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# Macquarie Technology Group: Modern Slavery Statement

## FY2023

Macquarie Technology Group Limited (ABN 72 056 712 228) is committed to high standards of conduct and ethical behaviour in its business activities and rejects all forms of modern slavery.

### About Macquarie Technology Group

Macquarie Technology Group is Australia's datacentre, cloud, cyber security and telecommunications 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 2024 Annual Report which can be found on the investor section of the Macquarie Technology Group website: <https://macquarietechnologygroup.com/investors/>.

This Modern Slavery Statement covers Macquarie Technology Group Limited and all its subsidiaries. Details of our subsidiaries can be found on page 87 of our Annual Report.

### Macquarie Technology Group'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 Technology Group 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 Technology Group 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, including providing effective accountability mechanisms through our whistleblower and grievance processes to raise any concerns regarding unethical or illegal conduct, including where such conduct relates to modern slavery or human trafficking.

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## **Risks of Modern Slavery and Due Diligence Processes**

Macquarie Technology 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, or merchandise purchased by the Company for promotional purposes.

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 fourth Statement include:

- Continued adherence to our Modern Slavery Policy
- Mandating an online training module for our staff on modern slavery awareness and regulatory requirements
- Mandating face to face training on Modern Slavery for all new starters as part of their induction process
- Ongoing provision of a Supplier Self-Assessment Questionnaire (SAQ) 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
- Continuing to ensure our standard customer and supplier contracts contain modern slavery terms that reflect the requirements of the Act
- Monitoring press and industry publications for developing trends and focus areas

## **Modern Slavery Policy**

Macquarie Technology Group has implemented a Group-wide policy against modern slavery which applies to all persons working for or on behalf of Macquarie Technology 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 Technology 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 Group 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 Technology Group 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 Technology Group must read, understand and comply with the Modern Slavery Policy and that each play a part in preventing, detecting and reporting modern slavery within our operations or supply chain, including reporting matters to be addressed through the appropriate reporting channels.

### **Macquarie Technology Group 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 Technology Group 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 Technology Group 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 Technology Group 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 Technology 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 Group 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 Macquarie Technology Group supply contracts 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 Technology Group may 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 Technology Group recognises that preventing modern slavery requires a continuous commitment to improving its modern slavery risk identification and

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mitigation processes. Macquarie Technology Group will continue year on year to do so and report through its annual Modern Slavery Statement. We continue to 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.

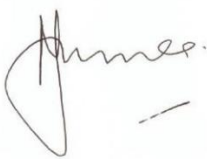
In addition, we have been proactively working with our customer base to educate our customers on Macquarie Technology Group's Modern Slavery activities, including through providing thorough responses to an increasing number of our customers' supply chain questionnaires and attending Modern Slavery training seminars hosted by our customers to understand key developments in the Modern Slavery landscape.

### **Consultation Statement**

This statement was compiled by Macquarie Technology Group's parent company on behalf of all its subsidiaries. All companies in the Group are supported by a centralised Services function which is responsible for corporate governance within the Group. In order to prepare this statement, we engaged with each of the reporting entities covered by this statement and consulted the entities we own or control.

An earlier version of this statement was approved by Macquarie Technology Group's Board in their capacity as principal governing body of Macquarie Technology Group Limited on 19 December 2023.

This updated statement supercedes the earlier version and was approved by Macquarie Technology Group's Board in their capacity as principal governing body of Macquarie Technology Group Limited on 9 January 2025.



**Peter James (Chairman)**

For and on behalf of the Board of Directors of Macquarie Technology Group Limited