



# Supplier Code of Conduct

(Management Policy)

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

# Supplier Code of Conduct

## 1. Purpose

This Code sets out the standards to which we will hold Suppliers accountable.

## 2. Application and Scope

This Code applies to all of Atlas Arteria's Suppliers.

Suppliers are subject to and must comply with the requirements and, where applicable, the obligations set out in this Code as well as complying with all applicable laws.

## 3. Policy

### 1. Compliance with STEER Values

Atlas Arteria requires Suppliers to uphold its STEER values – Safety, Transparency, Engagement, Environmental and social responsibility, and Respect – when interacting with or acting on behalf of, Atlas Arteria. Atlas Arteria's STEER values can be found on its website.

Atlas Arteria also expects Suppliers to require equivalent values and standards as set out in this Code of their own suppliers, agents, contractors and sub-contractors. Where Suppliers do not have their own Supplier Code of Conduct, we encourage them to incorporate reference to this Supplier Code of Conduct into their agreements with suppliers.

### 2. Due Diligence Obligations

Suppliers must assist Atlas Arteria to facilitate due diligence and any investigation into the Supplier's compliance with this Code, by responding promptly to any reasonable request by Atlas Arteria for information in relation to any matter referred to, or arising, in connection with this Code.

Suppliers acknowledge and agree to fully co-operate with any such reasonable request for information or investigation. This may include answering questionnaires, participating in interviews, or facilitating on site-visits.

Additionally, Suppliers must have appropriate due diligence arrangements and controls in place in relation to the third parties they engage for and on behalf of Atlas Arteria. Suppliers will share the

methodology and results of their own supply chain due diligence with us, on request.

### 3. Anti-Bribery and Corruption

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

Atlas Arteria expects its Suppliers to ensure that their activities and the activities of their suppliers for or on behalf of Atlas Arteria, are aligned with Atlas Arteria's Anti-Bribery and Corruption Policy, in particular:

- facilitation payments, even in jurisdictions where it is legally permissible, must not be made in connection with any goods or services supplied to or on behalf of Atlas Arteria.
- Suppliers must not give Atlas Arteria's staff gifts or entertainment at a time, in circumstances and/or of a value which may: (i) give rise to any perceived or actual conflict of interest; (ii) give the impression that it is intended to influence their decision; or (iii) amount to a bribe. Additionally, Suppliers must not give and/or accept gifts or entertainment from another third party in connection with work the Supplier is performing for Atlas Arteria that would offend these principles.

### 4. Sanctions

Suppliers must comply with all applicable international trade sanctions or controls, including any sanctions or embargoes implemented by Australia, the European Union and/or the United States.

Suppliers must not engage in any activities associated with or linked to terrorist organisations (as recognised by Australia, the European Union or the United States), narcotics traffickers, proliferators of weapons of mass destruction and organisations engaging or supporting such activities.

### 5. Anti-Money Laundering and Counter-Terrorism Financing

Atlas Arteria is committed to taking all reasonable steps to ensure that it does not contribute to or

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perpetuate money laundering and terrorist financing. Suppliers must not engage in such activities and must take reasonable steps, including performing robust due diligence, to ensure that their own suppliers and supply chains have no links to or involvement in any money laundering or terrorist financing.

### 6. Diversity and Inclusion

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

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

### 7. Health and Safety

Suppliers must comply with all applicable health and safety laws and aim to create a safe working environment for their employees, contractors, sub-contractors and anyone else affected by their businesses. In particular, all Suppliers are expected to have in place appropriate measures to ensure that their workplaces are free from bullying, harassment (including sexual and sex-based harassment) and discrimination.

All Suppliers must maintain appropriate public indemnity insurance when performing services for Atlas Arteria.

Any Supplier who attends Atlas Arteria's offices or worksites must while on site comply with Atlas Arteria's Code of Conduct Workplace Health and Safety Policy and Appropriate Workplace Behaviours Policy.

### 8. Human Rights, Employment Practices & Modern Slavery

Atlas Arteria is committed to ensuring that it does not contribute to, nor inadvertently support, modern slavery or violations of human rights.

Suppliers must take reasonable steps and implement appropriate measures to ensure that they and their own suppliers comply with all applicable laws in relation to:

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

Suppliers must be vigilant for any sign of and, ensure that they do not engage in or tolerate, modern slavery of any kind in their own business operations or in their supply chains. This includes any form of servitude, human trafficking, forced labour, child labour, debt bondage or other deceptive recruiting tactics for labour or services and any kind of illegal, abusive or exploitative labour, or work which is likely to harm the health, safety or morals of anyone employed, including children.

Atlas Arteria will give preference to suppliers who are transparent about their efforts to eradicate modern slavery and that demonstrate a commitment to human rights and employment practices in accordance with the UN Universal Declaration of Human Rights and the core conventions of the International Labour Organisation.

### 9. Confidentiality, Privacy & Cyber Security

Suppliers must comply with all privacy and data security laws applicable to the work for which they are engaged by Atlas Arteria, in particular Suppliers must collect, use and handle personal information in accordance with the *Privacy Act 1988* (Cth) and the U.K/E.U GDPR.

Suppliers must only use confidential and personal information for the purpose for which it was obtained or for an otherwise authorised purpose. To the extent permitted by law, our Suppliers must delete all confidential or personal information they have collected from us or on behalf of us at the earlier of our request to do so, or otherwise not more than 2 months after the provision of the services to which the data was relevant is complete (unless otherwise agreed in writing between the parties).

Suppliers must maintain the confidentiality of all information related to their work with Atlas Arteria and take reasonable steps to protect any confidential or personal information collected from or on behalf of Atlas Arteria. This includes keeping

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confidential and personal information secure and to prevent misuse, interference and inadvertent or unauthorised disclosure, access or modification through the implementation of best practice technical and information technology security solutions.

### 10. Fair Competition

Suppliers must comply with all laws concerning fair market practices and support the principles of fair competition in their business dealings with Atlas Arteria.

Suppliers must not engage in any form of anti-competitive conduct (which is conduct that is unlawful or otherwise restricted or prohibited under any applicable competition or anti-trust law) in its dealings or association with Atlas Arteria and must report any suspected, attempted or actual behaviour of this nature in accordance with Atlas Arteria's Whistleblower Policy.

### 11. Sustainability

Suppliers must comply with all applicable environmental laws and continually strive to improve their sustainability performance, focusing on reduction (as appropriate) of carbon emissions, water and natural resources consumption and waste. Atlas Arteria will give preference to suppliers that demonstrate commitments in these areas.

Atlas Arteria will also give preference to suppliers who are transparent about their efforts to comply with or otherwise demonstrate commitments towards applicable environmental and sustainability reporting standards.

## 4. Reporting

Suppliers must report any suspected or actual misconduct or breach of this Code to an Atlas Arteria Whistleblower Protection Officer in accordance with Atlas Arteria's Whistleblower Policy.

While all of the channels described in our Whistleblower Policy are open to Suppliers for making reports, we suggest that reports in relation to this Code be made to one of the Whistleblower Protection Officers listed below:

- Clayton McCormack, Group Executive Legal, Risk and Governance  
Email: [cmccormack@atlasarteria.com](mailto:cmccormack@atlasarteria.com)

- Vincent Portal-Barrault, Group Executive Europe, Strategy and Portfolio  
Email: [vportal@atlasarteria.com](mailto:vportal@atlasarteria.com)
- Catherine Brain, Group Executive, People & Culture  
Email: [cbrain@atlasarteria.com](mailto:cbrain@atlasarteria.com)

Reports may also be posted to c/- Level 1, 180 Flinders Street, Melbourne VIC 3000 (marked to the attention of one of the Whistleblower Protection Officers).

In the event a Supplier wishes to make a report to an external provider or generally make a report on an anonymous basis, Atlas Arteria's external "FairCall" service (operated by KPMG) may be used. Further details can be found online at <https://www.kpmgfaircall.kpmg.com.au/Atlasarteria> or in the Whistleblower Policy.

Subject to receipt of sufficient information, a matter reported will be investigated and conducted in a manner that is confidential, fair and objective pursuant to Atlas Arteria's Whistleblower Policy and applicable laws.

Atlas Arteria will to the fullest extent required by law, protect the identity of anyone making a report unless the discloser has consented to the disclosure of their identity. Atlas Arteria has systems in place to protect any discloser from detrimental acts or omissions arising because they made a report under the Whistleblower Policy.

Please refer to Atlas Arteria's Whistleblower Policy for further information.

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

## 5. Breaches of this Code

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

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### 6. Review

This Code will be reviewed every two years or as otherwise required in response to changes in applicable laws. Any material amendments to this Code will be reviewed and approved by Atlas Arteria's Executive Team. This Code may be updated by us without prior notice.

### 7. Related Documents

For the purposes of this Code, Suppliers accept that they will comply with the following policies (available on Atlas Arteria's website - <https://www.atlasarteria.com/>):

- Anti-Bribery and Corruption Policy;
- Diversity & Inclusion Policy;
- Environmental and Social Responsibility Policy;
- Vision and Values Statement;
- Human Rights Commitment Statement;
- Workplace Health and Safety Policy; and
- Whistleblower Policy.

### 8. Contacts

If you require assistance or guidance in relation to this Policy, please contact Atlas Arteria's Group Executive Legal, Risk and Governance.

### 9. Definitions

For the purposes of this Code:

- **Atlas Arteria** means Atlas Arteria Limited ACN 141 075 201, Atlas Arteria International Limited Registration No 43828 and each of their controlled subsidiaries.
- **Code** means this Supplier Code of Conduct.
- **Suppliers** means all suppliers, contractors, consultants, service providers or other third parties engaged by Atlas Arteria, or engaged on behalf of Atlas Arteria, to perform services or provide goods.