Macquarie Telecom Modern Slavery Statement

Macquarie Telecom Group is committed to high standards of conduct and ethical behaviour in its business activities and rejects all forms of modern slavery.

About Macquarie Telecom

Macquarie Telecom Group Limited is Australia's datacentre, cloud, cyber security and telecom company for mid to large business and government customers. We have offices in Sydney, Melbourne, Canberra, Brisbane and Perth. We own and operate five data centres in Sydney and Canberra. We are listed on the ASX (MAQ), and further details of our operations, structure and business segments are available in our 2020 Annual Report which can be found on the investor section of the Macquarie Telecom Group website: https://macquarietelecomgroup.com/investors/

This Modern Slavery Statement covers Macquarie Telecom Group Limited (ABN 72 056 712 228) and all its subsidiaries. Details of our subsidiaries can be found on page 70 of our 2020 Annual Report.

Macquarie Telecom's Policies relating to Modern Slavery

Modern slavery describes situations where victims are being deprived of their freedom through threats, coercion or deception.

Modern slavery includes the following types of exploitation: people trafficking; slavery, servitude; forced marriage; forced labour; debt bondage; child labour; and deceptive recruiting for labour or services.

In addition to the Board's Corporate Governance Statement, Macquarie Telecom has various policies which assist in managing modern slavery risks within its business and supply chains, including:

- Code of Conduct
- Whistleblower Policy
- Modern Slavery Policy
- Grievance Policy

Macquarie Telecom has implemented systems and controls to meet our obligations under the Act and supports the policy behind identifying and remedying modern slavery in operations and supply chains.

Risks of Modern Slavery and Due Diligence Processes

Macquarie Telecom Group is an Australian company with a strong focus on keeping our operations onshore. Our risk identification processes focus on downstream suppliers and how they may be connected to modern slavery risks in their supply chain. An example is vendors who manufacture IT equipment and hardware in developing countries.

We have implemented systems and controls to identify and manage potential risks of modern slavery and to comply with our obligations under the Act and any applicable state or territory legislation.

This includes continuing to work directly with our suppliers to ensure that their behaviours and practices are aligned with ours.

Key risk mitigation steps that we have undertaken for our first Statement include:

- Creation of a Modern Slavery Policy

- Developing an online training module for our staff on modern slavery awareness and regulatory requirements

- Creation of a Supplier Self-Assessment Questionnaire (SAQ) which we have provided to our high-risk suppliers to allow us to support our Modern Slavery Policy commitments and continue to monitor what steps our suppliers are taking to identify and manage risks of modern slavery

- Reviewing and updating our standard customer and supplier contracts to ensure they contain modern slavery terms that reflect the requirements of the Act

Modern Slavery Policy

During FY21, Macquarie Telecom implemented a Group-wide policy against modern slavery which applies to all persons working for or on behalf of Macquarie Telecom Group, including employees, directors, officers, agency workers, interns, contractors, consultants, third party representatives and business partners. The policy has been shared with our staff and high-risk suppliers and is available on the investor section of the Macquarie Telecom Group website.

If anyone becomes aware of or suspects that any modern slavery behaviours or practices are taking place within our operations or supply chains, they must immediately report this to the General Counsel, any other member of the legal team or to their relevant Executive.

Any breach of the Policy is a "Disclosable Matter" under our Whistle-blower Policy so a report can also be made to our Whistleblower Protection Officer.

Modern Slavery Training Module

Macquarie Telecom developed an online modern slavery training module to bring to life the issue for our staff. The training makes it clear that everyone employed or engaged by the Macquarie Telecom Group must read, understand and comply with the Modern Slavery Policy and that each play a part in preventing, detecting and reporting modern slavey within our operations or supply chain, including reporting matters to be addressed through the appropriate reporting channels.

Macquarie Telecom Code of Conduct, Culture and Whistleblower Policy

We are committed to promoting a culture of honesty, compliance and good corporate governance that upholds our values.

To this end, Macquarie Telecom maintains a Group-wide Code of Conduct which provides the framework for ethical conduct and sets out the basic principles that govern our ethical and legal obligations. Macquarie Telecom is committed to complying with all laws and regulatory requirements applicable to its operations, including those of the Act.

The Code of Conduct is supported by the Group's Whistleblowing Policy, which provides a channel for staff to raise disclosable matters (being matters concerning misconduct or improper situation and which include human rights matters.)

Macquarie Telecom staff undertake training on these policies.

Supply Chain Partner Requirements

Working with our suppliers to identify and understand the risks of modern slavery is a key step we are taking.

Each Macquarie Telecom Group staff member who deals with a high-risk supplier must:

- provide the key contact at that supplier with a link to this Policy;

- ask that person complete and return the Questionnaire; and

- advise the key person that the supplier must keep evidence showing the steps it has taken to comply with the Policy and let us see that evidence if we request it.

If any risks are found from a returned questionnaire, then that staff member should contact the General Counsel, another member of legal team to seek further guidance. That person will then work with the staff member to identify what further action is required from the supplier to address the risks.

All supply contracts that Macquarie Telecom entered into after the date of its Modern Slavery Policy contain an express prohibition on the supplier engaging in any modern slavery behaviour or practices. If the supplier fails to comply with this obligation, Macquarie Telecom may to terminate the contract.
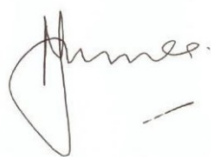
Each existing supplier has also been notified, that if it engages in any modern slavery behaviour and practices that we reserve our rights to review and/or terminate our arrangements with it.

Ongoing Modern Slavery Activities and Measuring Effectiveness

Looking forward, Macquarie Telecom recognises that preventing modern slavery requires a continuous commitment to improving its modern slavery risk identification and mitigation processes. Macquarie Telecom will continue year on year to do so and report through its annual Modern Slavery Statement. We will measure the effectiveness of our activities by looking for instances of modern slavery in our supply chain and remediating matters where identified. Instances may be identified by us directly or reported to us through avenues set out in the Modern Slavery Policy or the Whistleblower Policy.

Consultation statement

This statement was compiled by the parent company on behalf of its subsidiaries. All companies in the group are supported by a centralised Services function which is responsible for corporate governance within the group. This statement was approved by the members of the board of Macquarie Telecom Group Limited on 30 of March 2021.

Peter James (Chairman)
For and on behalf of the Board of Directors of Macquarie Telecom Group Limited