



**Global Switch Property (Australia) Pty Limited (ACN 094 051 779), Global Switch Australia Pty Ltd (ACN 094 338 333), Global Switch Property Pty Ltd (ACN 138 401 957) & Global Switch Australia Holdings Pty Limited (ACN 138 200 049)**

**Modern Slavery Statement for 2023**



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We acknowledge the risk of modern slavery practices in our operations and supply chain. Despite the implementation of various internal policies and procedures to mitigate this risk, we recognize the ongoing work required. Aligned with our unwavering commitment to human rights, we are steadfast in our dedication to ethical business practices. Modern slavery and human trafficking have no place in our operations or supply chains, providing reassurance to our stakeholders of our strong values and principles.

Over 2023, we have:

- Continued to develop, review and revise our due diligence processes and procurement procedures;
- Conducted thorough risk assessments to identify and mitigate potential risks of modern slavery within our supply chains, including assessing geographical, sectoral, and operational risks and implementing appropriate due diligence processes to address any identified risks;
- Continued to hold discussions on this issue in our management review meetings, fostering an environment of continuous improvement and optimism about the future;
- Implemented robust policies and procedures that prohibit any form of modern slavery or human trafficking within our operations and supply chains. These policies are embedded within our corporate governance framework and are regularly reviewed and updated to ensure effectiveness;
- Monitored compliance with our modern slavery policies and procedures;
- Conducted regular audits and assessments of our supply chain; and
- Engaged with stakeholders and industry partners to share knowledge and best practices in relation to assessing and addressing modern slavery risk.

## 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 (ACN 094 051 779) (**Global Switch Property Australia**), Global Switch Australia Pty Ltd (ACN 094 338 333), Global Switch Property Pty Ltd (ACN 138 401 957), and Global Switch Australia Holdings Pty Limited (ACN 138 200 049) (**Global Switch Australia Holdings**) (together, **Global Switch Australia**) for the year ending 31 December 2023.

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. At Global Switch Australia, we recognise the complexity of global supply chains and the potential risks they pose in terms of modern slavery and human trafficking. As a responsible corporate citizen, we strive to mitigate these risks through stringent policies and proactive measures.

Global Switch Australia strongly rejects 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 supply chain. Global Switch Australia is committed to limiting the risk of modern slavery occurring in our business, ensuring there is transparency in our industry 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 ultimately owned by Aldersgate Investment Limited. Global Switch Australia Holdings (ACN 138 200 049) 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 (ACN 138 401 957), and Global Switch Australia Pty Ltd (ACN 094 338 333) (which is the 100% shareholder of the operating entity Global Switch Property Australia (ACN 094 051 779)). Global Switch Australia Pty Ltd and Global Switch Property Pty Ltd, while being entities controlled by Global Switch Australia Holdings, are also reporting entities as the revenue of Global Switch Property Australia forms part of the consolidated revenue of these 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.

Global Switch Property Pty Ltd is a dormant entity. Prior to a restructure, Global Switch Australia Pty Ltd was the Australian parent company, and it now serves no function other than owning 50% of the land and building of Global Switch's Sydney West data centre. As such, references to the activities of Global Switch Australia are references to the activities of Global Switch Property Australia. Global Switch Property Pty Ltd and Global Switch Australia Pty Ltd do not have any operating activities.

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 Global Switch Property Pty Ltd, Global Switch Australia Pty Ltd and Global Switch Property Australia comprised Mr John Corcoran and Mr Damon Reid; and
- Mr Grant Winberg is the company secretary for all entities comprising Global Switch Australia.

As such, the Board of Global Switch Australia Holdings has control over the overall business decisions of each of these entities. The entities comprising Global Switch Australia are each incorporated in Australia, and each have their registered office in Ultimo, New South Wales.

Global Switch Australia owns and operates a business 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 manage our data centres, support our customers, and operate our technical facilities. We do not own or operate any manufacturing facilities or construction companies.



Global Switch Property Australia employs approximately 33 staff, including management, operations, projects, finance, sales, and customer service.

### 3. OUR SUPPLY CHAINS

In 2023, Global Switch Australia engaged with its major direct suppliers, 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 and 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 multi-year contracts for UPS maintenance, cleaning, manned security, chiller maintenance and facilities management. We also bespoke build and supply customer requirements based on their needs. Therefore, sourcing can be varied depending on customer requests.

No significant changes have been made to our suppliers in this reporting period.

### 4. RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS & SUPPLY CHAINS

We understand that risks of modern slavery practices refer to the potential for a business to cause, contribute to, or be directly linked to modern slavery through its operations or supply chains, 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 practices in Global Switch Australia's operations and supply chains, 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 practices 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 suppliers' 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. We conduct due diligence processes for all new suppliers to assess and mitigate risks related to modern slavery, including reviewing supplier policies, ensuring that modern slavery is addressed in our ongoing contracts and engaging with suppliers to ensure compliance with our standards is upheld throughout the life of the engagement with the supplier.

In 2023, we continued to ensure that the terms in our standard procurement agreements require our suppliers to adhere to the Act's requirements and our policy on the prevention of slavery and human trafficking (having introduced these standard agreement terms in 2022). This is a step in addressing modern slavery risks which may be present deep in our supply chain where we lack visibility of entities with which we do not have direct contractual relationships.

In honouring our commitment to act with integrity in all business dealings, we are continuing to increase the risk assessments we perform 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, where risks are identified, address these by implementing policies, diligence, training, repair, and other mitigation activities. We conduct risk assessments for all new supplier requests 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;
- identifying existing credible assessments of entities in their supply chain, such as audit reports or NGO reviews; and
- where available, reviewing the suppliers' modern slavery policies and procedures.

Global Switch Australia's major direct contracts with cleaning and manned security suppliers incorporate a modern slavery clause. Further, a modern slavery clause is also included in Global Switch Australia's standard service and new supply contracts. These clauses require all contracted parties to ensure that they are performing their obligations in connection with the agreement and:

- (a) not engage in any conduct or omission which may contravene any Modern Slavery Laws;
- (b) comply with all Global Switch Australia policies relating to modern slavery;
- (c) undertake all processes necessary to mitigate or reduce modern slavery risks in its operations and supply chains and to stay in compliance with all standards set out in the Act and other relevant legislation;
- (d) on the discovery of a commitment entered with any personnel engaged to provide goods or services in connection with this contract, permit the termination of the commitment where the Contractor has reasonable grounds to believe there has been or is likely to be, a breach of any applicable Modern Slavery Laws; and
- (e) require the Contractor to:
  - (i) promptly notify Global Switch Australia if it becomes aware of a possible, potential, suspected or actual breach by it of any Modern Slavery Laws;
  - (ii) cooperate in good faith with Global Switch Australia in investigating the circumstances relevant to any possible, potential, suspected or actual breach of any Modern Slavery Laws, whether notification has been given in connection with the contracted goods and services;
  - (iii) give assistance and access to the agreements as Global Switch Australia may reasonably require relating to the contract and provide (at the Contractor's cost) all reasonable assistance (including the provision of information) to Global Switch Australia to allow Global Switch Australia to comply with its obligations under Modern Slavery Laws;



- (iv) establish and maintain policies and procedures to ensure that the Contractor complies with the obligations by the conditions of the contract and ensure that its policies and procedures contain requirements whereby training will be provided to the Contractor’s personnel concerning the matters addressed by those policies and procedures; and
- (v) require any subcontractor or supplier to implement their binding guidelines for ethical behaviour and compliance with Modern Slavery Laws.

If Global Switch Australia determines that it has reasonable grounds to suspect a past, present or potential breach by the Contractor of any applicable Modern Slavery Laws or any of Global Switch Australia policies relating to modern slavery in connection with the contract, Global Switch Australia may give notice in writing to the Contractor requiring an explanation, copies of agreements, and access (for interview by internal or external lawyers) to the Contractor’s representatives.

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:

<b>Indicators of Modern Slavery Risks</b>	
<b>TOPIC</b>	<b>Suspected Risk Behaviours</b>
<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> <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 conduct a physical audit. 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 to ensure that goal is achieved.

### **Internal Policies and Procedures**

Global Switch Australia is committed to ensuring that the standards set out in the Act and other relevant legislation 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 takes steps to ensure 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 executive team welcomes direct reporting on potential modern slavery issues, whether the concern is internal or external. In this reporting period, we thoroughly reviewed and updated our Whistleblower Policy, a critical mechanism for reporting human rights grievances internally and externally, to better align it with best practice principles in human rights.

Whistleblowers are protected if they come forward with a disclosure regarding modern slavery in the direct reporting system. Furthermore, we have bolstered awareness of the firm's expectations regarding human rights and modern slavery, both internally and externally, through comprehensive training and capacity-building initiatives.

Where reports of modern slavery or potential modern slavery come to our attention and an internal or external investigation finds that allegations within a complaint are substantiated, 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; 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 and addressed where required. 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 process is effective at identifying risks of modern slavery in Global Switch Australia's supply chain and whether the questions directed at suppliers pinpoint the possible risks.
- Processes – discuss with the employees to see whether the individual and assessment teams understand the procedures and processes for evaluating the 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 effectively reduce the risks of modern slavery in our supply chain over time.
- Outcomes – review the record of any cases identified and follow up with any victims to ensure appropriate remediation has been given.

## 7. FUTURE DEVELOPMENTS

Global Switch Australia recognises that the objectives identified in prior years' modern slavery statements cannot be achieved through a static approach but rather necessitate ongoing enhancement and review. Throughout the past year, we have made significant strides in strengthening our commitment to human rights, refining our management systems and controls, and enhancing grievance mechanisms and remedial actions.

In our upcoming reporting year, we aim to continue to refine and develop our approach to modern slavery compliance, including by building capacity within our business to identify new modern slavery risks in our current supply chain, updating policies and procedures for corrective actions, and collaborating with authorities and developing communication plans to ensure compliance with the



relevant legislation and our internal ethical obligations to our employees and the global community.

We will examine how we can improve the way Global Switch Australia communicates our policies, procedures, and ethical position against all aspects of modern slavery.

Global Switch Australia will continue to identify modern slavery risks that may be present in our operations and supply chains as part of the business's annual management review meetings. This will allow the business to evaluate improvements to risk assessment processes and identify high-risk suppliers.

Global Switch Australia will continue to review its policies and procedures to ensure that it has sound governance processes in place to meet its modern slavery compliance requirements.

## 8. CONSULTATION AND APPROVAL

This statement was developed in consultation with Global Switch Property Australia, Global Switch Australia Holdings, Global Switch Property Pty Ltd and Global Switch Australia Pty Ltd. As previously noted, each director of Global Switch Australia Holdings is either a director or company secretary of Global Switch Property Australia, Global Switch Property Pty Ltd and Global Switch Australia Pty Ltd. 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, Global Switch Australia Pty Ltd, Global Switch Property Pty Ltd and Global Switch Australia Holdings on 07 August 2024.

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Aug 8, 2024 | 16:36 AEST

Damon Reid

Director of Global Switch Property (Australia) Pty Limited, Global Switch Australia Pty Ltd, Global Switch Property Pty Ltd and Global Switch Australia Holdings Pty Limited