



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

**Modern Slavery Statement for 2022**



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We acknowledge that modern slavery is pervasive, and a risk in our operations and supply chain. While we have implemented a range of internal policies and procedures to help minimise and mitigate that risk, we understand there is still work to do. In line with our overarching commitment to human rights, we will continue to work to prevent modern slavery in our operations and supply chain.

Over 2022, we have:

- Continued to develop our due diligence processes and procurement procedures;
- Conducted risk assessments of our key suppliers; and
- Approved the introduction of modern slavery discussions in management review meetings.

## 1. INTRODUCTION

This Modern Slavery Statement is made pursuant to section 14 of 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 2022.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as forced labour, debt bondage, human trafficking, slavery and slavery-like practices such as servitude, forced marriage, deceptive recruiting for labour or services, and child 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 in 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 undertake 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**

In 2022, Global Switch Australia engaged with its major direct suppliers, all of which are predominately located in Australia, Germany and Belgium, to reinforce the business's position on modern slavery. A significant number of Global Switch Australia's direct suppliers and their operations are based in Australia, often have suppliers of their own, who then have their own suppliers as well, resulting in a complex supply chain. Therefore, considering modern slavery risks through these indirect, intermediary or adjacent suppliers has become a focus.

Global Switch Australia's directly contracted 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. The business has in place 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, therefore 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**

We understand that modern slavery risks refer to the potential for a business to cause, contribute to, or be directly linked to modern slavery through its operations or supply chain, in line with guidance from the Australian Government and the UN Guiding Principles on Business and Human Rights



(UNGPs).

Overall, we consider there to be a generally 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 Global Switch Australia generally takes place in countries where there are strong safeguards against slavery, human trafficking and the exploitation of people, such as Germany and the USA.

However, we acknowledge that raw material extraction and the manufacture of information technologies are by and large considered high risk industries for modern slavery. For this reason, we continue to consider that the greatest risks of modern slavery in our supply chain are overseas equipment suppliers, particularly those that may be present in our indirect supply chain. This is because the 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 that is 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 Australia's procurement undertakes specific modern slavery risk assessments on these suppliers on commencement of the engagement and on an annual basis thereafter.

We are aware that some industries we engage with are considered particularly high risk. For example, within the construction industry's highly competitive and cost-driven bidding process, social risks (including modern slavery and other human rights issues) are rarely prioritised. In Australia, companies in the construction industry commonly source materials from countries considered high-risk for modern slavery including India, Pakistan, North Korea, Cambodia, Myanmar, Bangladesh and the Philippines.

Although a significant number of our supplier's operations are based in Australia and are therefore required to comply with the Act and relevant employment laws relating to minimum wages and working conditions, we acknowledge that Australian-based suppliers should not be assumed to be low-risk. Migrant worker abuse is often reported in sectors such as construction or cleaning, demonstrating that modern slavery is not just an 'offshore issue'. Workers procured for services such as cleaning, security, and maintenance are considered a vulnerable population and are therefore a key modern slavery risk factor. This is because they are often from migrant, low socio-economic, or culturally and linguistically diverse backgrounds.

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

### **Ongoing risk assessment**

We continue to incorporate and evolve comprehensive due diligence processes and procedures in our procurement to ensure that we meet the standards required under the Act. In 2022, we





incorporated 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. This is a step in addressing modern slavery risks which may be present deep in our supply chain where we lack visibility of entities to which we do not have direct contractual relationships.

In honouring our commitment to act with integrity in all business dealings, we are performing more risk assessments 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. In 2023, we are looking to conduct risk assessments for all new supplier requests raised and undertake an annual verification process of existing suppliers through our Contractor Supplier Questionnaire. This questionnaire reinforces the risk assessment process by:

- requesting information from our direct suppliers about sub-suppliers, including country of origin;
- engaging with key suppliers to understand how they are addressing their modern slavery risks; and
- identifying existing credible assessments of entities in your supply chain, such as audit reports or NGO reviews.

Global Switch's major direct contracts with cleaning and manned security suppliers have recently been amended to incorporate a modern slavery clause. Further, a modern slavery clause is also included in Global Switch Australia's standard service and certain new supply contracts.

A committee consisting of department heads including the contractor manager, operations director, project director, security manager and managing director (together the "Committee") meets quarterly to assess ways to continuously improve our approach and strategy.

In accordance with UNGP 17 and 24, our approach is to focus on assessing general areas of our operations and supply chains where modern slavery risks are likely to be most significant. 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
<b>Sector and Industry Risks</b>	<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>
<b>Product and Services Risk</b>	<ul style="list-style-type: none"> <li>• Products produced with short delivery time-frames</li> <li>• Products sourced from high-risk countries</li> </ul>
<b>Organisational Risks</b>	<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>
<b>Geographic Risks</b>	<ul style="list-style-type: none"> <li>• Poor governance and weak rule of law</li> <li>• Conflict</li> </ul>



	<ul style="list-style-type: none"> <li>• Inadequate protection of workers</li> </ul>
<b>Hidden Risks</b>	<ul style="list-style-type: none"> <li>• Areas where the organisation has limited visibility.</li> </ul>

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.

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 is committed to ensuring that the standards set out in the Act are adhered to across our business operations and global supply chain and modern slavery in all forms is 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.

Department-specific risk management processes include:

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.

Reports of modern slavery or potential modern slavery may ultimately come to our attention through various channels. This includes as a result of due diligence conducted on our business operations and supply chain, or disclosures from workers or third parties such as the media. Global Switch Australia also has in place mechanisms and policies for personnel to make whistleblowing disclosures and to raise internal grievances. Where a complaint is substantiated by an internal or





external investigation, the executive team will address the issue directly with the parties involved and take appropriate remediation action. Actions 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; working with suppliers (if the risk has been identified in our supply chain) and exerting leverage to achieve improvement or, as a last resort, terminating the supplier contract; and reporting to the local authorities where the modern slavery issue has been identified if it is considered appropriate, taking into account the importance of protecting victims.

## 6. ASSESSING THE EFFECTIVENESS OF THESE ACTIONS

We are focussed on continuously improving and maturing our capacity to identify, manage, address and remediate modern slavery risk and impacts to ensure that modern slavery practices are better identified. A key step in doing this is to reflect on the effectiveness of our modern slavery response each year.

To measure the effectiveness of our actions to identify and combat modern slavery in our business operations and supply chain, Global Switch Australia ensures that the inputs, processes, outputs and outcomes of its modern slavery framework are reviewed and monitored quarterly by the Committee, who identify potential shortfalls in our procedures and actions, and assess ways to continuously improve our approach and strategy. More specifically, the Committee considers:

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.

Outputs – 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.

Outcomes – 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.

As one initiative, modern slavery risks will be introduced as part of the business's annual management review meetings for the purpose of evaluating improvements to risk assessment processes and identifying any high-risk suppliers.

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 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 27 June 2023.

A handwritten signature in black ink, appearing to be 'Damon Reid', written over a horizontal line.

Damon Reid

Director

