



Modern Slavery and Human Trafficking Statement

May 29, 2024

ATS Traffic Ltd is a Canadian Traffic Safety company based out of Edmonton, Alberta. Operating since 1966, ATS Traffic helps organizations and communities keep workers, motorists, and pedestrians safe on our roads. With 9 locations across Canada and over 15,000 products in our inventory, ATS Traffic designs and implements customized safety solutions for traffic control, on-street services, and work zones for specific industries and project scopes. As a 3M™ Authorized Fabricator and Certified Digital Fabricator, ATS Traffic is Canada's leading sign and barricade manufacturer as well as an award-winning provider of installation services, consulting, procurement and logistics, asset management, ITS solution architecture, and drafting and design services.

At ATS Traffic Ltd, we take pride in embodying our core values, prioritizing integrity, and ethical standards across our entire organization. Our commitment to combatting forced and child labor within our business and supply chains aligns with the Canadian 'Fighting Against Forced Labor and Child Labour in Supply Chains Act.' This statement encompasses all activities undertaken up to March 31, 2024, and outlines our planned initiatives for the subsequent 12-month period.

At ATS Traffic Ltd, we recognize the paramount importance of upholding stringent ethical standards not just within our own operations, but also across our supply chain. We acknowledge our responsibility in ensuring compliance with these standards throughout our network. Consequently, we maintain rigorous expectations for our supply chain partners, expecting them to operate with integrity, uphold responsible business practices, and demonstrate unwavering commitment to social responsibility in their treatment of individuals and the environment.

Moreover, we recognize our duty to ensure that our suppliers uphold human rights, prevent any violations, and actively combat forced and child labor. To uphold these commitments, ATS Traffic Ltd intends to implement the following initiatives as part of our ongoing efforts to eradicate forced labor and child labor within both our operations and supply chains.

Area	Activities
Updating Employee Code of Conduct	<ul style="list-style-type: none"> • Clearly articulate our firm stance against forced labor and child labor, emphasizing our commitment to eradicating these practices throughout our operations and supply chains. • Reinforcing our whistleblower program to empower employees to confidentially report any concerns within our organization or through our supply chain network related to forced labor or child labor. We ensure protection against retaliation for individuals who come forward with information. • Ensure annual review / training of Code of Conduct is completed by all employees on an annual basis.
Supplier Code of Conduct	<ul style="list-style-type: none"> • Instituting a policy that clearly outlines our expectations for ethical and responsible behavior, establishing firm standards for conduct that includes upholding fundamental labor and human rights principles. <ul style="list-style-type: none"> ○ Implementation of a signed agreement by suppliers, affirming their commitment to comply with our Supplier Code of Conduct Policy, which emphasizes ethical practices and adherence to labor and human rights standards. ○ High priority placed on suppliers whose goods originate or are manufactured outside of North America ○ Development & Training of newly established Policy
Importation of Goods from High-Risk Regions	<ul style="list-style-type: none"> • Conduct a preliminary assessment of all imported goods to evaluate the likelihood of forced labor and/or child labor. • Utilize the results of this assessment to identify high-risk suppliers and products, particularly those originating from geographical locations highlighted in the Fighting Against Forced Labor and Child Labor in Supply Chains Act.
Annual Review of High-Risk Suppliers & Supply Chains	<ul style="list-style-type: none"> • Conduct an annual review of all suppliers to identify high-risk vendors, which includes those demonstrating non-compliance with our Code of Conduct or identified through other risk assessment measures. • Perform onsite audits for the top 25% of suppliers classified as high-risk, allowing us to directly assess their operations and practices

In addition to these initiatives, ATS Traffic Ltd is committed to upholding our core values across our organization, community, and supply chain networks. We remain dedicated to fostering strong engagement and adherence to our values through regular training sessions, business update meetings, and educational opportunities, ensuring continuous communication throughout our entire organization.


Approval

This statement has been approved by the Board of Directors of ATS Traffic Ltd. The Board of Directors of Cleo Holdings Ltd. (the 100% Shareholder of the voting shares of ATS Traffic Ltd.).

Conclusion

ATS Traffic Ltd. Remains committed to preventing slavery and human trafficking from taking place in its business and within our supply chain. We will continue to review our policies, procedures, and practices periodically to determine if there are any improvements that we can make to help prevent modern slavery and human trafficking.

Signed by

 May 29, 2024

Bobby Cantera
Chief Executive Officer