
Fighting Modern Slavery

2024 Report
Canada

February 27, 2025

About this report

Across the ATCO group of companies, we have the privilege of serving millions of people in hundreds of communities, delivering the essential services that underpin their health, prosperity, and sustainability. The magnitude of this duty is not lost on us, and we embrace it with care and determination.

From this unique vantage, we are keenly aware of the profound responsibility we bear—not only to provide essential services but to uphold the fundamental principles of human rights in every action we take. Human rights, at their core, are the bedrock upon which our societies are built. They ensure the dignity, freedom, and equality of every individual, regardless of their background or circumstance. As providers of essential services—energy, housing, security, and more—we have a unique role in safeguarding these rights, as our services touch the very essence of modern daily life.

[ATCO's Code of Ethics](#) embodies our unwavering commitment to fostering respect for internationally recognized human rights. Our values of integrity, safety, agility, collaboration, and caring direct the conduct of every individual within the global ATCO team. We also strive to collaborate with business and community partners who share these values and appreciate their fundamental importance to our identity and purpose.

ATCO's approach to human rights is based on the United Nations (UN) Universal Declaration of Human Rights and we respect human rights in accordance with the UN Guiding Principles on Business and Human Rights. We prohibit all forms of forced labour and child labour (hereafter referred to as Modern Slavery) within our operated business activities—inclusive of our supply chain, vendors, and partners.

I am pleased to present ATCO's 2024 Report: Fighting Modern Slavery, which demonstrates our commitment to taking action to positively impact our supply chains and other business partnerships. This Report documents the steps taken within ATCO throughout 2024 to prevent and reduce the risk of Modern Slavery at any step of the production of goods in Canada or elsewhere by ATCO, or of goods imported into Canada by ATCO.

This Report has been prepared in accordance with requirements set out in Part 2 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, SC 2023, c 9 (the Act). It is a joint report prepared on behalf of and approved by the Board of Directors of ATCO Ltd. pursuant to section 11(4)(b)(ii) of the Act. This Report includes the entities listed in the Appendix (collectively, ATCO or Reporting Entities).

In accordance with the requirements of the Act, and in particular section 11 thereof, I, in the capacity of Chair and CEO of ATCO Ltd., attest that I have reviewed the information contained in this Report on behalf of the governing body of ATCO Ltd., which, pursuant to section 10(2) of the Act, is deemed to control each of the Reporting Entities listed in the Appendix. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed within this Report. I have the authority to bind ATCO Ltd.

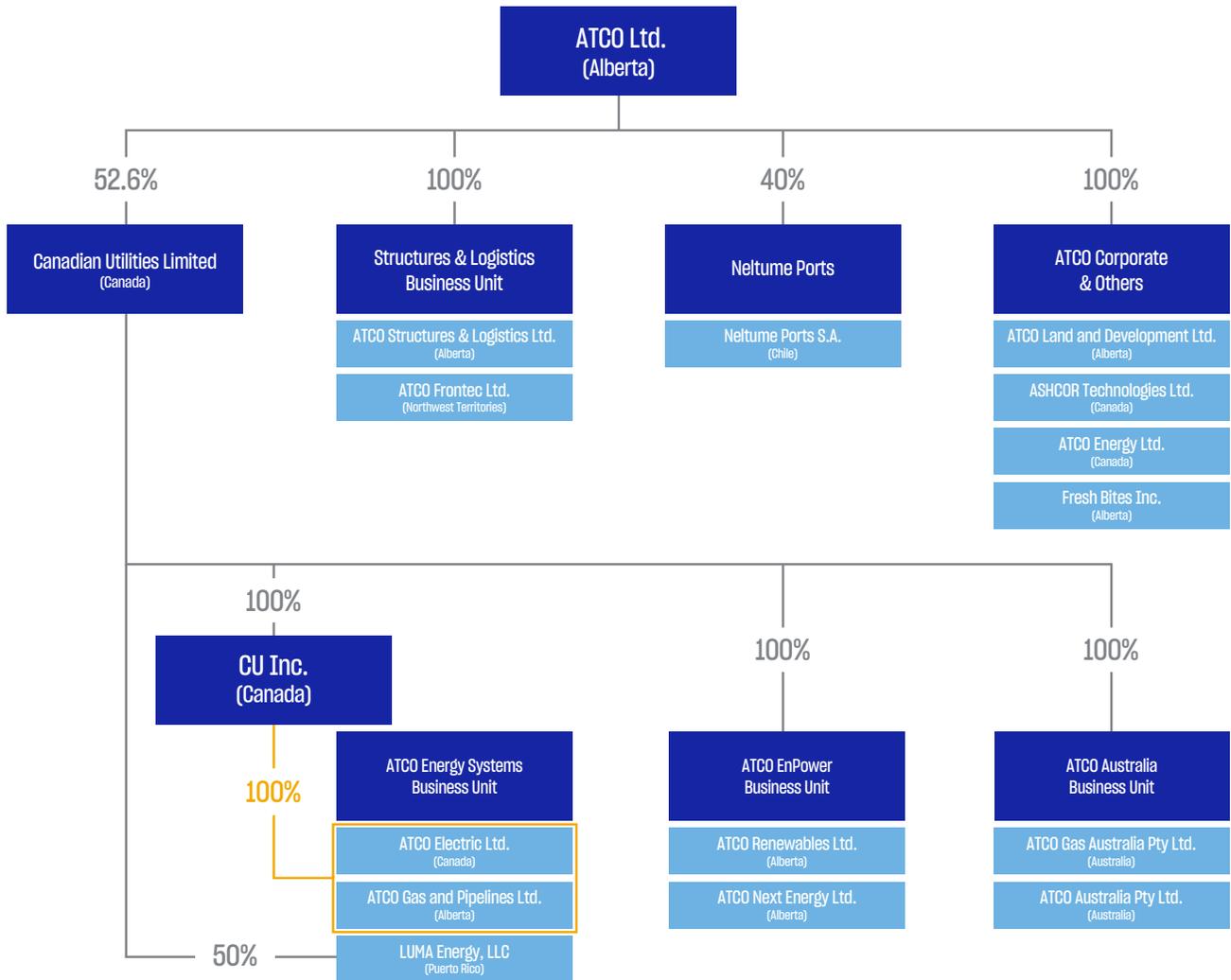
February 27, 2025



Nancy C. Southern
Chair & CEO, ATCO Ltd.

Our structure, activities & supply chain

Figure 1: Global corporate structure¹



(1) This report includes the Reporting Entities listed in the Appendix.

Activities

As a global enterprise, ATCO Ltd. and its subsidiary and affiliate companies have approximately 21,000 employees and assets of \$27 billion. ATCO is committed to future prosperity by working to meet the world's essential energy, housing, security and transportation challenges. ATCO Structures designs, builds and delivers products to service the essential need for housing and shelter around the globe. ATCO Frontec provides operational support services to government, defence and commercial clients. ATCO Energy Systems delivers essential energy for an evolving world through its electricity and natural gas transmission and distribution,

and international electricity operations. ATCO EnPower creates sustainable energy solutions in the areas of electricity generation, energy storage, industrial water and cleaner fuels. ATCO Australia develops, builds, owns and operates energy and infrastructure assets. ATCOenergy and Rumi provide retail electricity and natural gas services, home maintenance services and professional home advice that bring exceptional comfort, peace of mind and freedom to homeowners and customers. ATCO also has investments in ports and transportation logistics, the processing and marketing of ash, retail food services and commercial real estate. Data on ATCO Ltd.'s global business is provided in the Figures below.

Figure 2: Current operations & investments



Figure 3: ATCO's 2024 global business data

\$27B

IN ASSETS

\$4.9B

IN REVENUES

4M+

GLOBAL CUSTOMERS

544,000M³

NATURAL GAS LIQUIDS CAPACITY

66,000KM

NATURAL GAS PIPELINES

12

MODULAR BUILDING MANUFACTURING FACILITIES

106,000KM

ELECTRIC POWERLINES

18/5

PORT FACILITIES/ OPERATION SERVICES

\$1.8B

CAPITAL EXPENDITURES

21,000

EMPLOYEES

85,200M³/Day

WATER INFRASTRUCTURE CAPACITY

117PJ

NATURAL GAS STORAGE CAPACITY

27,600

RENTAL FLEET UNITS

771MW

POWER GENERATION OPERATED

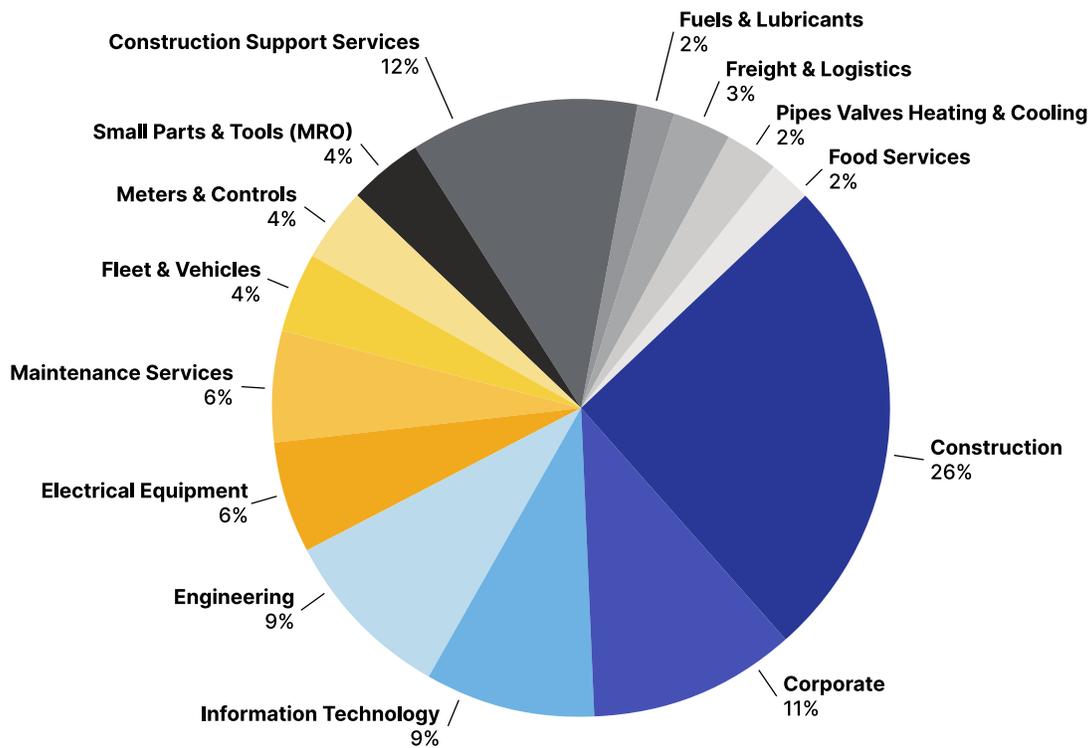
Supply chain

ATCO's² supply chain is the network between the company and its trusted vendors—including third-party contractors, preferred vendors, service providers, distributors, consultants, transportation companies, and producers—to deliver essential services to our customers. With diverse operations across multiple industries, the procurement of goods and

services to support ATCO's strategic objectives is managed by a variety of teams and functions across our businesses, depending on the specific business need. In 2024, ATCO's collective vendor base totaled approximately 27,000 individual entities, organized into distinct categories of goods and services procured as shown in Figure 4.

(2) While Figures 1, 2 and 3 show all current ATCO Ltd. operations and investments, the information that follows in this Modern Slavery report reflects procurement conducted by the Reporting Entities listed in the Appendix.

Figure 4: ATCO's 2024 procurement by category³



(3) Percentages may add to more than 100 per cent due to rounding.

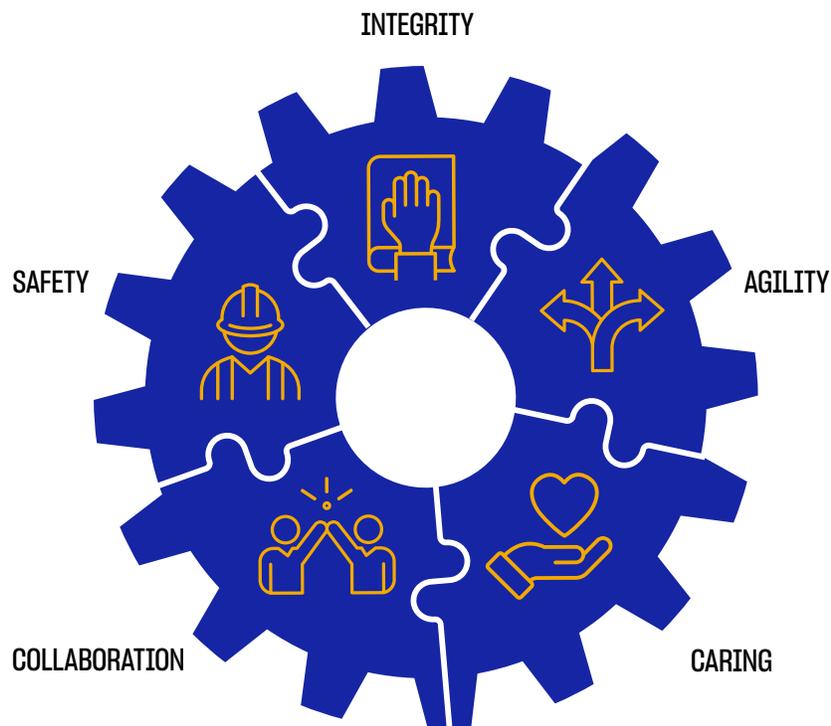
Our values, policies & due diligence

Our values

ATCO is a provider of essential products and services. With this comes a responsibility to ensure those products and services are safe, reliable, sustainable and affordable.

Our actions reflect our core values of safety, integrity, agility, collaboration and caring. Based on these core values, our Code of Ethics: How We Do Business sets out the behaviours and standards of conduct we expect of ourselves and each other. Suppliers, joint venture partners and agents working with us are expected to adhere to equivalent ethical standards.

Figure 5: Our values



Policies

ATCO communicates its expectations regarding Modern Slavery through the following documents:

- **Code of Ethics: How we do business, living the ATCO values**, or the ATCO Code of Ethics refers specifically to the different forms of Modern Slavery, including forced and child labour, and explicitly prohibits the use of Modern Slavery within any ATCO business activities. Use of third parties engaging in any type of Modern Slavery is also prohibited.
- **Speaking Up Policy:** This policy provides all ATCO employees with a confidential venue to speak out, ask questions, and express concerns if they encounter a scenario that breaches the ATCO Code of Ethics, or that signals unethical behaviour. This policy includes Modern Slavery on the list of items that must be reported for investigation and remediation and prohibits retaliation for individuals making good faith reports.
- **ATCO's Vendor Conduct Requirements (VCR)** set forth our expectations and standards for vendors who provide goods or services to ATCO Ltd. or its affiliates. It requires vendors to treat their workforce fairly, comply with all applicable labour and employment laws, and prohibit any involvement in Modern Slavery practices. It is incorporated by reference in standard procurement vendor contracts. Vendors are expected to comply fully with these requirements and to cooperate with ATCO in any compliance verification processes. Non-compliance may result in termination of the commercial relationship.
- **Purchasing Policy:** In 2024, ATCO implemented changes to its Purchasing Policy to strengthen its commitment to addressing Modern Slavery. The ATCO Purchasing Policy applies to and binds all directors, officers, and employees involved in procurement processes. It now includes references to ATCO's processes and policies for assessing and addressing the risk of Modern Slavery within its businesses and supply chains.
- **ATCO Procurement Manual:** This Manual is a consolidated set of procedures, roles and responsibilities, and business and technology system processes that guide how ATCO manages the end-to-end procurement or purchasing of its third-party goods and services. ATCO undertook revisions to its Procurement Manual in 2024. These updates addressed stakeholder feedback and emerging global concerns, particularly those related to Modern Slavery. The revised Manual includes:
 - Enhanced guidelines on legal and ethical procurement practices.
 - Improved vendor due diligence reporting and processes, emphasizing compliance with labour and human rights standards.
 - Updated procedures for monitoring and verifying vendor compliance through audits and assessments.

In addition to, and in conjunction with, the above updates, training is provided on an ongoing basis to the procurement teams to identify and mitigate risks related to Modern Slavery.

Due diligence

In 2024, ATCO implemented a vendor risk management (VRM) platform to enable ongoing vendor due diligence and evaluation. This platform provides data on vendor risks, including Modern Slavery, financial, environmental, legal or regulatory sanctions, corruption and other critical supply chain risks. For 2024, the platform has enabled ATCO to review all vendors that it did business with in 2024 and to assess which vendors were potentially high risk and required additional investigation to determine whether any additional mitigation measures were necessary. The results of this review are discussed further below.

In addition to internal policies and practices, ATCO also expanded its electronic Vendor Onboarding Process to enhance ATCO's ability to:

- Capture greater detail on each active vendor's corporate structure (including ATCO affiliate or joint venture relationships); and
- Require the vendors' electronic confirmation that it has read and agreed to ATCO's VCR.

Risks of Modern Slavery in ATCO's operations and supply chain

Modern Slavery & our operations

ATCO conducts a large portion of its business and operations in Canada and the United States. Accordingly, its business operations are assessed as lower risk for Modern Slavery, based on the locations of labour resources and customers entirely within Canada and the United States and given adherence to the legal, regulatory, and market practice frameworks in place within both countries. While Modern Slavery can impact any population, we recognize certain groups are particularly vulnerable, including:

- Domestic and foreign migrant workers.
- Contract, agency, and temporary workers.
- Refugees, asylum seekers, ethnic/religious minorities, and displaced persons.
- Young or student workers.

As noted above, ATCO policies prohibit Modern Slavery within its operations and encourage reporting of any violations for investigation and remediation. No instances of Modern Slavery in ATCO's operations have been identified in 2024.

Modern Slavery & our supply chain

As noted above, ATCO has a large vendor population. Upon assessing its category or commodity risk as it relates to Modern Slavery, ATCO finds:

- **Moderate Risk** for some service categories, such as unskilled labour, information technology and other offshore support services, and professional services such as legal and audit services.
- **Higher Risk** in the materials and equipment area of our supply chains, considering global commodity sourcing, and manufacturing and logistics (including maritime transport) from overseas countries. As per the [US Government 2024 List of Goods Produced by Child Labor or Forced Labor](#), the majority of these high-risk goods include raw goods: produce, cotton, and rubber. Any procurement of these raw goods is minimal and done through distributors in a manufactured form. As noted in ATCO's 2023 Modern Slavery Report, solar panel components from China are also considered high risk. While ATCO did procure solar panels for its operations in 2024, all solar panels were purchased with Canadian-based vendors.

In 2024, ATCO used its newly implemented VRM platform to review its direct (also known as Tier 1) vendors for Modern Slavery risks. The platform allowed assessment of ATCO's total vendor base of 27,000 vendors, including identifying vendors that have international operations in higher-risk jurisdictions. The result is a more comprehensive assessment of ATCO's vendor base than in 2023, when ATCO was only able to assess those vendors representing the top 80 per cent of spend.

The following steps were considered and taken in order to conduct ATCO's Modern Slavery Risk assessment:

- The VRM platform provides visibility to all goods and / or services provided to ATCO by its vendor base in addition to the jurisdictions from which they were procured.
 - As such, the VRM platform initially identified:
 - 1331 Potentially High-Risk (PHR) vendors
 - >25,000 Low or No Risk vendors
- The PHR rating identifies vendors that have operations both in low-risk jurisdictions as well as jurisdictions where Modern Slavery and other human rights issues are more prevalent.
- Upon review of the 1331 PHR vendors, it was determined that:
 - 6 vendors had a high Modern Slavery risk based on jurisdictional operations (e.g. Mexico, India, China, and Philippines) providing goods or service to ATCO (information technology, electrical goods, and small parts & tools); and
 - 20 vendors had a moderate Modern Slavery risk based on jurisdictional operations. ATCO has only procured goods or services originating from the North American operations of those vendors.
 - Further analysis on the identified 6 High-Risk vendors determined that:
 - ATCO only conducted business with the North American operations;
 - Vendors had signed off on ATCO's VCR requirements; and / or
 - The vendor had its own Modern Slavery policies in place that met ATCO's VCR standards.

No instances of Modern Slavery within ATCO's vendor population were identified in 2024.

Remediation

Measures to remediate Modern Slavery

As noted above, no instances of Modern Slavery were identified in ATCO's business activities or with its vendors in 2024. As a result, no remediation measures were taken.

Measures to remediate the loss of income to vulnerable families

As no instances of Modern Slavery were identified by ATCO in 2024, no remediation measures related to loss of income to vulnerable families were taken.

Training

ATCO Code of Ethics: How we do business - living the ATCO values

Each year, ATCO delivers mandatory comprehensive Code of Ethics training in three languages — Spanish, French, and English — to members of the ATCO team around the world. This training contains specific content on Modern Slavery in order to raise awareness and competency on this topic. Each ATCO employee completing the training must attest that they have read, understood, and will govern themselves in accordance with the requirements outlined in the Code of Ethics. Employees that join the ATCO team outside of the annual training period are also required to complete the Code of Ethics training as part of mandatory onboarding activities.

Measuring our effectiveness

ATCO has established the following Key Performance Indicators (KPIs) to evaluate our progress and measure our program's effectiveness:

1. Number of potentially high-risk vendors requiring further assessment
2. Number of confirmed high risk vendors
3. Number of cases of Modern Slavery reported under the Speaking Up Policy
4. Number of vendors that ATCO has chosen not to do business with due to Modern Slavery concerns

Modern Slavery KPI	2024
Number of vendors requiring further assessment	1331
Number of confirmed high risk vendors	6
Number of cases of Modern Slavery reported under the Speaking Up Policy	0
Number of vendors that ATCO has chosen not to do business with due to Modern Slavery concerns	0

Appendix

Reporting entities

Below is a list of the ATCO entities⁴ covered by this report as of February 27, 2025⁵:

- ATCO Electric Ltd.
- The Yukon Electrical Company Limited
- ATCO Gas and Pipelines Ltd.
- ATCO Next Energy Ltd.
- ATCO Renewables Ltd.
- Forty Mile Granlea Wind Limited Partnership
- ATCO Structures & Logistics Ltd.
- Triple M Housing Ltd. (recently acquired)⁶
- ATCO Frontec Ltd.
- ATCO Ltd.
- Canadian Utilities
- CU Inc.
- ATCO Energy Ltd.
- NRB Limited (recently acquired)^{6,7}

(4) While Figures 1,2 and 3 show all current ATCO Ltd. operations and investments, this Modern Slavery report reflects these Reporting Entities.

(5) This report is for the fiscal year January 1, 2024 to December 31, 2024.

(6) The process to bring recently acquired entities into compliance with the policies and procedures noted in this report has been underway in 2024.

(7) NRB Limited was amalgamated with ATCO Structures & Logistics Ltd. on November 30, 2024.

Legal advisory

Forward-looking information

Certain statements contained in this Report constitute forward-looking information. ATCO believes the forward-looking information is reasonable based on the information that is available on the date of this Report and the processes used to prepare such information; however, such information is not a guarantee of future performance and no assurance can be given that the information will prove to be correct. Forward-looking information should not be unduly relied upon. Such information involves a variety of assumptions, known and unknown risks and uncertainties, and other factors, which may cause actual results, levels of activity, and achievements to differ materially from those anticipated by such forward-looking information. Actual results could differ materially from those anticipated in the forward-looking information as a result of a variety of risk factors, many of which are beyond the control of ATCO. Due to the interdependencies and correlation of these risk factors, the impact of any one material assumption or risk on a forward-looking statement cannot be determined with certainty. For additional information about the principal risks ATCO faces, see “Business Risks and Risk Management” in ATCO’s Management’s Discussion and Analysis for the year-ended December 31, 2024 (MD&A). The forward-looking information contained herein reflects Management’s expectations as of the date of this Report and is subject to change after such date. ATCO disclaims any intention or obligation to update or revise any forward-looking information whether as a result of new information, future events or otherwise, except as required by applicable securities legislation.

