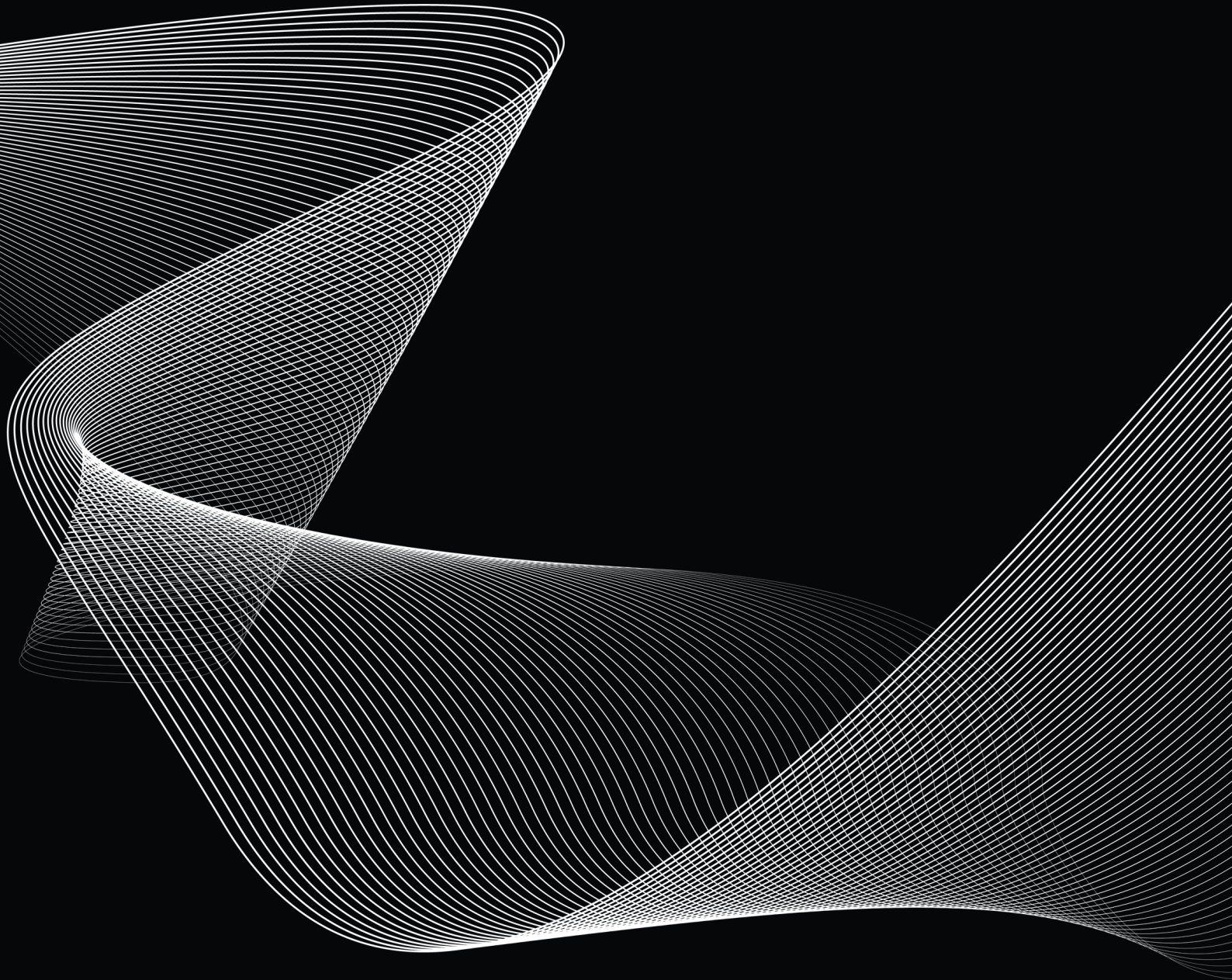




# Modern Slavery Statement

FINANCIAL YEAR 2021-22



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# 01. ABOUT THIS STATEMENT

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

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**Air Trunk Pty Ltd, as trustee for AirTrunk Sydney Land Trust**

ABN 89 561 908 089

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**AirTrunk Holding T1 Pty Ltd, as trustee for AirTrunk Australia Holdings Trust**

ABN 89 469 259 695

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**Andante Holding Company Pty Limited, as trustee for Andante Holding Trust**

ABN 57 334 256 317

References to AirTrunk (we, us or our) throughout this Modern Slavery Statement refer to these entities and are also intended to include the broader AirTrunk Group, which includes entities not subject to the reporting requirements under the Modern Slavery Act 2018 (Cth), but which nonetheless intend to implement the key principles set out in this Modern Slavery Statement.

This statement is made in relation to the financial year commencing 1 July 2021 and ending 30 June 2022.

## 02. MESSAGE FROM THE CEO



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As the largest data centre provider in Asia Pacific & Japan (APJ), we remain committed to building a trusted and responsible business.

Acting ethically and with integrity, transparency and a zero-tolerance approach to instances of modern slavery is core to our operations. We expect our employees, business partners, contractors and those across our supply chain to uphold this standard.

In FY22, we further enhanced our systems and controls to:

- minimise the risks of modern slavery occurring in our supply chain and operations; and
- ensure any instances of modern slavery are investigated and addressed appropriately.

We continue to conduct our business in accordance with the United Nations Guiding Principles on Business and Human Rights and have become a participant in the United Nations Global Compact (UN Global Compact) which further demonstrates our commitment to protecting internationally proclaimed human rights.

With a responsibility to the communities in which we operate, respecting and valuing human rights will ensure our continued and sustainable expansion across region.

This statement, which addresses the financial year 2021-22, 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 and seek to protect the human rights of our communities.

Since our inception, no modern slavery incidents have been identified by AirTrunk in its operations or supply chain.

**ROBIN KHUDA,  
FOUNDER & CEO**

## 03. FY22 HIGHLIGHTS

During FY22, and since the end of the reporting period, AirTrunk is proud to have achieved certain milestones to minimise the risk of modern slavery in its business including:

01

Establishment of a cross-functional **Modern Slavery Working Group**, to develop and implement initiatives to monitor and reduce the risk of modern slavery across the business and review modern slavery risk as AirTrunk expands into new markets.

02

Bolstered our **due diligence processes** in respect of new and existing partners and suppliers, through introduction of a **third-party screening tool** and development of a **supply chain assurance programme**, which will be fully implemented by early FY24.

03

Strengthened and rolled out our annual **multi-tiered due diligence questionnaire** to understand modern slavery approach, supply chain management and workplace conditions of our key suppliers.

04

Became a **participant in the UN Global Compact**, the world's largest corporate sustainability initiative, thereby committing to aligning our strategies and operations with universal human rights and other principles.

# 04. OUR BUSINESS

AirTrunk is a best-in-class hyperscale data centre specialist creating a platform for cloud, content and large enterprise customers across the APJ region. AirTrunk designs, develops and operates data centre campuses with industry leading reliability, technology innovation and energy and water efficiency. Our suppliers and business partners support us in developing this infrastructure and providing services to our customers.

Founded in Australia and privately owned, AirTrunk currently has business operations in Australia, Singapore, Hong Kong and Japan. As the largest independent hyperscale data centre operator in APJ (with 1.2GW capacity across the platform), AirTrunk takes its responsibility to protect its communities seriously. With sustainability core

to its purpose ‘to scale and sustain the relentless growth of APJ’s digital future’, AirTrunk strives to set the standard by establishing bold and measurable commitments across its sustainability pillars: Planet, People and Progress. Our zero-tolerance approach to instances of modern slavery is central to these commitments.

Our business is organised into business units reflective of its primary functions including technology team (responsible for design), development team (responsible for construction) and operations team (responsible for data centre and core business operations). AirTrunk has approximately 200 employees across APJ, and as these employees predominantly consist of highly-skilled professionals engaged in accordance with local employment requirements, we consider this results in low modern slavery risk in our direct business operations.



\*Under development

# 04. OUR BUSINESS

## OUR PURPOSE AND VALUES

AirTrunk's purpose is to scale and sustain the relentless growth of APJ's digital future. Our purpose is underpinned by our company values, the principles we stand by.

These values are:



### ABOVE & BEYOND

We are passionate and helpful.



### DYNAMIC

We flex to find a way.



### RESPONSIVE

We align then move swiftly ahead.



### TRANSPARENT

We are open and respectfully direct.

These values are the cornerstones of who we are and are what drive us when engaging with each other, our suppliers and our customers.

# 04. OUR BUSINESS

## OUR SUPPLY CHAINS

The AirTrunk Group engages with multiple suppliers and third-party business partners. These suppliers and business partners are typically located in the countries in which we operate across the APJ region.

Most of our procurement activities involve sourcing goods and services required to develop and construct new 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 businesses we engage provide a wide range of services including:

- design and construction of data centres
- provision of data centre software and hardware
- facilities management
- security

In FY22, 12 organisations accounted for 80% of our total spend on goods and services. The majority of those key suppliers and business partners are large multi-national companies with established governance structures and their own corporate social responsibility programmes, including in relation to human rights and modern slavery<sup>1</sup>. The sophistication and best-in-class nature of our key suppliers, together with other actions AirTrunk is taking to address modern slavery (discussed in Section 6), AirTrunk confidence that any identified instances of modern slavery will be investigated and addressed appropriately.

Our commitment to sustainable growth, respect for our communities, the use of ethical labour and the eradication of modern slavery is fundamental to our procurement decisions at every point in our supply chain.

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<sup>1</sup> These key suppliers are headquartered in either Australia, Singapore, Japan, Europe or in the United States.



## 05. ASSESSMENT OF MODERN SLAVERY RISKS

AirTrunk acknowledges that there are risks in every business model, including in its own operations and supply chains. AirTrunk considers it fundamental to its sustainable growth and long-term success that these risks are identified, mitigated and managed appropriately.

Consistent with our risk assessment in prior years, we consider that AirTrunk has the following modern slavery risks in our business:

RISK	
01	AirTrunk does not always have visibility or approval rights over our Tier 1 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.

Further, whilst the countries in which AirTrunk operates exhibit comparatively lower modern slavery risk, AirTrunk acknowledges that the region encompassing Asia and the Pacific exhibits one of the highest prevalence of modern slavery globally.<sup>2</sup> Please see section 6 for details on the ways we seek to address these modern slavery risks.

AirTrunk continues to assess modern slavery risk on an ongoing basis, particularly where there are changes to its business, supply chains and geographic footprint. AirTrunk is also cognisant of the ways in which the impacts of COVID-19 continue to increase modern slavery risk across our global supply chains, and considers various ways in which to identify such increased risks, such as by increasing awareness of our Supplier Code and Conduct and whistleblowing policies.

<sup>2</sup> Walk Free (2018) Global Slavery index Regional Findings. Available at: <https://www.globallslaveryindex.org/2018/findings/regional-analysis/regional-findings/>.

## 06. ADDRESSING MODERN SLAVERY RISKS

To minimise and manage the modern slavery risks identified in AirTrunk’s business, AirTrunk:

Focus	Action
<b>CORPORATE POLICIES</b>	Maintains a suite of corporate policies communicating AirTrunk’s stance on modern slavery and human rights, including a Modern Slavery Policy, a Human Rights Policy and a Supplier Code of Conduct. These policies, adopted by the AirTrunk’s board of directors in 2021, are reflective of modern slavery and other risks in AirTrunk’s operations and supply chains and are in line with AirTrunk’s risk management strategy and activities. These policies are publicly available on AirTrunk’s website and communicated to suppliers as part of the onboarding process.
<b>“SPEAK UP” CULTURE</b>	Makes available an anonymous whistleblowing platform to ensure employees, contractors, suppliers and other business partners can anonymously raise modern slavery and other serious concerns with whistleblowing officers within AirTrunk. This is supported by the AirTrunk Group Whistleblowing Policy publicly available on AirTrunk’s website.
<b>SUPPLIER DUE DILIGENCE</b>	Conducts robust supplier due diligence (as discussed further in the FY22 initiatives section below).
<b>CONTRACTUAL REQUIREMENT</b>	Adopts contractual requirements, wherever possible, to ensure that suppliers have appropriate policies and procedures in place to address modern slavery risks and are legally obliged to inform AirTrunk of instances of modern slavery.
<b>AWARENESS TRAINING</b>	Delivers modern slavery awareness training to employees to ensure staff are equipped to identify modern slavery risks, via a compulsory training module made available to all staff and included as part of employee induction.
<b>REMEDICATION PLAN</b>	Maintains a modern slavery remediation plan to ensure any risks identified are addressed appropriately, with a ‘people focused’ approach to ensure that the wellbeing and fair treatment of any affected persons is always prioritised.

## 06. ADDRESSING MODERN SLAVERY RISKS

To further build upon the progress made in recent years and the practices outlined above, in FY22 AirTrunk:

- Established a cross-functional **Modern Slavery Working Group**;
- Bolstered our **due diligence processes** in respect of new and existing partners and suppliers, through introduction of a **third-party screening tool** and development of a **supply chain assurance programme**, which will become fully implemented in FY23.
- Strengthened and rolled out our annual **multi-tiered due diligence questionnaire** to understand modern slavery approach, supply chain management and workplace conditions of our key suppliers,
- Became a **participant in the UN Global Compact**, thereby committing to align our strategies and operations with universal human rights, labour rights and other principles.

Further details on these initiatives are set out below.

### MODERN SLAVERY WORKING GROUP

In FY22, we established a cross-functional Modern Slavery Working Group, comprising members of the legal, development and risk teams. This group meets monthly to develop and implement initiatives to monitor and reduce the risk of modern slavery in our business and review the modern slavery risk in the AirTrunk business as we grow into new markets. Key risks, and any emerging risks identified in this Modern Slavery Working Group are escalated and discussed with AirTrunk's executive team as required. The working group has implemented various initiatives in FY22, including introduction of a third-party supplier screening tool and strengthening of the annual multi-tiered due diligence questionnaire (each discussed below). The working group also reviews responses to the annual questionnaire (including third-party screening results) and determines whether further engagement is required with the relevant suppliers.

### SUPPLIER DUE DILIGENCE

#### *Third-party supplier screening*

In previous years, we strengthened our supplier due diligence processes so that human rights and modern slavery risks are assessed as part of this process. We have further strengthened this process in FY22, through procurement of a third-party screening tool so that the business has the capability to screen key, high-risk and new suppliers for a variety of critical risks, including modern slavery. This tool, amongst other things, screens nominated entities against an extensive media database covering over 35,000 news sources ensuring that AirTrunk is made aware of any reported modern slavery incidents with respect to those screened entities. AirTrunk has screened over 300 Tier 1 and Tier 2 suppliers through this screening tool, with no instances of modern slavery identified with respect to those entities.

## 06. ADDRESSING MODERN SLAVERY RISKS

### *Supply Chain Assurance Programme*

In FY22 and in the period following, the business has identified the need for a supply chain assurance programme so that AirTrunk may continue to meet its regulatory obligations, contractual obligations, ISO standards and UN Global Compact principles as it grows and matures. This programme will also allow AirTrunk to formalise its procurement strategy and build resilience into its supply chains by ensuring we engage the appropriate suppliers and have the appropriate risk mitigations in place. This programme, once fully implemented by early FY24, will allow AirTrunk to:

- onboard all suppliers, and manage existing suppliers, via a dedicated platform;
- systematically identify and manage risk and compliance throughout the supplier lifecycle supported by reputable third-party global databases;
- create and manage automated workflows to confirm compliance with AirTrunk's policies and standards and legal/regulatory obligations; and
- monitor against a variety of legal, financial, ESG, cyber and regulatory risks across a multitude of data sources.

Modern slavery risk will be identified and managed through this platform, which has the capability to allow AirTrunk to identify higher risk suppliers based on Global Slavery Indices and ESG predictors, while continuing to screen for modern slavery risks through adverse media searches.

### *Annual multi-tiered due diligence questionnaire*

In previous years, AirTrunk rolled out an annual modern slavery questionnaire to our Tier 1 suppliers which represented in aggregate 80% of our total spend on suppliers. The Modern Slavery Working Group improved this questionnaire in FY22 with more focussed questions on our key suppliers' approach to modern slavery, supply chain management and working conditions. Through this process, we will also have further visibility of our Tier 2 suppliers and will take steps to assess any modern slavery risks with those suppliers. With respect to Tier 2 and Tier 3 suppliers identified as part of the FY21 annual multi-tiered due diligence questionnaire, we screened those entities for any adverse media and confirm that no instance of modern slavery was identified.

### **UN GLOBAL COMPACT**

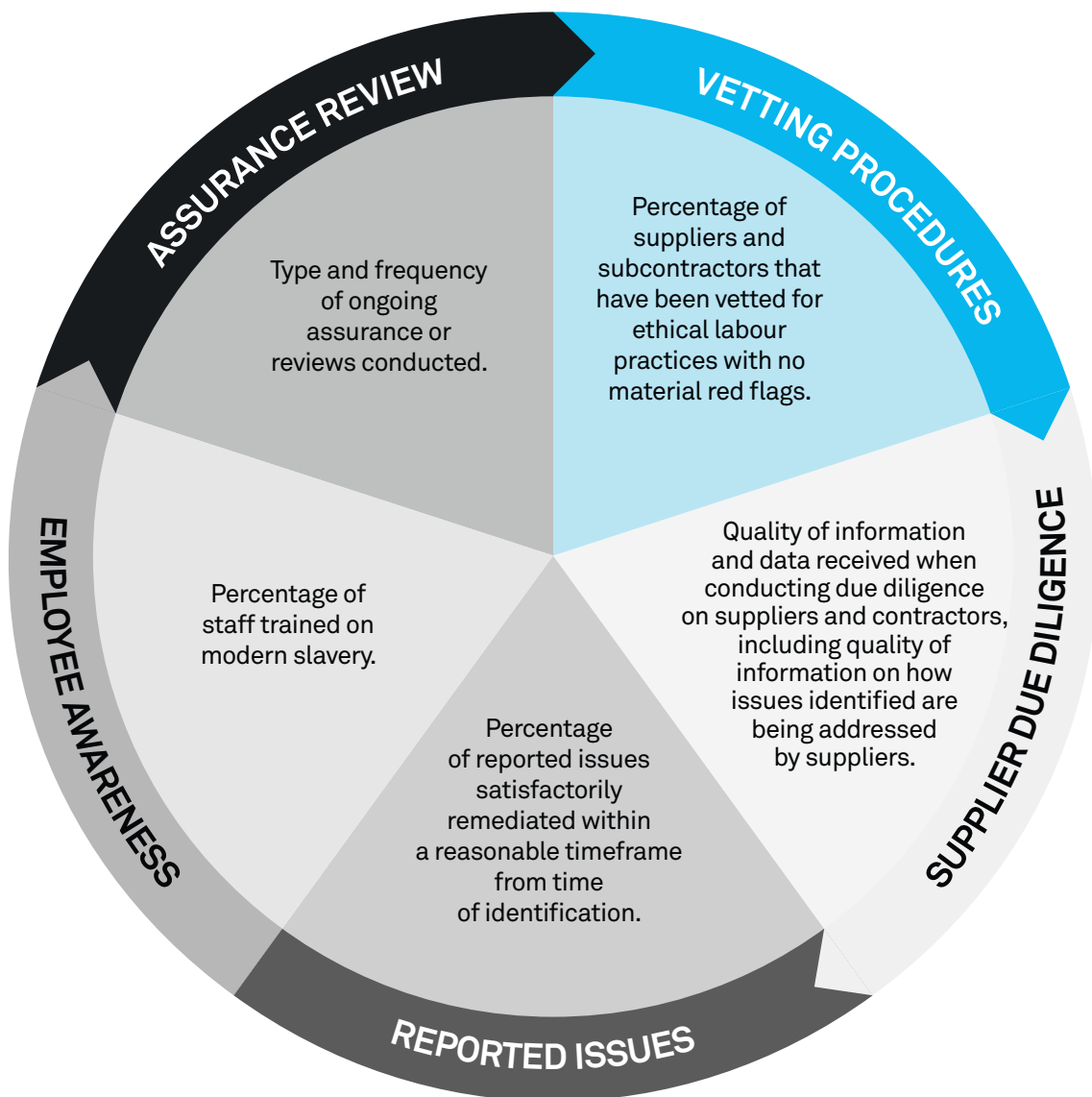
AirTrunk joined the UN Global Compact in FY22, which aims to mobilise a global movement of sustainable companies and stakeholders. As a participant, AirTrunk has committed to doing business responsibly by aligning our strategies and operations with the Ten Principles on human rights, labour, environment and anti-corruption. AirTrunk will annually report to UNGC to show our ongoing efforts in implementing the Ten Principles, including those relating to human rights and modern slavery, as set out below:

- support and respect for the protection of internationally proclaimed human rights;
- no complicity in human rights abuses;
- freedom of association and the effective recognition of right to collective bargaining;
- elimination of all forms of forced and compulsory labour;
- effective abolition of child labour; and
- elimination of discrimination in respect of employment and occupation.

# 07. MEASURING EFFECTIVENESS

AirTrunk is committed to the continued improvement of its human rights framework to combat modern slavery. The processes we employ to assess our effectiveness at dealing with modern slavery risks in our business and supply chains will continue to mature in line with our growth, changes in our operations and supply chains, the UNGP Principles, UN Global Compact and regulatory requirements.

To assess the effectiveness of its actions, AirTrunk evaluates the following performance indicators on an ongoing basis:



## 08. CONSULTATION AND APPROVAL

In developing our Modern Slavery Statement, we engaged with key business areas responsible for procurement, risk and legal. All reporting entities are under common management and directorship.

The Statement was approved on 26 October 2022 by the Board of Directors of each of the AirTrunk entities named in Section 1 of this Statement.

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

# APPENDIX: MANDATORY REQUIREMENT INDEX

The table below outlines the sections of this Statement which address AirTrunk's response to meet the mandatory reporting requirements of the *Modern Slavery Act 2018 (Cth)*.

No.	Reporting Requirement	Section
01	Section 16(1)(a): identify the reporting entities	01
02	Section 16(1)(b): describe the reporting entities structure, operations and supply chains.	04
03	Section 16(1)(c): describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	05
04	Section 16(1)(d): describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	06
05	Section 16(1)(e): describe how the reporting entity assesses the effectiveness of these actions.	07
06	Section 16(1)(f): describe the process of consultation with any entities the reporting entity owns or controls.	08
07	Section 16(1)(g): include any other information which the reporting entities consider relevant.	N/A