



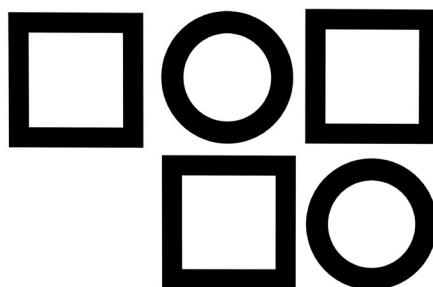
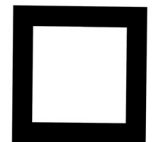
Modern Slavery Statement

FINANCIAL YEAR 2019-20



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ABOUT THIS STATEMENT

This Modern Slavery Statement is jointly made by the following entities within the **AirTrunk** Group:

AirTrunk Sydney Land Trust

ABN 89 561 908 089

AirTrunk Australia Holdings Trust

ABN 89 469 259 695

Andante Holding Trust

ABN 57 334 256 317

Together, these entities are referred to as **AirTrunk** (we, us, or our).

This statement is made in relation to the financial year commencing 1 July 2019 and ending 30 June 2020.

MESSAGE FROM THE CEO



AirTrunk is where the cloud meets the ground in the Asia-Pacific. We've reimagined the data centres of yesterday to meet the needs of today's most transformational companies to enable a data-driven future. Our customers are changing the way that people interact, transact and learn.

AirTrunk designs, builds, and operates the critical infrastructure that enables our customers to drive this transformational change. With such change, comes great responsibility. We are responsible for ensuring a sustainable future for our people, customers, communities and for generations to come.

AirTrunk recognises our company has a social, ethical and legal responsibility to ensure that our activities and those of our supply chain do not contribute in any way to the generation or spread of modern slavery.

AirTrunk provides a safe working environment where all staff, customers and contractors can thrive. We are committed to preventing acts of modern slavery and human trafficking and expect the same high standards from suppliers, business partners and contractors.

This statement, which addresses the financial year 2019-20, sets out the steps we have taken to address our responsibilities under the Modern Slavery Act 2018 (Cth), and how we will continue to meet our commitments.

**ROBIN KHUDA,
CHIEF EXECUTIVE OFFICER**

OUR BUSINESS

WHO WE ARE AND WHAT WE DO

AirTrunk is a best-in-class hyperscale data centre specialist creating a platform for cloud, content and large enterprise customers across the Asia-Pacific region. We develop and operate data centre campuses with industry leading reliability, technology innovation and energy efficiency.

Founded in Australia, we develop and operate hyperscale data centre campuses across the Asia-Pacific region, with business operations currently in Australia, Singapore, Hong Kong and Japan.



OUR BUSINESS

OUR SUPPLY CHAIN

AirTrunk engages with multiple suppliers and third-party business partners (including contractors). These suppliers and business partners are typically located in the countries in which we operate across the Asia-Pacific region.

Most of our procurement activities involve goods and services required to develop and construct data centres or the operation and maintenance of existing facilities. This includes:

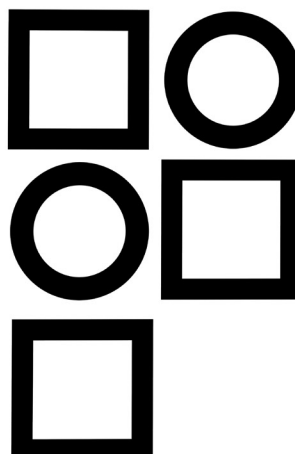
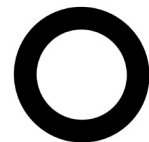
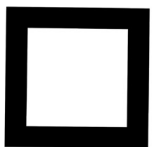
- Design and construction services
- Critical data centre plant and equipment
- Energy and utility services
- Data centre operational facility management services and security
- Information and communication services
- Other professional services.

The third-party businesses we engage (including contractors) provide a wide range of services including:

- Design and construction of data centres
- Provision of data centre equipment and materials
- Facilities management
- Security.

The majority of our suppliers and third-party business partners are large national and global companies with established governance structures and their own corporate social responsibility programmes, including in relation to modern slavery. This affords AirTrunk some assurance in engaging in those commercial relationships.

Our commitment to social responsibility, the use of ethical labour, and the eradication of modern slavery is fundamental to our procurement decisions at every point in our supply chain. We have undertaken extensive risk identification and evaluation to inform the development of our *Modern Slavery Policy* and other actions we are taking to minimise the risk of modern slavery occurring in our operations or supply chains.



ADDRESSING MODERN SLAVERY

AirTrunk engaged an external adviser to undertake a risk identification program, assess our supply chain and provide recommendations for risk mitigation.

The assessment focused on procurement and employment operations as these were identified as the most likely aspects of our operations and supply chain to be vulnerable to modern slavery risks.

This process led to the development of our *Modern Slavery Policy*, which, in addition to our [Whistleblower Policy](#), forms the basis of our current framework. We are committed to ongoing risk management through consistent due diligence and mitigation to monitor for and avoid modern slavery in all environments in which we operate.

POLICIES

AirTrunk is engaged in ensuring a transparent working environment where our employees, contractors and other business partners can confidentially raise modern slavery concerns with AirTrunk.

Since the end of the 2019-20 reporting period, AirTrunk has developed its Modern Slavery Policy to reflect its commitment to acting ethically and with integrity in all business relationships and implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its supply chains.

Our [Whistleblower Policy](#) sets the framework under which employees, suppliers and third-party businesses we engage can report instances of modern slavery and other serious breaches and misconduct to AirTrunk without fear of reprisal.

RISK IDENTIFICATION

Based on our assessment, the countries in which we operate are considered a low risk for modern slavery. However, we appreciate and acknowledge that the Asia-Pacific region is generally deemed to have a higher risk profile.¹

The risk assessment identified the following risks in our supply chain.





RISK	
01.	AirTrunk does not always have visibility or approval rights over direct suppliers' sub-contracting arrangements, leaving us exposed to a higher level of modern slavery risk.
02.	AirTrunk has limited visibility regarding ICT procurement in relation to tier 2 equipment suppliers and other suppliers deeper in the supply chain, for example, where our general contractor procures ICT equipment from third party suppliers.
03.	AirTrunk's construction and manufacturing contracts for the construction of our data centres and the critical infrastructure and equipment exhibit comparatively higher modern slavery risks due to the vulnerabilities in those industries and, in some cases, the location of the activities.

¹ Walk Free Global Survey Index 2018

We did not identify any significant modern slavery risk in relation to the demographics of AirTrunk’s employees, who predominantly comprise highly skilled labour. All of AirTrunk’s employment contracts meet or exceed the applicable employment legislation in the countries in which AirTrunk operates. AirTrunk’s employees are subject to our ethical conduct policies. We recognise the importance of educating every employee across our supply chain on the risks of modern slavery and ways to prevent, identify and respond to it.

ACTIONS WE ARE UNDERTAKING

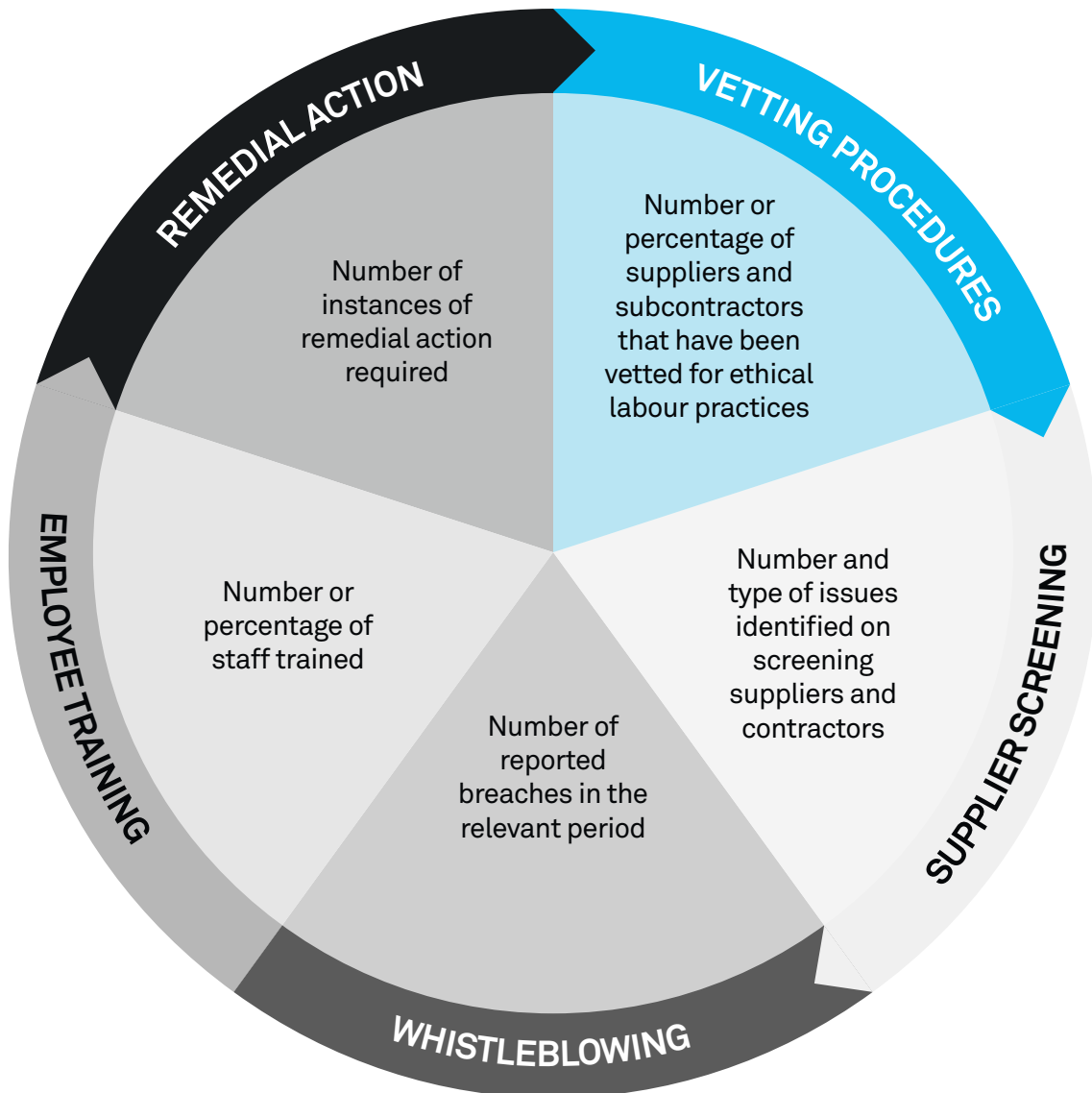
AirTrunk is undertaking the following activities to address our risk assessment outcomes and analysis, and combat the risk of modern slavery and human trafficking in our operations and supply chains.

FOCUS	ACTION
 <p>GOVERNANCE</p>	<ul style="list-style-type: none"> Develop and implement a modern slavery response strategy detailing AirTrunk’s approach to identifying and managing modern slavery risks.
 <p>SUPPLIERS & THIRD-PARTY BUSINESSES ENGAGEMENT</p>	<ul style="list-style-type: none"> Communicate AirTrunk’s commitment to compliance with modern slavery laws to suppliers and business partners, and our corresponding expectations for their conduct Include appropriate contractual obligations reinforcing supplier and business partners commitments and reporting requirements in relation to suspected modern slavery issues in their own operations Develop additional risk screening tools to enhance AirTrunk’s supplier due diligence and assessment processes.
 <p>RISK MONITORING</p>	<ul style="list-style-type: none"> Review modern slavery risk assessment to respond to changes to AirTrunk’s operations, structure or entry into new markets and other organisational factors.
 <p>EDUCATION AND AWARENESS</p>	<ul style="list-style-type: none"> Deliver modern slavery training sessions to AirTrunk’s employees to understand what modern slavery is, the steps that AirTrunk takes to minimise modern slavery risks and how employees can raise concerns.

MEASURING SUCCESS

KEY PERFORMANCE INDICATORS

To assess the effectiveness of its actions, AirTrunk will evaluate the following performance indicators annually.



CONSULTATION AND APPROVAL

In developing our Modern Slavery Statement, we engaged with key business areas responsible for procurement, risk and legal.

The Statement was approved on 17 February 2021 by the Board of Directors of the Trustee of each of the AirTrunk entities named in Section 1 of this Statement.

AirTrunk is dedicated to continuous improvement to address the challenging and complex issue of modern slavery.

