



Modern Slavery Statement

FINANCIAL YEAR 2022-23

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01. ABOUT THIS STATEMENT

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

Air Trunk Pty Ltd,
as trustee for AirTrunk Sydney Land Trust
ABN 89 561 908 089

AirTrunk Holding T1 Pty Ltd,
as trustee for AirTrunk Australia Holdings Trust
ABN 89 469 259 695

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), but which nonetheless intend to implement the key principles set out in this Modern Slavery Statement.

This statement is made in relation to the financial year commencing 1 July 2022 and ending 30 June 2023.

02. MESSAGE FROM THE CEO

The acceleration of artificial intelligence and machine learning is driving up demand for hyperscale critical digital infrastructure that can support these technologies. AirTrunk is responding to this demand by expanding our Asia-Pacific & Japan hyperscale data centre platform, with new data centre developments announced in the last 12 months in Hong Kong and Malaysia.

As we expand our platform, it is important that we do so sustainably and responsibly. We remain committed to acting ethically and with integrity and transparency in everything we do.

We uphold a zero-tolerance approach to modern slavery and continue to identify the best ways to mitigate the risks of modern slavery in the region. We expect the same standard from our employees, business partners, contractors and those across our supply chain.

Our efforts to ensure consistent and responsible management across our operations were recognised in FY23 when we were awarded a Platinum EcoVadis Sustainability medal.

EcoVadis benchmarks companies based on their sustainability management systems in the areas of Environment, Labor & Human Rights, Ethics and Sustainable Procurement.

This statement, which addresses the financial year 2022-23, sets out the steps we have taken to address our responsibilities under the Modern Slavery Act 2018 (Cth), and how we continue to enhance our practices to protect the human rights of our communities.

We can report that to date, AirTrunk has not identified any incidents of modern slavery in our operations or supply chain.



Robin Khuda
Founder and CEO

03. FY23 HIGHLIGHTS

During FY23, and since the end of the reporting period, AirTrunk is proud to have achieved certain milestones to minimise the risk of modern slavery in its business including:

01.	02.	03.
<p>Implementation of a supply chain assurance program, which includes enhanced due diligence processes in respect of new and existing partners and suppliers.</p>	<p>Maintenance of a cross-functional Modern Slavery Working Group, which monitors the risk of modern slavery across the business and reviews modern slavery risk as AirTrunk expands into new markets.</p>	<p>Roll out of our annual multi-tiered due diligence questionnaire to understand modern slavery approach, supply chain management and workplace conditions of our key suppliers.</p>

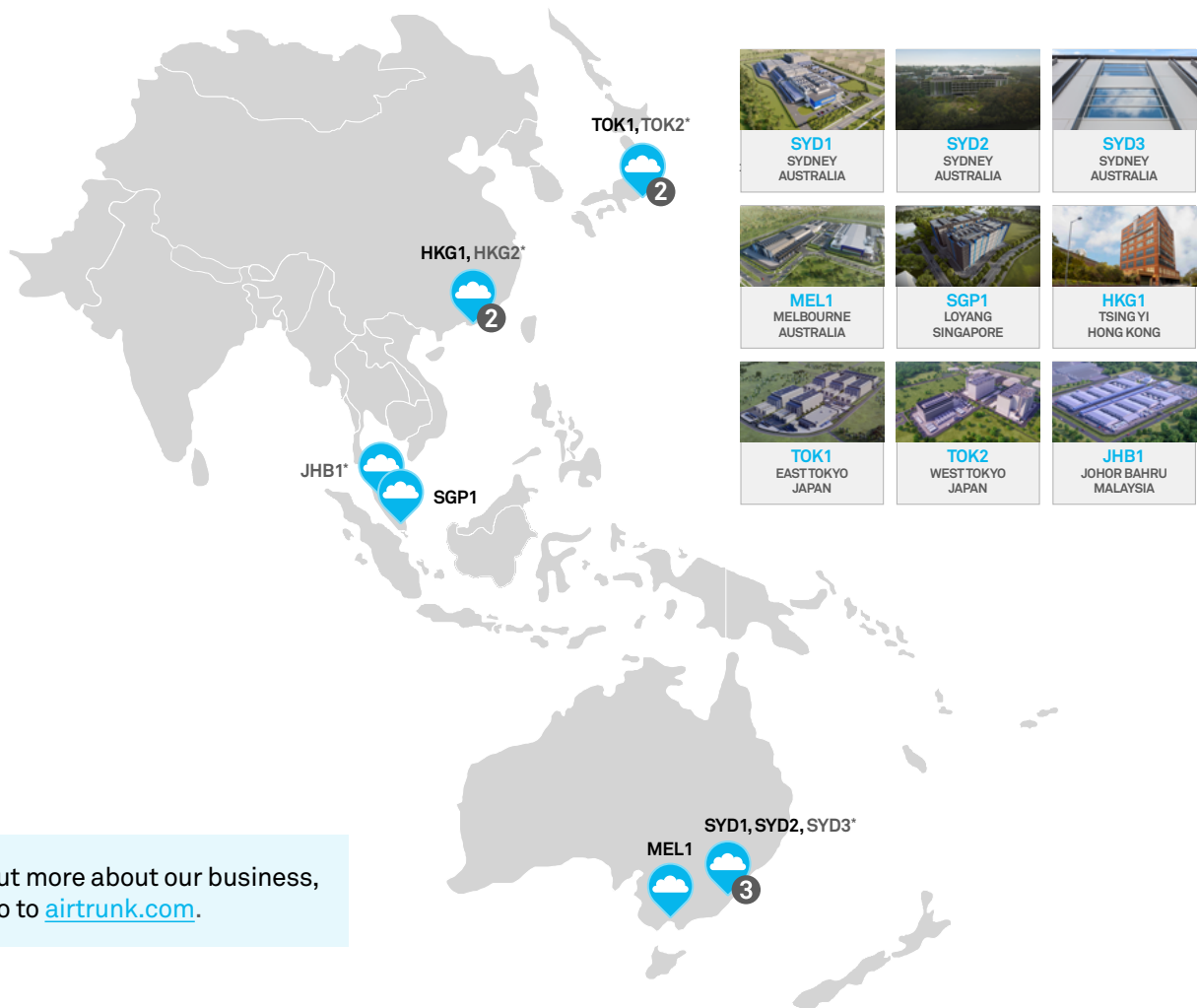
These milestones build on AirTrunk’s existing initiatives designed to minimise and mitigate modern slavery risk, as outlined in [Section 6: Addressing Modern Slavery Risks](#).

04. OUR BUSINESS

AirTrunk is a best-in-class hyperscale data centre specialist creating a platform for cloud, content and large enterprise customers across the APJ region. AirTrunk designs, develops and operates data centre campuses with industry leading reliability, technology innovation and energy and water 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, and has a data centre under development in Malaysia. As the largest independent hyperscale data centre operator in APJ (with 1.38GW capacity across the platform), AirTrunk takes its responsibility to protect its communities seriously.

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 and core business operations). AirTrunk has approximately 225 employees across APJ¹, and as these employees predominantly consist of highly skilled professionals engaged in accordance with local employment requirements, we consider this results in low modern slavery risk in our direct business operations.



To find out more about our business, please go to airtrunk.com.

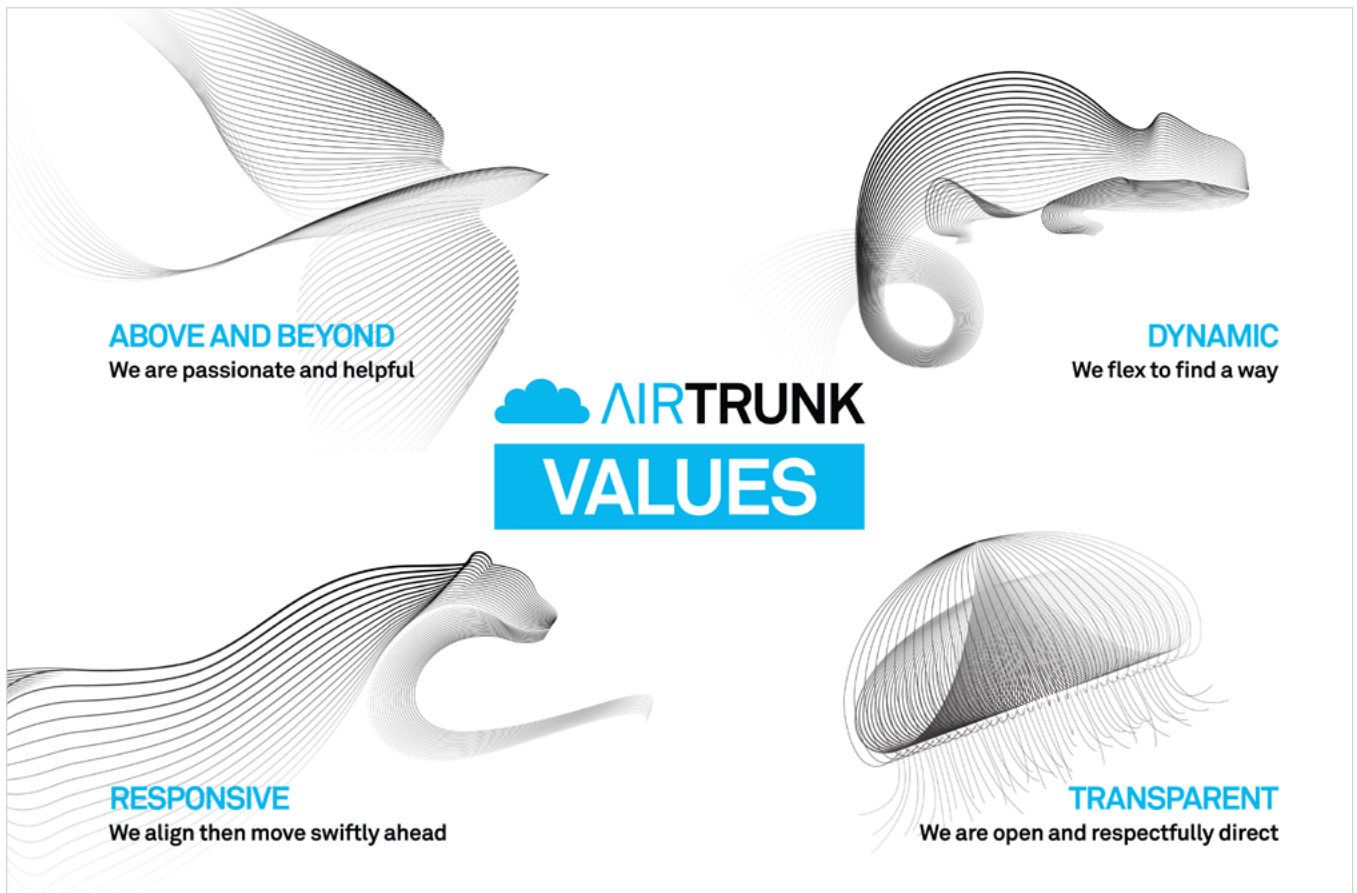
1 As at 30 June 2023.

* Under development

04. OUR BUSINESS

Our Purpose and Values

AirTrunk's purpose is to scale and sustain the relentless growth of APJ's digital future. Our purpose is underpinned by our company values.



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 APJ region.

Most of our procurement activities involve sourcing 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; and
- 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; and
- Security.

In FY23, 18 organisations accounted for 80% of our total spend on goods and services. The majority of those key suppliers and business partners are large multi-national companies with established governance structures and their own corporate social responsibility programs, including in relation to human rights and modern slavery². AirTrunk is committed to ensuring that its suppliers are taking action to address modern slavery risk (as discussed in [Section 6: Addressing Modern Slavery Risks](#)).

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

2 These key suppliers are headquartered in either Australia, Singapore, Japan, Europe or in the United States.

05. ASSESSMENT OF 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.

Similar to our risk assessment in prior years, we consider that AirTrunk has the following modern slavery risks in our business:

RISK	
01	AirTrunk has not yet conducted adverse media screening on 100% of its suppliers and also does not always have visibility or approval rights over our Tier 1 suppliers' sub-contracting arrangements.
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 procurement of related equipment exhibit comparatively higher modern slavery risks due to the vulnerabilities in those industries and, in some cases, the location of the activities.

AirTrunk acknowledges that the APJ region hosts the largest number of people in modern slavery, with an estimated 15 million people in forced labour³. Of the countries in which AirTrunk operates, Malaysia has the highest prevalence of modern slavery.

AirTrunk will continue to assess modern slavery risk on an ongoing basis, particularly where there are changes to its business, supply chains and geographic footprint, and is committed to ensuring it takes appropriate actions to address any risks identified – please see [Section 6: Addressing Modern Slavery Risks](#) for details.

³ [Walk Free Regional Findings](#).

06. ADDRESSING MODERN SLAVERY RISKS

To minimise and manage the modern slavery risks identified in AirTrunk’s business, AirTrunk:

FOCUS	ACTION
CORPORATE POLICIES	Maintains a suite of corporate policies communicating AirTrunk’s stance on modern slavery and human rights, including a Modern Slavery Policy, a Human Rights Policy and a Supplier Code of Conduct. These policies are reflective of modern slavery and other risks in AirTrunk’s operations and supply chains and are in line with AirTrunk’s risk management strategy and activities. These policies are reviewed periodically to ensure they remain appropriate and align with local requirements as AirTrunk enters new markets. These policies are made publicly available on AirTrunk’s website and communicated to suppliers as part of the onboarding process.
“SPEAK UP” CULTURE	Makes available an anonymous whistleblowing platform to ensure employees, contractors, suppliers and other business partners can anonymously raise modern slavery and other serious concerns appropriately. Reports can be made in English as well as in the local languages of the countries in which AirTrunk operates. This is supported by the AirTrunk Group Whistleblowing Policy publicly available on AirTrunk’s website.
SUPPLIER DUE DILIGENCE	Conducts robust supplier due diligence (as discussed further in the FY23 initiatives section below).
CONTRACTUAL REQUIREMENTS	Adopts contractual requirements, wherever possible, to ensure that suppliers have appropriate policies and procedures in place to address modern slavery risks and are legally obliged to inform AirTrunk of instances of modern slavery.
AWARENESS TRAINING	Delivers modern slavery awareness training to employees to ensure staff are equipped to identify modern slavery risks, via a compulsory training module made available to all staff and included as part of employee induction.
REMEDIATION PLAN	Maintains a modern slavery remediation plan to ensure any risks identified are addressed appropriately, with a ‘people focused’ approach to ensure that the wellbeing and fair treatment of any affected persons is always prioritised.

06. ADDRESSING MODERN SLAVERY RISKS

To further build upon the progress made in recent years and the practices outlined above, in FY23 AirTrunk has focused on:

- Implementation of a **supply chain assurance program**, which includes enhanced due diligence processes in respect of new and existing partners and suppliers;
- Maintenance of a cross-functional **Modern Slavery Working Group** to monitor the risk of modern slavery across the business and review modern slavery risk as AirTrunk expands into new markets; and
- Roll out of our annual **multi-tiered due diligence questionnaire** to understand modern slavery approach, supply chain management and workplace conditions of our key suppliers.

Implementation of Supply Chain Assurance Program

In FY22, AirTrunk identified the need for a supply chain assurance program to formalise and strengthen our supplier due diligence process to ensure we are engaging with suppliers of the highest quality, including from a risk perspective.

In FY23, the focus has been on implementing this program to ensure AirTrunk has a formalised procurement strategy and resilient supply chain. This has been supported by the expansion of a central procurement function to focus on supply chain responsibilities across the whole business.

Significant progress has been made in implementation of the supply chain assurance program during FY23. Initial implementation has focused on suppliers involved in the construction of our data centres (Development Suppliers).

We are pleased to report that 100% of all new Development Suppliers have been successfully vetted through our supply chain assurance program, and we are currently working to transition existing Development Suppliers onto the program. Implementation of the supply chain assurance program will continue to be a priority in FY24.

The supply chain assurance program will allow AirTrunk to:

- Onboard all suppliers, and manage existing suppliers, via a dedicated platform;
- Systematically identify and manage risk and compliance throughout the supplier lifecycle;
- Create and manage automated workflows to confirm compliance with AirTrunk's policies and standards and legal/regulatory obligations; and
- Screen suppliers against a multitude of data sources to identify legal, financial, ESG, cyber and regulatory risks.

Modern slavery risk will be addressed through the supply chain assurance program, via identification of higher risk suppliers based on Global Slavery Indices and ESG predictors. AirTrunk will also collect information from suppliers directly as part of the onboarding process which includes confirmation from suppliers that they comply with modern slavery laws, maintain appropriate supporting policies and are not aware of modern slavery incidents in their supply chain.

The supply chain assurance program will also encompass ongoing screening of suppliers for modern slavery risks through adverse media searches, ensuring that AirTrunk is made aware of any reported modern slavery incidents with respect to screened entities. AirTrunk has screened over 300 Tier 1 and Tier 2 suppliers to date, with no instances of modern slavery identified with respect to those entities.

06. ADDRESSING MODERN SLAVERY RISKS

Maintenance of Modern Slavery Working Group

In FY22, we established a cross-functional Modern Slavery Working Group, comprising members of the legal, procurement and risk teams.

In FY23, this group continued to meet monthly to develop and implement initiatives to monitor and reduce the risk of modern slavery in our business and review the modern slavery risk in the AirTrunk business as we grow into new markets. Key risks, and any emerging risks identified in this Modern Slavery Working Group, are escalated and discussed with AirTrunk's executive team as required. During FY23, the working group has supported the procurement function in implementing the supply chain assurance program, and with prioritisation of screening new suppliers based in Malaysia given the heightened modern slavery risk identified in that market. The working group also reviews responses to the annual due diligence questionnaire, including third-party screening results (as discussed below), and determines whether further engagement is required with the relevant suppliers.

Roll Out of Annual Multi-tiered Due Diligence Questionnaire

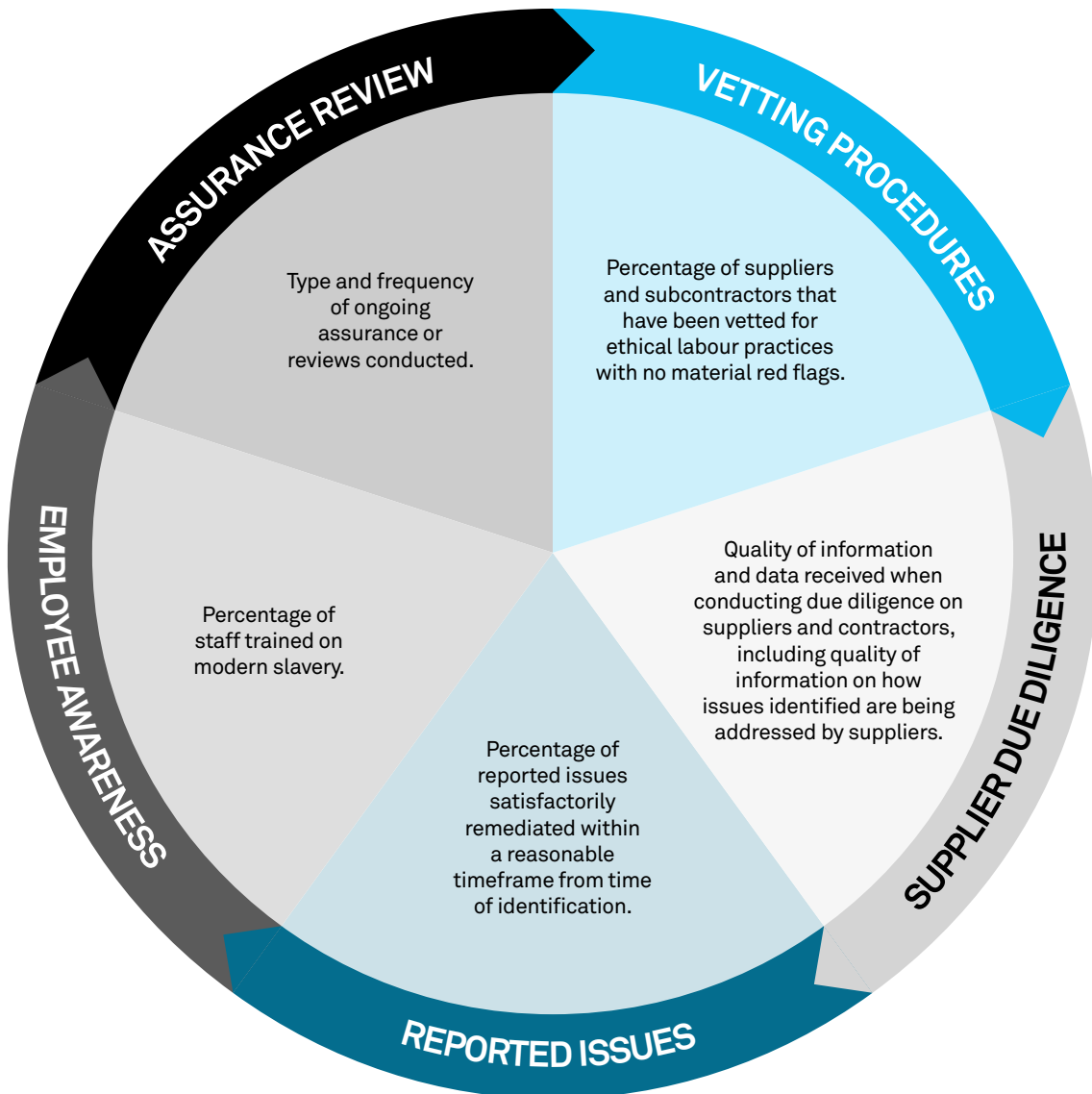
Consistent with previous years, AirTrunk rolled out an annual modern slavery questionnaire for our Tier 1 suppliers which represent in aggregate 80% of our total spend on suppliers (Key Tier 1 Suppliers). This provides AirTrunk with increased visibility over our Key Tier 1 Suppliers' approach to modern slavery, supply chain management and working conditions, and that of their key suppliers (our Tier 2 suppliers).

With respect to Tier 2 suppliers identified as part of the FY22 annual multi-tiered due diligence questionnaire, we screened those entities for any adverse media and confirm that no instances of modern slavery were identified.

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, UN Global Compact 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. All reporting entities are under common management and directorship.

The Statement was approved on 24 October 2023 by the Board of Directors of each of the AirTrunk entities named in [Section 1: About 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
01	Section 16(1)(a): Identify the reporting entities	01
02	Section 16(1)(b): Describe the reporting entities structure, operations and supply chains.	04
03	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
04	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
05	Section 16(1)(e): Describe how the reporting entity assesses the effectiveness of these actions.	07
06	Section 16(1)(f): Describe the process of consultation with any entities the reporting entity owns or controls.	08
07	Section 16(1)(g): Include any other information which the reporting entities consider relevant.	N/A

