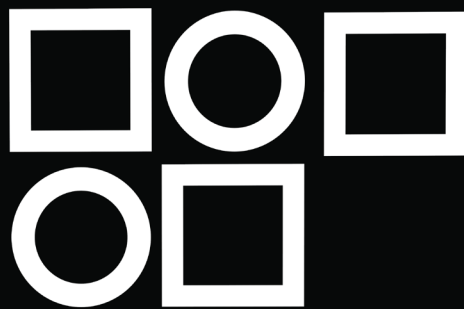
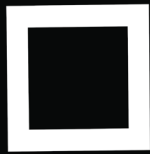




# Modern Slavery Statement

FINANCIAL YEAR 2020-21



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# 01. ABOUT THIS STATEMENT

This Modern Slavery Statement is jointly made by the following entities within the **AirTrunk** Group:

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**Air Trunk Pty Ltd, as trustee for AirTrunk Sydney Land Trust**

ABN 89 561 908 089

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**AirTrunk Holding T1 Pty Ltd, as trustee for AirTrunk Australia Holdings Trust**

ABN 89 469 259 695

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**Andante Holding Company Pty Limited, as trustee for Andante Holding Trust**

ABN 57 334 256 317

References to AirTrunk (we, us or our) throughout this Modern Slavery Statement refer to these entities and are also intended to include the broader AirTrunk Group, which includes entities not subject to the reporting requirements under the Modern Slavery Act 2018 (Cth).

This statement is made in relation to the financial year commencing 1 July 2020 and ending 30 June 2021.

## 02. MESSAGE FROM THE CEO



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At AirTrunk, we are committed to being a trusted and responsible business, acting ethically and with integrity across all of our business operations. It is a standard we expect our employees, business partners, contractors and those across our supply chain to uphold.

This includes respecting and valuing human rights, with a zero-tolerance approach to modern slavery.

Over this past year, we have developed a human rights framework which will ensure we conduct our business in accordance with the United Nations Guiding Principles on Business and Human Rights (**UNGP Principles**).

The development of this framework is more critical than ever to ensure our growth and continued expansion across the Asia-Pacific region is sustainable and respectful to our communities and their human rights.

This statement, which addresses the financial year 2020-21, sets out the steps we have taken to address our responsibilities under the Modern Slavery Act 2018, and how we will continue to meet our commitments and seek to protect the human rights of our communities.

Since our inception, no modern slavery incidents have been identified by AirTrunk in its operations or supply chain.

**ROBIN KHUDA**  
FOUNDER & CEO

# 03. FY21 HIGHLIGHTS

During FY21, and since the end of that reporting period, AirTrunk is proud to have achieved certain milestones to minimise the risk of modern slavery in its business including:

- Introduction of a **number of Policies**, including:

**Our Modern Slavery Policy**, to communicate our commitment to combatting modern slavery within our operations and supply chains.

**Our Human Rights Policy**, which represents our commitment to respect internationally recognised human rights standards.

**Our Supplier Code of Conduct**, which articulates our expectations and requirements for our business partners, suppliers and contractors.

**Our Code of Ethics and Business Conduct**, which sets out our expected standards of conduct and behaviour, including in relation to acting ethically and with integrity in all business dealings.

- Bolstered our **Whistleblowing Policy**, in line with best practice and jurisdictional requirements, to further foster the “speak up” culture at AirTrunk and encourage reporting of suspected instances of modern slavery and other human rights abuses.
- Delivery of **Modern Slavery Awareness Training** to all AirTrunk staff so that as an organisation we can more readily identify modern slavery risks in our business and supply chains.
- Introduction of **contractual requirements** within our template supplier contracts to address modern slavery legislation and supply chain risks.
- Strengthened our **due diligence** processes in respect of new and existing business partners and suppliers and conducted **multi-tiered due diligence investigations** into our key suppliers for FY20 and FY21 so that we can more readily assess modern slavery risks.

# 04. OUR BUSINESS

## WHO WE ARE AND WHAT WE DO

AirTrunk is a best-in-class hyperscale data centre specialist creating a platform for cloud, content and large enterprise customers across the Asia-Pacific region. AirTrunk designs, develops and operates data centres with industry leading reliability, technology innovation and energy efficiency. Our suppliers and business partners support us in developing this infrastructure and providing services to our customers.

Founded in Australia and privately owned, AirTrunk currently has business operations in Australia, Singapore, Hong Kong and Japan. Our business is organised into business units reflective of its primary functions including technology team (responsible for design), development team (responsible for construction) and operations team (responsible for data centre operations). AirTrunk has approximately 160 employees across APAC, and these employees predominantly consist of highly skilled professionals.



To find out more about our business, please go to [www.airtrunk.com](http://www.airtrunk.com)

# 04. OUR BUSINESS

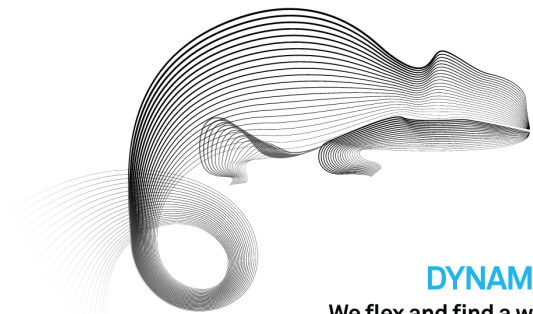
## OUR PURPOSE AND VALUES

AirTrunk's purpose is to scale and sustain the relentless growth of APAC's digital future. Our purpose is underpinned by our company values, the principles we stand by.

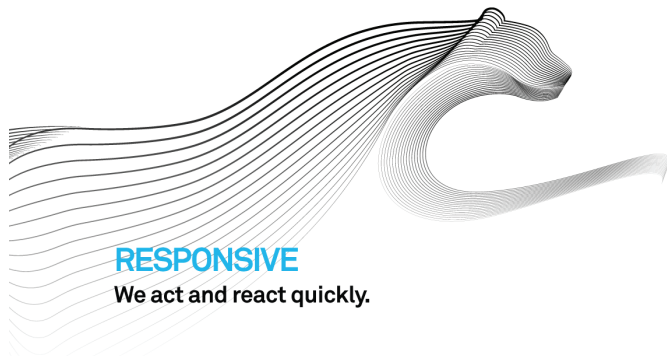
These values are:



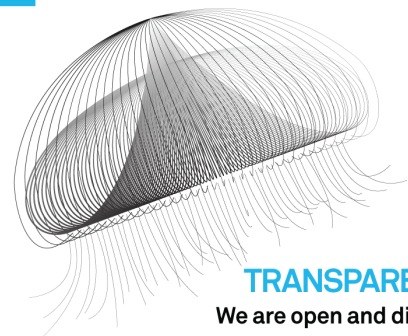
**ABOVE & BEYOND**  
We are passionate & helpful.



**DYNAMIC**  
We flex and find a way.



**RESPONSIVE**  
We act and react quickly.



**TRANSPARENT**  
We are open and direct.

These values are the cornerstones of who we are and are what drive us when engaging with each other, our suppliers and our customers.

# 04. OUR BUSINESS

## OUR SUPPLY CHAINS

The AirTrunk Group engages with multiple suppliers and third-party business partners. These suppliers and business partners are typically located in the countries in which we operate across the Asia-Pacific region. Most of our procurement activities involve goods and services required to develop and construct new data centres or the operation and maintenance of existing facilities. This includes:

- design and construction services
- critical data centre plant and equipment
- energy and utility services
- data centre operational facility management services and security
- information and communication services
- other professional services

The businesses we engage provide a wide range of services including:

- design and construction of data centres
- provision of data centre software and hardware
- facilities management
- security

In FY21, 13 organisations accounted for 80% of our total spend on goods and services procured by AirTrunk. The majority of those key suppliers and business partners are large national and global companies with established governance structures and their own corporate social responsibility programmes, including in relation to human rights and modern slavery. The sophistication and best-in-class nature of our key suppliers, together with other actions AirTrunk is taking to address modern slavery (discussed in Section 6), affords AirTrunk confidence in engaging in those commercial relationships.

Our commitment to sustainable growth, respect for our communities, the use of ethical labour and the eradication of modern slavery is fundamental to our procurement decisions at every point in our supply chain.



## 05. MODERN SLAVERY RISKS

AirTrunk acknowledges that there are risks in every business model, including in its own operations and supply chains. AirTrunk considers it fundamental to its sustainable growth and long-term success that these risks are identified, mitigated and managed appropriately.

Consistent with last year's assessment, we have identified the following modern slavery risks in our business:

RISK	
01.	AirTrunk does not always have visibility or approval rights over our Tier 1 suppliers' sub-contracting arrangements, leaving us exposed to a higher level of modern slavery risk.
02.	AirTrunk has limited visibility regarding ICT procurement in relation to tier 2 equipment suppliers and other suppliers deeper in the supply chain, for example, where our general contractor procures ICT equipment from third party suppliers.
03.	AirTrunk's construction and manufacturing contracts for the construction of our data centres and the critical infrastructure and equipment exhibit comparatively higher modern slavery risks due to the vulnerabilities in those industries and, in some cases, the location of the activities.

Whilst the countries in which AirTrunk operates exhibit comparatively lower modern slavery risk, AirTrunk acknowledges that the region encompassing Asia and the Pacific exhibits one of the highest prevalence of modern slavery globally.<sup>1</sup>

AirTrunk continues to assess modern slavery risk on an ongoing basis, particularly where there are changes to its business, supply chains and geographic footprint.

Walk Free (2018) Global Slavery index Regional Findings. Available at: <https://www.globalslaveryindex.org/2018/findings/regional-analysis/regional-findings/>.

## 06. ADDRESSING MODERN SLAVERY





To minimise and manage the modern slavery risks identified in its business, in FY21 AirTrunk:

- published publicly **new corporate policies** communicating AirTrunk’s stance on modern slavery and human rights;
- delivered **modern slavery awareness training** among its employees to ensure its staff were equipped to identify modern slavery risks;
- strengthened our **supplier due diligence procedures** to ensure AirTrunk’s key suppliers were appropriately tackling and addressing modern slavery risks in their own supply chain; and
- developed an AirTrunk **modern slavery remediation plan** to ensure risks identified are addressed.

Further details on these initiatives are set out below.

### CORPORATE POLICIES TACKLING MODERN SLAVERY RISKS

AirTrunk recently introduced the following corporate policies to tackle the modern slavery risks in its supply chain:

FOCUS	ACTION
 <p><b>MODERN SLAVERY POLICY</b></p>	<p>This Policy reflects our commitment to acting ethically and with integrity in all its business relationships and implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its supply chains.</p>
 <p><b>HUMAN RIGHTS POLICY</b></p>	<p>This Policy requires all AirTrunk personnel to adhere to international human rights standards and holds our suppliers and business partners to the same high standards. AirTrunk is committed to the communities in which it operates and to ensuring it has a social licence to operate.</p>
 <p><b>SUPPLIER CODE OF CONDUCT</b></p>	<p>This Supplier Code of Conduct, which all suppliers must comply with, requires that, amongst other things, our suppliers conduct their business activities in a manner which respect human rights and which combats instances of modern slavery.</p>
 <p><b>WHISTLEBLOWING POLICY</b></p>	<p>We bolstered our Whistleblowing Policy in FY21 to further underpin the policies outlined above, and to ensure a transparent working environment where our employees, contractors and other business partners can confidentially and anonymously raise modern slavery concerns with AirTrunk. This revised policy reflects our geographic footprint, the regulatory requirements of the countries in which we operate and best-in-class practice.</p>

Each of these policies have been communicated to our suppliers and are also available for viewing on the AirTrunk website [www.airtrunk.com](http://www.airtrunk.com).

## 06. ADDRESSING MODERN SLAVERY

We have also introduced a **Code of Ethics and Business Conduct** which sets out our expected standards of conduct and behaviour for AirTrunk staff. The objective of the policy is to assist our staff to uphold AirTrunk's values and guide them to act ethically, with honesty, integrity and professionalism in all activities and business dealings.

### MODERN SLAVERY AWARENESS TRAINING

AirTrunk acknowledges that its people play a critical role in ensuring that instances of modern slavery are identified. AirTrunk conducted compulsory training for all its staff on modern slavery in FY21 to raise awareness of modern slavery. The training focussed on what modern slavery is, red flags to be aware of and case studies of modern slavery tailored to our industry and business. This training is mandatory for all new staff and will be refreshed for all staff every two years.

We have also conducted compulsory training on AirTrunk's revised *Whistleblowing Policy*, to ensure our workforce is aware of the channels available to raise concerns confidentially, without fear of reprisal.

### SUPPLIER DUE DILIGENCE

#### *Supplier On-boarding*

In FY21, we strengthened our supplier due diligence processes so that human rights and modern slavery risks are assessed as part of this process. This on-boarding process also assesses the prospective suppliers' own frameworks to manage the risk of modern slavery in their own operations and supply chains. This due diligence

process is utilised for all prospective suppliers, and is also being rolled out to our existing suppliers, with priority to those suppliers we consider may present a higher risk of modern slavery. These suppliers, prospective and existing, are also required to confirm they will comply with our *Modern Slavery Policy*, *Human Rights Policy* and *Supplier Code of Conduct* as part of this due diligence process.

#### *Contractual Requirements*

We have also introduced new modern slavery provisions into our template supplier agreements to ensure that, amongst other things, each supplier has its own policies and procedures to address modern slavery risks, are legally obliged to inform AirTrunk where there are instances of modern slavery in its supply chains and are otherwise required to comply with applicable modern slavery legislation. We continue to introduce these provisions into recurring engagements and into our high-risk engagements, so that over time, all of our suppliers will be subject to these critical legal obligations. Consistent with our zero tolerance approach to modern slavery, AirTrunk is able to terminate the relevant contract where any of these obligations are breached by the supplier.

#### *Key Supplier Assessments*

In FY21, we introduced an annual modern slavery questionnaire which we distributed to our Tier 1 suppliers which represent in aggregate 80% of our total spend on suppliers. This questionnaire, consistent with best practice, requires our key suppliers to drill down on their respective workforce demographics and other relevant information. Through this process, we will have further visibility of our Tier 2 and Tier 3 suppliers for FY21 and will take steps to assess any modern slavery risks.

# 06. ADDRESSING MODERN SLAVERY

## REMEDIATION PLAN

No modern slavery incidents were identified by AirTrunk in its operations or supply chain in FY21.

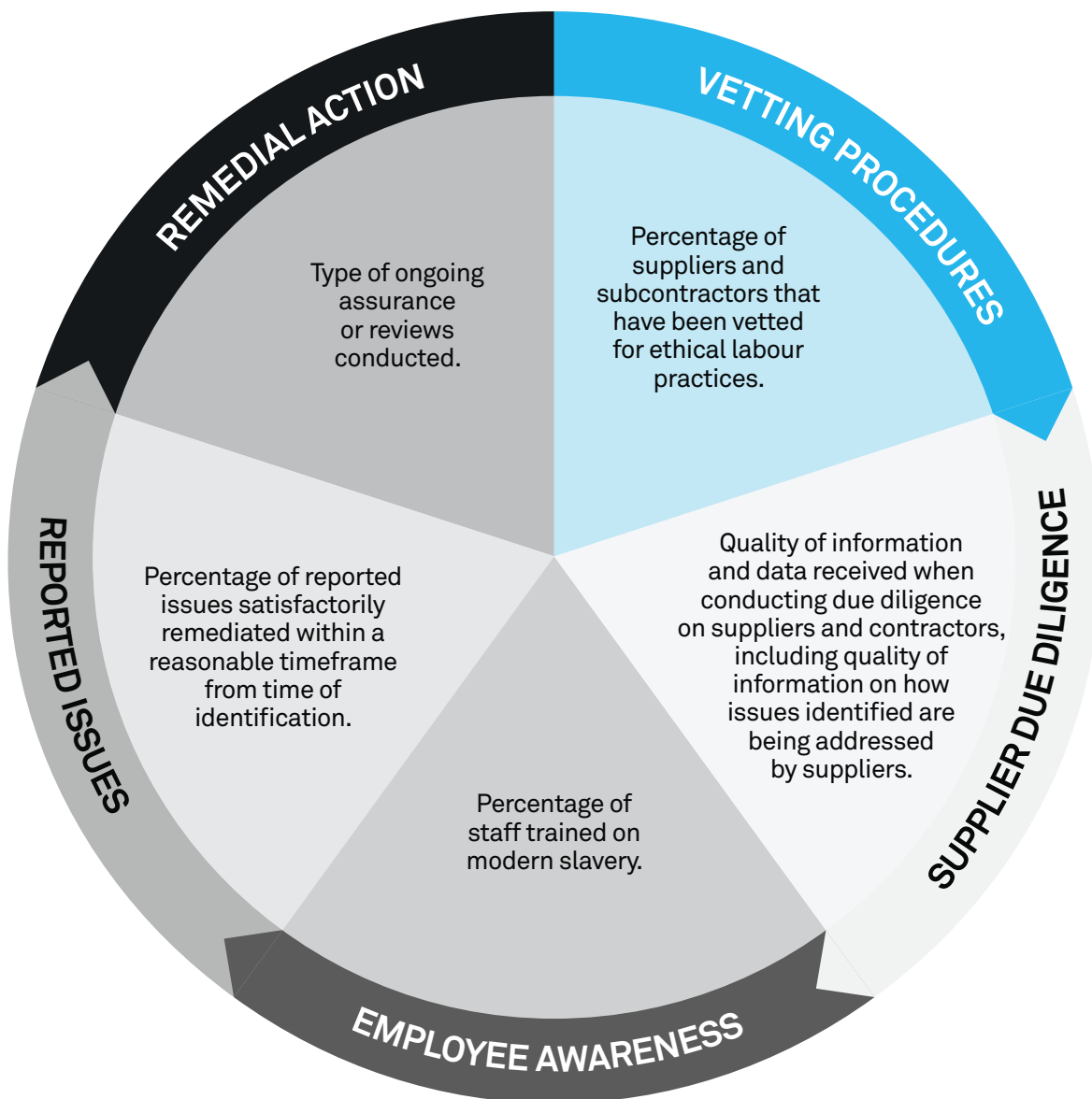
AirTrunk is committed to ensuring that all suspected instances of modern slavery are addressed appropriately. We have strengthened our *Whistleblowing Policy* to ensure our staff, suppliers and business partners, wherever they work, can raise their concerns confidentially, without fear of reprisal. Our Whistleblowing Policy enables reports to be made anonymously, in a range of languages, and outside of working hours. The reporting mechanisms are publicly available via AirTrunk's website, and can be accessed by any third party wishing to make a report. We have also engaged an external whistleblowing provider so that reports can be made to this external provider, independent of AirTrunk.

Where instances of modern slavery are suspected, AirTrunk will work closely with the relevant business unit, relevant supplier and with external advisers as necessary to ensure that the concern is investigated thoroughly and the most appropriate remediation steps are taken. While remediation steps will differ depending on the specifics of any concern raised, AirTrunk will ensure that a 'people focused' approach is adopted to ensure that the well-being and fair treatment of any affected persons is always prioritised, and that steps are taken to avoid 'tipping off' any person who is the subject of a report. Any information collected (including personal information) as part of any investigation will be protected in line with applicable laws.

# 07. MEASURING EFFECTIVENESS

AirTrunk is committed to the continued improvement of its human rights framework to combat modern slavery. The processes we employ to assess our effectiveness at dealing with modern slavery risks in our business and supply chains will continue to mature in line with our growth, changes in our operations and supply chains, the UNGP Principles and regulatory requirements.

To assess the effectiveness of its actions, AirTrunk evaluates the following performance indicators on an ongoing basis:

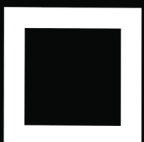


## 08. CONSULTATION AND APPROVAL

In developing our Modern Slavery Statement, we engaged with key business areas responsible for procurement, risk and legal.

The Statement was approved on 26 October 2021 by the Board of Directors of each of the AirTrunk entities named in Section 1 of this Statement.

The AirTrunk Group is dedicated to continuous improvement to address the challenging and complex issue of modern slavery.



# APPENDIX: MANDATORY REQUIREMENT INDEX

The table below outlines the sections of this Statement which address AirTrunk's response to meet the mandatory reporting requirements of the *Modern Slavery Act 2018 (Cth)*.

No.	Reporting Requirement	Section
1	Section 16(1)(a): identify the reporting entities.	01
2	Section 16(1)(b): describe the reporting entities structure, operations and supply chains.	04
3	Section 16(1)(c): describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	05
4	Section 16(1)(d): describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	06
5	Section 16(1)(e): describe how the reporting entity assesses the effectiveness of these actions.	07
6	Section 16(1)(f): describe the process of consultation with any entities the reporting entity owns or controls.	08
7	Section 16(1)(g): include any other information which the reporting entities consider relevant.	N/A