



Modern Slavery Statement 2024

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 managing the risk of modern slavery in its operations and supply chain during the reporting period commencing 1 July 2023 and ending 30 June 2024 (**Reporting Period**). This is our third Modern Slavery Statement and has been approved by the Board.

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 largest cloud service providers, 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 operates in 26 countries and has over 320 employees globally. Our total revenue for the Reporting Period was AUD\$195 million.

Our operations

Megaport recognises that modern slavery is a significant global problem and is committed to acting ethically and with integrity in all our business dealings. Megaport has zero tolerance to any form of modern slavery in our supply chain and is fully committed to preventing it.

Megaport does not have a centralised procurement function, given the size of our business. Each business unit is responsible for managing supplier relationships in accordance with our procurement policies and processes. These processes ensure that we engage with reputable suppliers and minimise exposure to modern slavery in our supply chain.

Megaport has assessed the risk of modern slavery within our business operations as low, for the following reasons:

- Our operations – we are predominantly located in Australia, the European Union and the United States. Each of these regions score well against established international social and developmental criteria.
- Our business model – as our services are largely automated, we have a low reliance on physical goods and manual labour-intensive processes.
- Our supply chains – we have greater visibility and control over suppliers because of the minimal layers within our supply chain.
- Our workforce – most of our workforce (~95%) are directly employed rather than temporary or outsourced labour. This gives us better control and monitoring of employment terms, benefits and working conditions.

Addressing our modern slavery risks

Given Megaport's complex global network of suppliers and partners, we are committed to upholding high ethical standards and embedding integrity across our business. This begins with our Code of Conduct, which all Megaport employees must abide by and provides the blueprint for Megaport's culture and operations. The Code of Conduct requires all employees to act ethically, as well as to deal with customers and suppliers fairly and work with due care and diligence to manage risks.

Megaport also maintains a rigorous framework for identifying, assessing, and managing modern slavery risks across our operations and supply chains. Our framework includes robust due diligence processes, which involve regular risk assessments of new and existing suppliers.

As part of Megaport's Modern Slavery Statement for the previous reporting period, we included commitments to:

- continue rolling out our Supplier Code of Conduct;
- update our Whistleblowing Policy; and
- introduce modern slavery training for specific teams.

We address the actions taken in relation to each of these commitments in detail below as they apply to the current Reporting Period.

Supplier Code of Conduct

Given the nature of our business and supply chains, Megaport is particularly committed to working with our suppliers to improve modern slavery compliance and transparency.

During the last reporting period, the Megaport Supplier Code of Conduct (**SCoC**) was developed. The SCoC set out Megaport's commitment to ethical, sustainable and socially responsible procurement, as well as the expectation of the same for all participants in Megaport's supply chains.

Our SCoC strengthens Megaport's response to modern slavery and the associated risks in our operations and supply chain.

Megaport's SCoC requires suppliers to:

- assess, monitor and manage risks of modern slavery in their supply chain;
- provide Megaport with information that will assist in assessing the risks of modern slavery; and
- comply with all applicable laws and regulations in relation to modern slavery and to support Megaport's compliance with all such laws and regulations.

During the Reporting Period, Megaport has continued to roll out the SCoC with our suppliers. We have updated our internal guidance and training resources to include a dedicated intranet page for employees that outlines Megaport's commitment to addressing modern slavery, including what this practically means to the business and our supply chain.

The SCoC has also been published prominently on the legal page of Megaport's website [here](#).

Whistleblowing policy

In April 2024, the board approved updates to Megaport's Whistleblowing Policy. The updated version outlines modern slavery as a specific type of disclosable conduct under which eligible whistleblowers could make a disclosure pursuant to the policy. This includes any form of modern slavery within Megaport's operations or supply chain – such as forced labour, human trafficking, child labour, debt bondage or exploitative work conditions.

The updated version of the Whistleblowing Policy has been shared internally with employees and published externally on Megaport's website [here](#).

This update is consistent with Megaport's commitment during the previous reporting period to include modern slavery complaints and concerns as part of the Whistleblowing Policy. During the reporting period, no incidents were reported.

Training

Megaport has identified that certain teams would benefit from targeted training on modern slavery risks. Due to the nature of their roles, Megaport's network procurement and engineering teams are more likely to encounter scenarios with potential exposure to such risks, especially when working with suppliers, subcontractors, or in specific regions.

By providing tailored training to employees working in procurement and engineering, Megaport aims to equip these teams with the knowledge and skills needed to identify, address and mitigate risks associated with modern slavery.

Assessing our measures and next steps

This statement sets out the efforts taken across the Megaport group to mitigate the risks of modern slavery to our business and our commitment to continuously improving in this area.


Next reporting period

In the next reporting period, Megaport will:

- Introduce a supplier risk assessment step into our procurement procedures to further embed our existing processes.
- Continue to require suppliers to comply with the Megaport SCoC (or equivalent) as a mandatory step in our procurement process, regardless of the risk of modern slavery assessed to the supplier.
- Continue educating staff engaged in procurement activities on the importance of assessing and managing the risks of modern slavery when engaging external parties.
- Require all employees to read and acknowledge the Whistleblowing Policy, which has been updated to include modern slavery as a specific type of disclosable conduct attracting whistleblower protections.

This Statement will be published on our intranet and website.

This Statement was approved by the Megaport Board of Directors and is signed on its behalf by the Chair, Melinda Snowden.



[Melinda Snowden \(Dec 20, 2024 12:55 GMT+11\)](#)

Melinda Snowden

Chair

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