

STACK Infrastructure Australia

Inaugural Joint Modern Slavery Statement

2025



Statement Verification and Approval

This Inaugural Joint Modern Slavery Statement covers reporting entities outlined in Part 1 of this Statement. This statement was prepared in consultation with each reporting entity.

This Statement was approved on 30 June 2026 by the Board of Directors of the entities named in Part 1 of this Statement.

The contents of this Statement have been reviewed and confirmed as accurate by a duly authorised person for each of the reporting entities, pursuant to the requirements of the Modern Slavery Act 2018 (Cth).

A handwritten signature in black ink, appearing to read 'Pithambar Gona'.

Pithambar Gona

CEO, STACK Infrastructure APAC

Date: 30 June 2026

Reporting Entity – Structure, Operations and Supply Chains

This joint modern slavery statement covers STACK Infrastructure Australia (Palmers Road) Unit Trust (ABN: 54619229947) STACK Infrastructure Australia Pty Ltd (ACN: 650472236) and the following controlled entities:

Trustee / Operating Entity	Trustee ACN
STACK Infrastructure Australia (Palmers Road) Pty Ltd	649 008 024
STACK Infrastructure Australia (Wangara) Pty Ltd	654 729 192
STACK Infrastructure Australia (Endeavour Industry Park) Pty Ltd	651 958 413
STACK Infrastructure Australia Top Pty Ltd	649 007 330
STACK Infrastructure Australia Mid Pty Ltd	649 007 723
STACK Infrastructure Australia (369 Palmers Road) Pty Ltd	673 257 219
STACK Infrastructure Australia (369 Palmers Road) Holdco Pty Ltd	673 253 980
STACK Infrastructure Australia (411 Palmers Road) Pty Ltd	680 967 408
STACK Infrastructure Australia (411 Palmers Road) Holdco Pty Ltd	680 834 333
STACK Infrastructure Australia (78 Lockwood Road) Pty Ltd	683 088 495
STACK Infrastructure Australia (78 Lockwood Road) Holdco Pty Ltd	683 081 129
STACK Infrastructure Australia (1005 Boundary Road) Pty Ltd	688 563 877
STACK Infrastructure Australia (1005 Boundary Road) Holdco Pty Ltd	688 558 974

(referred to throughout this Statement as “STACK”, “we” and “our”)

STACK only became a mandatory reporting entity under the *Modern Slavery Act 2018* (Cth) (the ‘Act’) during 2025, which is the calendar year reporting period covered by this, our inaugural, Modern Slavery Statement.

STACK’s principal governing body is its Board of Directors.

All owned/ controlled entities are subject to all aspects of STACK’s developing anti-slavery response and were consulted in relation to the preparation and contents of this Statement.

Operations

STACK is a leading data centre company, offering digital infrastructure solutions, including hyperscale campuses, wholesale colocation, to support rapidly growing enterprises and hyperscale companies.

Our Australian head office in year 2025 is located in Melbourne, Victoria (Level 14, 627 Chapel St, South Yarra).

STACK’s operation for the year 2025 is comprised of our MEL01A&B data centre located in Truganina, Victoria.

All aspects of STACK’s physical business operations in Australia occur exclusively within Australia.

STACK’s Workforce

STACK’s workforce in Australia comprises approximately:

- 72 employees directly employed; and
- 43 workers engaged through third-party service providers.

Supply Chains

STACK’s supply chain comprises direct (1st tier) supplier engagement with approximately 166 unique companies in the reporting period. The majority (approximately 98%) of our first-tier suppliers are Australian-based companies.

Our Australian-based suppliers provide products and services across the following key categories:

- Construction work
- Retail trade and repair services
- Wholesale trade and commission trade services
- Fabricated metal products
- Electrical machinery and apparatus
- Cement, lime and plaster
- Hotel and restaurant services
- Other business services

Identifying, Assessing and Addressing Modern Slavery Risk

STACK was not made aware of any actual or suspected incidences of modern slavery being reported or otherwise detected in our supply chains or operations during the reporting period.

Supply chains

Our foundational assessment of modern slavery risk in our supply chains has utilised a third-party platform and consultants to conduct a spend-based risk assessment of modern slavery risk in our supply chains. Through proprietary methodology that enables automated and comprehensive classification of STACK's overall procurement spend, suppliers are classified by sector (industry and country), and sectors are then ordered by risk profile. Sectorial risk is determined by reference to the leading current estimates of modern slavery incidence at national and industry levels, and accounts for both operational and supply chain risk within a particular sector.

The resulting output from the risk assessment includes a comprehensive breakdown of areas of (relatively) elevated risk in our complete value chain, down to the tenth (10th) tier, grouped on a sector/country basis, and broken down into practical categories such as total overall spend and ranked sectoral risk.

For the period ending 2025, no suppliers with high or moderately high modern slavery risks were identified through the risk identification process. A small fraction of suppliers was categorized as potentially having moderate or moderate low risk. We will focus our mitigation efforts on these suppliers and continue to monitor ongoing supplier risk and work with our suppliers in 2026 and beyond.

With this being our first reporting period under the Act, our initial focus has been on identifying and assessing potential modern slavery risk, along with the initial development and implementation of policies and procedures to ensure our key procurement activities are appropriately taking into account areas of potentially elevated modern slavery risk.

Operations

STACK considers our operational risk of modern slavery to be low. Factors underpinning this assessment include that our operations are entirely Australian-based and the majority of our workforce are directly employed and highly qualified professionals. Individuals engaged in the sector in which we operate are protected by extensive labour laws and highly regulated employment practices.

Foundational Steps for STACK's Modern Slavery Response Framework

Governance & Policy

STACK's Board retains ultimate oversight over the continuing development and implementation of our anti-slavery response. Day-to-day ownership of developing and implementing STACK's emerging modern slavery due diligence and risk mitigation framework, including the preparation of our inaugural Statement under the Act is primarily within the scope of our Finance, Legal, and Procurement teams.

STACK has implemented an overarching policy and governance framework, including Environmental, Social, Governance (ESG) Policy and a Responsible Contractor Policy. The scope of these policies extends beyond modern slavery mitigation and helps strengthen STACK's overall risk mitigation framework in promoting ethical, lawful and responsible business practices across the supply chain, including in relation to labour rights and responsible sourcing.

We recognise that an effective policy and governance suite for responding to modern slavery risks should not be "set and forget". Accordingly, STACK is committed to remaining up-to-date with industry trends across all key pillars of a holistic response framework and will seek to continuously improve as reporting journey progresses.

Supplier Due Diligence and Engagement

STACK implements structured and formal processes of new supplier screening and onboarding that is designed to ensure that the companies from which we procure goods and services conduct business in a manner that is ethical, lawful and complies with all applicable regulations. From the tender (pre-engagement) phase through the full life-cycle of the supplier relationship, our intention (and future focus) is on implementing continually improving governance, policy, due diligence and procurement management systems that provide a contextually appropriate means of assessing and addressing relevant modern slavery risks.

STACK understands that, at an industry-wide level, and particularly where international recruitment and/or foreign operating locations are involved, the use of third-party labour hire agencies can substantially elevate potential modern slavery risks. None of these general underpinning risk factors are applicable to STACK's use of these services for our own workforce.

STACK only engages leading global multinationals that have been comprehensively reporting on its approach to identifying, assessing and addressing modern slavery risk since the Modern Slavery Act 2018 (Cth) commenced operation. Our independent advisor reviewed the companies' most recently published Modern Slavery Statements and confirmed that there are numerous attributes of modern slavery risk mitigation, including:

- A holistic policy, governance and remedial framework, with a long-term track record of implementation.
- An extensive due diligence framework including on-site audits and third-party due diligence of assessed high-risk suppliers.
- Comprehensive descriptions and explanations of concrete, practical actions relating to each of the Act's mandatory reporting criteria, with demonstrated continuity in following-through with planned actions across successive reporting periods.

As we progress beyond our first reporting period, STACK plans to pursue enhanced and targeted due diligence on suppliers flagged as having potential elevated modern slavery risk exposure, where required. Identified potential focus areas that have a significant nexus to our operations and key purchases include:

- Building and construction – including the development of additional data centres as our business continues to grow and expand.
- Premises cleaning and security services
- Continuing monitoring and supplier engagement to ensure that third-party labour hire systems are ensuring full workforce protection.
- Staff uniforms and workwear – including cotton-based apparel.

Grievance and Remediation

STACK recognises the vital importance of potentially vulnerable workers in our operations and supply chains being able to safely and appropriately report concerns or complaints of a full-range of human rights issues, including those relating to potential modern slavery practices. This is achieved through the operation of our Code of Conduct which encourages reporting of complaints and outlines formal procedures to investigate and respond to reports of suspected wrongdoing.

Planned Approach for Measuring Effectiveness and Looking Forward

As this is STACK's first reporting period, we have not yet completed the development of a formal framework to measure the effectiveness of our newly introduced actions to identify, assess and address modern slavery risk.

STACK recognises the importance of developing specific key performance indicators (KPIs) for tracking, measuring and assessing the actions taken to mitigate modern slavery risk. The longer term process of developing of a formal measuring effectiveness framework covering the following key pillars of an overall modern slavery response is planned for the next reporting period:

- Policy and Governance
- Risk Assessment
- Due Diligence and External Engagement
- Internal Training and Education

STACK's current plans for 2026 (and beyond) include the continued development and improvement of our anti-slavery response, including through focus on:

- Targeted and contextually appropriate supplier-specific due diligence and partnership with risk-based selection from within the assessed priority areas described above, including the Australian building and construction, security and cleaning services, and staff uniforms.
- Internal training on specialist modern slavery content, specifically tailored to our operating and procurement profile, with an initial focus on our Board and Executive team, and frontline positions in procurement.