

STATEMENT ON MODERN SLAVERY

Introduction

This statement is made by GIP ATLAS Holdings Limited (“GIP ATLAS”) on behalf of itself and relevant group subsidiaries that are subject to the requirements of section 54 of the UK Modern Slavery Act 2015 (the “Act”) or the Modern Slavery Act 2018 (Cth) (the “Commonwealth Act”) in respect of the financial year ended 30 June 2022.

The operating entity subsidiaries are:

- ATLAS Infrastructure Partners (UK) Ltd. (“ATLAS UK”); and
- ATLAS Infrastructure (Australia) Pty Ltd (“ATLAS Australia”); (together “ATLAS Infrastructure”).

Our majority shareholder is GIM ATLAS LLC, a company based in the USA and owned by the founding partners of Global Infrastructure Partners (GIP) which is headquartered in New York, USA. In this statement, references to “GIP” mean Global Infrastructure Partners and its subsidiaries, and affiliates and references to “we”, “our” or “us” mean the entities making this statement. This statement sets out the steps taken to mitigate the risk of modern slavery and human trafficking taking place within any part of our business and our supply chains.

Modern Slavery

We recognise that human trafficking and other forms of modern slavery are a large but often hidden problem, and that modern slavery can take many forms, including forced labour, child labour, domestic servitude, sex trafficking and human trafficking.

We acknowledge our responsibilities and the responsibilities that our clients may have in respect of the Act and the Commonwealth Act and the prevention of modern slavery and human trafficking. In addition, we take steps to seek to ensure transparency within our organisation and with our suppliers of goods and services in relation to the prevention of modern slavery and human trafficking.

Our business

ATLAS Infrastructure consists of two private limited companies which provide specialist listed infrastructure investment management services to investor clients globally. Our clients include pension funds, sovereign wealth funds, wealth managers, and family offices.

As part of its regular research and due diligence processes ATLAS Infrastructure frequently interacts with companies in which it invests or in which it may invest. In its meetings with company management teams, ATLAS Infrastructure investigates companies’ approach to environmental, social and governance issues, including issues or risks associated with modern slavery. In addition, ATLAS uses a number of external services to stay abreast of ESG issues, including issues associated with modern slavery, across its investable universe.

All ATLAS Infrastructure employees received specialised training on the subject in October 2022 and will be provided with ongoing training where necessary.

Due to the nature of the companies in which ATLAS Infrastructure invests, that is listed companies which generally operate in highly regulated industries in OECD countries, the majority of our investee companies are not considered to be at high risk of exposure to human trafficking or slavery.

Supply Chains

We contract with a number of direct and indirect suppliers of goods and services, including suppliers of IT, office equipment and cleaning services, as well as professional services from lawyers, accountants and other advisers and consultants. We also contract for services required to support staff in our various offices and have agreements in place with third party payroll providers, pension fund managers, providers of private healthcare, employee benefits and other associated services required to support our employees. In addition, ATLAS Infrastructure contracts with a number of financial services firms in relation to the distribution of its investment products and the provision of its services.

Due to the nature of the goods and services supplied, the majority of suppliers in our supply chain are not located in countries or sectors that are considered to be at high risk of exposure to human trafficking or slavery.

Policies in Relation to Modern Slavery and Human Trafficking

We are committed to ensuring that none of our members of staff and none of the vendors they contract with, have any involvement in human trafficking and modern slavery. This commitment reflects our core values of teamwork, mutual respect, operational and investment excellence, and clients focus.

This approach is supported by our Anti-Bribery Policy, which outlines the principles that ATLAS Infrastructure follows to achieve zero-tolerance against bribery and corruption, as well as our Code of Ethics and Business Conduct which requires our staff to uphold the highest level of ethical conduct in their day-to-day business. These policies are set out in ATLAS Infrastructure's Compliance Manual and Compliance Policies & Procedures Manual.

Additionally, our employee policies further reflect our commitment to acting ethically and with integrity in all our business relationships. We also have whistleblowing procedures in place to encourage the reporting of unethical or illegal conduct.

Through ATLAS Australia, ATLAS Infrastructure has applied to become a member of Investors Against Slavery and Trafficking, Asia Pacific ("IAST APAC").

Due Diligence

ATLAS Infrastructure's base salary levels and overall compensation levels and benefits are set with reference to appropriate market benchmarking data (third party industry surveys), which are regularly reviewed. All salary payments are made directly to each employee's personal bank account.

Vendors

All direct vendors that we use, many of which are financial and professional services organisations which are themselves subject to strict regulation, are considered to be at a low risk of exposure to human trafficking and modern slavery. We endeavour to include appropriate terms in our contracts to ensure vendor compliance with the Act. All key staff involved in recruitment and vendor sourcing are made aware of our policy.

Supplier adherence to our values and our assessment of risk

We have a zero-tolerance approach to modern slavery and human trafficking. Those in our supply chain and our contractors are required to comply with these values. Given the nature of the services that we offer, we consider that the risk of modern slavery or human trafficking in our business and its supply chain is low.

Training

To seek to ensure all our staff uphold the highest level of ethical conduct in their day-to-day business, we offer mandatory training in Anti-Money Laundering and Anti-Corruption to employees.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 30 June 2022. The board of directors of the GIP ATLAS, as well as the board of directors of ATLAS UK and ATLAS Australia, have reviewed and approved this statement in October 2022.

The boards of each ATLAS Infrastructure entity have authorised GIP ATLAS to sign and issue this statement on their behalf and, accordingly, Charles Kirwan-Taylor has signed this statement for and on behalf of GIP ATLAS, for itself and for ATLAS Infrastructure.