

Modern Slavery Statement 2023

Megaport Limited ACN 607 301 959

Introduction

This statement is made by Megaport Limited (**Megaport**) pursuant to the Australian *Modern Slavery Act 2018* and the U.K. *Modern Slavery Act 2015* (collectively, the **Acts**) on behalf of its affiliates conducting business in Australia and the United Kingdom and covered by the respective Acts, as listed in Appendix A.

The Acts require reporting entities, including Megaport, to produce an annual modern slavery statement (**Statement**). This Statement has been prepared to meet the requirements of the Acts and outlines Megaport's approach to assessing and minimising the risk of modern slavery in its operations and supply chain during the reporting period commencing 1 July 2022 and ending 30 June 2023 (**Reporting Period**).

About Megaport

Megaport was founded in 2013 and is a leading provider of Network as a Service solutions. The company's global Software Defined Network helps businesses rapidly connect their network to services via an easy-to-use portal or our open API. Megaport offers agile networking capabilities that reduce operating costs and increase speed to market compared to traditional networking solutions. Megaport partners with the world's top cloud service providers, including AWS, Microsoft Azure, and Google Cloud, as well as the largest data centre operators, systems integrators and managed service providers in the world.

Megaport is an ISO/IEC 27001-certified company. Megaport is publicly listed on the Australian Securities Exchange.

Megaport now operates in 25 countries and has 263 employees. Our total revenue for the Reporting Period was AUD\$153.1 million.

Our business, operations, and supply chain

Megaport is committed to acting ethically and with integrity in relation to all aspects of our business. Megaport's commitment in this regard is reflected by our respectful treatment of staff, who are paid at or above award levels and provided with a safe working environment.

Megaport considers the risk of modern slavery within our business operations to be low as a result of our business model and lack of complex supply chains, which mostly consist of service providers and consultants, in addition to the procurement of software-related goods and services.

However Megaport appreciates that all organisations have a risk of modern slavery. Megaport recognises that there is a higher risk of modern slavery further down the supply chain. Megaport recognises that there is a specific risk of modern slavery in the provision and supply of software, data and cloud computing equipment and

componentry because of where the equipment is manufactured and where the raw materials originate from.

Megaport believes these risks are reduced for our business because our supply chain is predominantly located throughout Australia, the European Union and the United States. Each of these regions has a strong rule of law and relatively low instances of corruption. These regions also score well against established international social and developmental criteria.

How Megaport addresses its modern slavery risks

Our values

Megaport takes the obligation to act honestly and with integrity very seriously. This commitment is reflected through our core values which are integral to everything we do as a business. It is an expectation that all Megaport employees respect and support each other and share information openly and proactively.

It is a condition of employment for all Megaport employees to review and acknowledge our policies and procedures, including our Code of Conduct. Our Code of Conduct provides the blueprint for Megaport's culture and everyone is expected to observe and abide by the standards set out in the Code of Conduct.

Among other things, the Code of Conduct requires Megaport employees to:

- act with the utmost integrity and objectivity;
- avoid engaging in illegal, corrupt, fraudulent, dishonest or unsafe behaviour;
- deal with customers and suppliers fairly; and
- act ethically, responsibly and work with due care and diligence to identify and manage any risks to best ensure the protection of Megaport, its assets and resources, our employees, contractors, customers and the general public.

Ongoing monitoring of risk

Because Megaport has an increased risk of modern slavery down the supply chain, we are particularly committed to working with our suppliers to improve compliance and transparency related to modern slavery.

Megaport has various checks in relation to suppliers and business partners, including risk-based due diligence, business partner assessments and information verification, as required. These processes allow Megaport to identify instances of modern slavery or risks of modern slavery in our supply chain. Megaport has previously changed suppliers where our due diligence has revealed a potential risk of modern slavery.

Megaport is opposed to all forms of slavery and is committed to operating our business lawfully, ethically and with integrity. Megaport has a firm expectation that

our suppliers must operate and comply with all applicable laws and regulations, including in relation to:

- human slavery;
- slavery-like practices;
- human trafficking; and
- child labour.

What Megaport has done to address its modern slavery risks

Supplier Code of Conduct

Megaport's previous Statement included a commitment to establish a supplier code of conduct to support continued compliance with applicable laws and to further Megaport's efforts in addressing modern slavery.

Megaport has put this commitment into practice. During the Reporting Period, Megaport drafted a Supplier Code of Conduct (**SCoC**) and commenced rolling out this document with our suppliers.

Megaport's SCoC requires suppliers to assess, monitor and manage risks of modern slavery in their supply chain. Suppliers are also required to provide Megaport with information that will assist in assessing the risks of modern slavery. Similarly, suppliers are expected to comply with all applicable laws and regulations in relation to modern slavery and health & safety, and to support Megaport's compliance with all such laws and regulations.

Megaport believes that the SCoC strengthens Megaport's response towards modern slavery and the risk of modern slavery in our operations and supply chain.

Review of procurement processes

During the Reporting Period, Megaport undertook a review of its procurement processes. As part of this review, we have developed a set of guidelines that outline the sourcing process and minimum requirements for procurement activities at Megaport (**Procurement Guidelines**).

Under the Procurement Guidelines, all Megaport employees and contractors are required to:

- appropriately test the market to substantiate that value for money has been obtained for all spend; and
- adequately understand their exposure to, and obligations regarding the management of, risks emanating from transactions with suppliers.

The Procurement Guidelines also require employees and contractors to act ethically.

In this context, to 'act ethically' includes:

- to provide adequate transparency to enable appropriate scrutiny of each procurement activity;
- to be accountable for the actions and decisions taken in relation to a procurement activity and for the resulting outcomes; and
- to deal with suppliers equitably.

Training and Consultation

During the reporting period Megaport has consulted with external experts in relation to further enhancing our Modern Slavery compliance program to ensure continuous improvement in each reporting period.

Through the process of developing the SCoC and Procurement Guidelines outlined above, Megaport staff have received training on modern slavery risk identification and management.

Reporting concerns

Megaport offers multiple reporting channels that allow individuals to report confidential concerns, including in relation to modern slavery.

Megaport has identified the Whistleblowing Policy as a possible resource for employees to raise complaints regarding modern slavery.

Megaport is committed to reviewing and updating our Whistleblowing Policy during the next reporting period to include modern slavery as a specific matter that can be disclosed under the policy and that will be afforded whistleblower protections.

Assessing our measures and next steps


Over the course of the next reporting Period, Megaport will continue rolling out our SCoC more broadly across the business and with our suppliers.

As discussed above, Megaport will review and update our Whistleblowing Policy to include modern slavery complaints or concerns.

Megaport also recognises the importance of key team members receiving training to better identify and raise concerns about potential conditions which may result in modern slavery in our supply chain. During the next reporting period, Megaport will aim to identify specific teams that may benefit from training in relation to identifying and managing the risks of modern slavery.

Megaport will publish this Statement on our intranet site and other relevant internal employee communication channels.

This Statement was approved by the Megaport Board of Directors and is signed on its behalf by the Chairman, Bevan Slattery.


Bevan Slattery (Dec 19, 2023 15:00 GMT+10)

Bevan Slattery

**Chairman
Megaport Limited**

Appendix A: Reporting Entities

The following are the reporting entities covered by this joint Modern Slavery Statement for Australia and the United Kingdom.

Australia

Megaport Limited
Megaport (Services) Pty Ltd
Megaport (Australia) Pty Ltd

United Kingdom

Megaport (UK) Limited
Megaport (Europe) Limited