

## MODERN SLAVERY ACT STATEMENT

This Modern Slavery Act statement ("Statement") is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 ("*Modern Slavery Act*") on behalf of Atlas Corp. and its subsidiaries (together, "Atlas") for the financial year end, September 30, 2025. This Statement complements Seaspan Corporation Pte. Ltd.'s annual Sustainability Report, which can be found on our corporate website ([www.seaspancorp.com](http://www.seaspancorp.com)).

### About Atlas Corp.

Atlas Corp. is a global asset management company and the parent company of Seaspan. Seaspan is a leading independent charter owner and operator of vessels providing integrated ship management services.

### Our Culture

Atlas is committed to conducting its business in an ethical and legal manner. The board of directors and executive leadership team seek to set a strong tone from the top throughout the organization to reinforce the importance of doing the right thing and acting with trust and integrity. Atlas supports a shared leadership approach in which integrity is embraced as a shared responsibility within the organization. We have a zero-tolerance approach to modern slavery issues and the remainder of this statement sets out the steps we take to implement this.

### Our Policies on Modern Slavery

Modern slavery, as used in this Statement, refers to any offense set forth in the UK *Modern Slavery Act* (and any other applicable legislation) including slavery, servitude, forced or compulsory labor, and human trafficking. Atlas takes a zero-tolerance approach towards any modern slavery in its supply chains. We benchmark our approach to dealing with modern slavery against best practice in our industries and all relevant international guidance including the UN Guiding Principles on Business and Human Rights. Our policies to prevent business ethics violations including in relation to modern slavery are summarized below:

Our *Standards of Business Conduct Policy* ("Standards"), which may be found in the Corporate Governance section of our corporate website, is the cornerstone of our business ethics program. The Standards are mandatory for all Atlas personnel and set out the rules of ethical conduct that Atlas personnel must follow. The Standards reinforce our zero-tolerance approach towards business ethics violations such as modern slavery and provide rules and guidance related to:

- performing risk-based due diligence to check the business ethics of our counterparties including their commitment to prevent modern slavery offences;
- including business ethics policy compliance in our contracts;
- reporting any suspected breach of our Standards including in relation to modern slavery;
- safeguarding the environment and promoting sustainability;
- preventing corruption, sanctions, trade control and proscribed person violations;
- keeping accurate financial records and maintaining effective internal controls;
- preventing fraud, money laundering and any facilitation of tax evasion;

- protecting privacy and confidentiality; and
- avoiding conflict of interests and unauthorized political contributions.

The Standards are reviewed regularly and changes are implemented business-wide through appropriate communications and training.

### **Our Due Diligence Methodology**

Atlas has implemented a due diligence procedure that requires Atlas personnel to check and “onboard” those third parties that might reasonably present a compliance risk to Atlas. Entities/persons that are provisionally assessed as a higher risk are subject to further evaluations, which may include due diligence questionnaires, interviews, certifications or external due diligence reports. Atlas personnel must obtain legal department approval before proceeding with these transactions. Strategic and long-term supply chain relationships are subject to periodic review of risk and repeat evaluations.

In requiring compliance to our Standards, Atlas requires its suppliers and service providers to take appropriate steps to prevent modern slavery in their respective supply chains and strictly refrain from abusive labor practices in violation of the *Modern Slavery Act*.

### **Our Risk Management, Measurement and Monitoring**

Atlas observes all applicable laws and regulations including those requirements specified in the *Modern Slavery Act* and the *Sarbanes-Oxley Act of 2002*. Atlas implements all required internal controls and conducts regular internal audits to assess and monitor its business ethics compliance.

Atlas recognizes that regular risk assessments are an important component of an effective compliance program. We conduct risk assessments to identify existing and emerging risks, which may originate internally or externally. Atlas uses these risk inputs to assess and prioritize its mitigation responses. Business ethics, including modern slavery considerations, are routinely considered as part of these risk assessments.

Atlas recognizes that certain geographic areas (e.g., jurisdictions that score poorly in the Global Slavery Index), certain activities (e.g., work involving migrant, casual or less skilled labor), and certain transaction types (e.g., shipyards, manning agents), amongst other issues, may present heightened risk potential for forced labor. Atlas adopts a risk-based approach to coordinate its due diligence, training and monitoring efforts so that resources are allocated proportionately to assessed risks.

### **Our Training and Communications**

Atlas provides multiple business ethics training sessions including annual ‘in-person’ (or online for remote personnel) Ethics and Compliance training (with a section covering modern slavery) for all shore-based personnel, video-based induction compliance training, and sign off on the Standards (with a section covering modern slavery) for new employees and bespoke compliance training for specific departments on an ad hoc basis. This training program is subject to regular review and update, with changes communicated to all staff.

### **Plans for the 2026 Financial Year**

During the course of the next financial year, we plan to further develop and strengthen our modern slavery policies, training, and reporting. Some of the areas that we have identified for focus are:

- Continuing to refine our 3rd party diligence procedures and to expand independent identification

and verification of Modern Slavery Act risks.

- Deploying updated contracting process to ensure that we maintain and, where necessary, strengthen control and oversight of modern slavery risk in our key suppliers and partners.
- Ensuring that we have effective risk reviews and updating our systems to facilitate whistleblowing by all stakeholders including employees, customers and suppliers.

### **Reporting Concerns**

Atlas personnel are required to report business ethics violations (including any suspected modern slavery offences) to Legal or Internal Audit. Personnel may also, at their option, report any suspected business ethics violation including human rights violations and abusive labor practices under the *Modern Slavery Act* through an anonymous and/or confidential reporting page, the details of which are provided in the Standards of Business Conduct Policy and on its website.

### **Authority and Approval**

This Statement has been approved by the Board of Directors of Atlas Corp.