



# Global Switch Property (Australia) Pty Limited (ACN 094 051 779) & Global Switch Australia Holdings Pty Limited (ACN 138 200 049)

## Modern Slavery Statement for 2021



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### 1. INTRODUCTION

This Modern Slavery Statement is made pursuant to the *Modern Slavery Act 2018 (Cth)* (**the Act**) by Global Switch Property (Australia) Pty Limited (**Global Switch Property Australia**) and Global Switch Australia Holdings Pty Limited (**Global Switch Australia Holdings**) (together, **Global Switch Australia**) for the year ending 31 December 2021. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.

Global Switch Australia recognises that it has a responsibility under the Act to take a strong approach to reject any forms of modern slavery. We are committed to promoting ethical business practices and policies that protect workers from being abused and exploited, both in our own business and our supply chain. Global Switch Australia is committed to limiting the risk of modern slavery occurring in our business, ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chain. We expect our employees and our suppliers to share our commitment to help ensure modern slavery does not exist in our business and our supply chain.

### 2. OUR STRUCTURE AND OPERATIONS

Global Switch Australia is owned by Aldersgate Investment Limited. Global Switch Australia Holdings is a holding company which does not have any outward facing operations or undertakes external procurement. Global Switch Australia Holdings is the Australian parent company of Global Switch Property Pty Ltd, and Global Switch Australia Pty Ltd (which is the 100% shareholder of the operating entity Global Switch Property Australia) (**Controlled Entities**). Aldersgate Investment Limited (BVI) is the 100% shareholder in Global Switch Group Limited (BVI) which is the 100% shareholder of Global



Switch Australia Holdings.

During the reporting period this statement covers, the Board of Directors for Global Switch Australia Holdings comprised Mr John Corcoran, Mr Damon Reid and Mr Grant Winberg, the Board of Directors for the Controlled Entities and Global Switch Property Australia comprised Mr John Corcoran and Mr Damon Reid, and Mr Grant Winberg is the company secretary for Global Switch Australia and all Controlled Entities. As such the Board of Global Switch Australia Holdings have control over the overall business decisions of each of these entities. Global Switch Australia Holdings, Global Switch Property Australia and the Controlled Entities each have their registered office in Ultimo, New South Wales.

Global Switch Australia owns and operates a business in providing technical space in large facilities based in global financial hubs with resilient 24x7x365 power and cooling, security, infrastructure and environmental monitoring for our customers to house their computer servers, network equipment and other IT infrastructure. Our employees are engaged in the management of our data centres, supporting our customers and operating our technical facilities. We do not own or operate any manufacturing facilities, nor construction companies.

Global Switch Property Pty Ltd is a dormant entity. Global Switch Australia Pty Ltd was formerly the Australian parent company prior to a restructure, and now serves no function other than to own 50% of the land and building of Global Switch's Sydney West data centre.

Global Switch Property Australia employs approximately 30 staff, including management, operations, projects, finance, sales and customer service.

### **3. OUR SUPPLY CHAINS**

Our supply chains consist primarily of domestic and international vendors in industry sectors such as equipment manufacturing, construction and engineering. We also engage with consultancy service providers which support Global Switch Australia's day-to-day functions relating to facilities management, IT, operations, sales, marketing, communications, legal, finance and human resources. We have multi-year contracts for UPS maintenance, cleaning, manned security, chiller maintenance and facilities management.

Additionally, we bespoke build and supply customer requirements based on their needs, so sourcing can be varied depending on customer requests.

There have been no significant changes to our suppliers in this reporting period.

### **4. RISKS OF MODERN SLAVERY IN OUR OPERATIONS & SUPPLY CHAINS**

As there have been no significant changes to our suppliers in this reporting period, there remains generally a low risk of modern slavery in Global Switch Australia's operations and supply chains and the operations and supply chains of the Controlled Entities, with equipment manufacturers producing specialised and technically complex items that require a skilled workforce which is generally less vulnerable to exploitation. In addition, the manufacture of the plant and equipment used by us generally takes place in countries where there are strong safeguards against slavery, human trafficking and the exploitation of people generally such as Germany and USA.



As a significant number of our supplier's operations are based in Australia, and are required to comply with the Act and employment laws regarding minimum wages and working conditions, these suppliers have a low risk of modern slavery occurring in their supply chains.

We continue to consider that the greatest risks of modern slavery in our supply chain is overseas equipment suppliers. This is because manufacturing of such equipment is likely to occur in locations with minimal regulation and oversight of labour practices. There is a risk that equipment is manufactured from raw materials which are produced by workers who are subject to modern slavery. By way of example, there have been reports of forced labour in electronics factories in China and Malaysia, including factories supplying large multinational companies. As a result, Global Switch's procurement and facilities management teams work closely together to develop and update specific modern slavery risk assessments on these suppliers on commencement of the engagement and on an ongoing basis.

## **5. ACTIONS TAKEN TO ASSESS AND ADDRESS THE RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS**

### **Ongoing risk assessment**

We are incorporating comprehensive due diligence processes and procedures in our procurement to ensure that we meet the standards required under the Act. Additionally, we are incorporating terms in our standard procurement agreements requiring our suppliers to adhere to the requirements of the Act and our policy on the prevention of slavery and human trafficking.

During the reporting period, we did not identify any elements of our supply chain that may be of higher risk and would require us to physically audit it. This is a continuous process and we are committed to undertaking physical inspections where our risk assessment determines this to be appropriate.

In honouring our commitment to act with integrity in all business dealings, we may perform a risk assessment of our key suppliers of goods and services where the type of service or goods supplied may give rise to risks of modern slavery and address these by implementing policies, diligence, training, repair, and other mitigation activities. Risks assessments are continuously improved and may include:

1. Evaluating whether to issue questionnaires to high-risk suppliers and service providers to request information on proper diligence procedures in their supply chain;
2. Implementing action plans based on such responses; seek to work with suppliers to address risk areas and / or modify our supply relationships to reduce or eliminate risks; and
3. Performing visits as appropriate.

Our evaluation includes an assessment on whether a potential partner engages in any of the following high risk behaviours:



Indicators of Modern Slavery Risks	
TOPIC	Suspected Risk Behaviours
Sector and Industry Risks	<ul style="list-style-type: none"> <li>• Unskilled or seasonal labour</li> <li>• Short term contracts and outsourcing</li> <li>• Foreign or temporary workers</li> </ul>
Product and Services Risk	<ul style="list-style-type: none"> <li>• Products produced with short delivery time-frames</li> <li>• Products sourced from high-risk countries</li> </ul>
Organisational Risks	<ul style="list-style-type: none"> <li>• Poor governance structures</li> <li>• Track record of human rights violations</li> <li>• Poorly managed procurement or auditing practices</li> </ul>
Geographic Risks	<ul style="list-style-type: none"> <li>• Poor governance and weak rule of law</li> <li>• Conflict</li> <li>• Inadequate protection of workers</li> </ul>
Hidden Risks	<ul style="list-style-type: none"> <li>• Areas where the organisation has limited visibility.</li> </ul>

Global Switch Australia is fully committed to and supports the goal of eradicating all forms of modern slavery and human trafficking and we continue to monitor our supply chain and seek to improve its processes and activity generally with a view to ensuring that goal is achieved.

**Internal Policies and Procedures**

Global Switch Australia are committed to ensuring that the standards set-out in the Act are adhered to across our global supply chain and that slavery, servitude, forced labour and human trafficking in all forms are prevented.

Within our own business, we operate a strict policy against modern slavery and human trafficking arising in any form. Global Switch Australia ensures that the policy is adhered to by all staff across all levels of employee.

Management – helps define the Company’s vision and policies in preventing modern slavery in our business and supply chain and highlight risks in all areas of our operations.

Legal – ensures our contractual agreements with suppliers and contractors include the requirement to adhere to relevant legislation where appropriate.

Human Resources – oversees the recruitment process in all parts of our business.

Procurement – identifies and assesses suppliers and flags any indication of modern slavery risks.

Operations – stays alert and identifies signs of modern slavery through daily interactions.

**Remediation Process**

Global Switch Australia is committed to eradicating any form of modern slavery and human trafficking. Our ongoing evaluation process internally and externally is shared with all levels of our workforce. Our



Executive Team welcomes direct reporting on potential modern slavery issues, whether the concern is internal or external. Whistle-blowers are protected, if they come forward with a disclosure regarding modern slavery, in the direct reporting system. If the complaint has been substantiated, the Executive Team will address the issue directly with the parties involved and contact the appropriate authorities depending on the circumstances. Remediation actions could include, but are not limited to, the introduction of appropriate education and training programs both in-house and through external offerings of associations, and online; termination of suppliers contracts; reporting to the local authorities where the modern slavery issue has been identified and financially support local organisations to assist in preventing and addressing modern slavery and human trafficking in the future.

## **6. ASSESSING THE EFFECTIVENESS OF THESE ACTIONS**

To measure the effectiveness of our actions to identify and combat modern slavery in our supply chain, Global Switch Australia ensures the inputs, processes, outputs and outcome of its modern slavery framework are reviewed and monitored.

Inputs - assess whether the due diligence/ risk assessment is effective at identifying risks of modern slavery in Global Switch Australia's supply chain and whether the questions pinpoint the possible risks.

Processes – discuss with the employees to see whether the individual and assessment teams understand the procedures and processes in evaluating the risks of risks of modern slavery in Global Switch Australia's supply chain; review whether training remains fit for purpose and effective at raising awareness among staff.

Output – determine through ongoing risk assessment whether the requirements we impose on suppliers are effective at reducing instances of modern slavery in our supply chain over time.

Outcome – review the record of cases identified and follow up with the victims in ensuring appropriate remediation has been given.

## **7. FUTURE DEVELOPMENTS**

In our upcoming reporting year, we aim to continue to refine and develop our approach to modern slavery compliance to build capacity within our business to monitor and act on modern slavery risks.

Global Switch Australia will continue to review our policies and procedures to ensure that we have sound governance processes in place to meet our modern slavery compliance requirements.

## **8. CONSULTATION AND APPROVAL**

This statement was developed in consultation with Global Switch Property Australia, Global Switch Australia Holdings and the Controlled Entities. As previously noted, each director of Global Switch Australia Holdings is either a director or company secretary of Global Switch Property Australia and the Controlled Entities. Global Switch Australia has a single operational entity being Global Switch Property (Australia) Pty Ltd. Managers from relevant departments including operations, security and



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procurement were consulted as part of developing this statement.

This statement has been approved by the Board of Directors of Global Switch Property Australia and Global Switch Australia Holdings on 20 December 2022.

A handwritten signature in black ink, appearing to read 'Damon Reid'.

Damon Reid

Managing Director