented to the Safety and Sustainability Committee and approved by the Board in December 2024. These better capture the effectiveness and progress of our human rights/modern slavery risks management efforts. They will be implemented from 2025 onwards, strengthening our ability to track, assess, and enhance our human rights due diligence.

Current KPIs	Updated KPIs
Percentage of employees in positions needing to identify modern slavery risks having completed the modern slavery risks and/or due diligence training module.	 Percentage of all employees trained on general modern slavery risks; including percentage of employees having received additional training tailored to their position. Percentage of new hires trained on modern slavery risks within their first 45 days of employment.
Percentage of suppliers with annual spend above 10,000 (in local currency) identified as medium/high risk subjected to enhanced (i.e., questionnaires/consultation) due diligence.	 Percentage of high-risk Tier 1 suppliers subjected to enhanced due diligence, with 100% corrective actions implemented for identified non-compliance.
Number of corporate Tier 1 suppliers with annual spend above 50,000 (in local currency) assessed in relation to their own supplier engagement practices.	 Percentage of corporate Tier 1 suppliers with annual spend above 200,000 in local currency, assessed annually on their Tier 2 supplier engagement practices, with at least 80% demonstrating compliance with modern slavery mitigation expectations.
Number of modern slavery incidents or grievances reported through internal or external whistleblowing channels.	 Modern slavery grievances reported annually, 100% investigated and 90% resolved within six months. Feedback from employees in relation to grievance mechanisms, as obtained via annual surveys.





Consultation and engagement

In 2024, direct engagement on human rights with our businesses was limited, as they operate under their own established frameworks. However prior to its publication, this Statement was reviewed by each of the entities covered or mentioned. As part of our broader shift in approach, we recognise the need to deepen engagement - not just at the management level, but also with staff across our operations. Moving forward, we aim to exchange ideas, share experiences, and strengthen collective awareness of human rights risks and best practices across the businesses.

Collaboration in 2024 was more externally focused, particularly through our participation in the UN Global Compact Network Australia (UNGCNA). These industry-wide discussions allowed us to benchmark our approach, to gain insights from peers, and to contribute to shaping better practices. Our involvement in the consultation with the UN Special Rapporteur on Contemporary Forms of Slavery further reinforced our commitment to staying at the forefront of evolving expectations and regulatory developments.

This evolving approach reflects our belief that protecting human rights is not just about strong governance framework - it's about engagement, dialogue, and continuous learning.

Approval

This Statement was approved by the Boards of Atlas Arteria Limited (ATLAX) and Atlas Arteria International Limited (ATLIX) in their capacity as the principal governing bodies of Atlas Arteria on 13 June 2025.

Hugh Wellby

Hugh Wehby CEO and Managing Director Atlas Arteria Limited



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