



Modern Slavery Statement

Vantage Data Centers supports and promotes the elimination of human trafficking and modern slavery throughout businesses and supply chains. This statement sets out our commitment to preventing slavery and human trafficking in our business activities and the steps we are taking to meet this commitment

Organizational Structure and Supply Chain

Vantage Data Centers is a global provider of wholesale data center campuses, powers, cools, protects and connects the technology of the world's well-known hyperscalers, cloud providers and large enterprises. Vantage engages employees, suppliers and service providers to support the acquisition, construction and operations of data centers globally.

Policy Statement

Vantage strictly prohibits unlawful child labor, prison or forced labor, human trafficking, and physical punishment in accordance with the Vantage Code of Conduct, the Supplier Code of Conduct and our core values of transparency and accountability.

Vantage employees, suppliers, contractors, subcontractors and others with whom Vantage does business are prohibited from participation in any practice that constitutes human trafficking or slavery. This includes, but is not limited to:

1. Engaging or knowingly aiding and abetting in any form of trafficking in persons
2. Procuring commercial sexual acts during working hours, while traveling on business, while attending off-site working functions, or in any situation in which the acts may be directly associated with Vantage
3. Using forced labor of any kind for any reason
4. Destroying, concealing, confiscating or otherwise denying an individual access to the individual's identification or immigration documents
5. Using fraudulent practices to recruit candidates for employment or contract positions such as failing to disclose basic information about important terms and conditions of the position, such as wages, fringe benefits, workplace location, living and working conditions, or any significant costs to be charged to or born by the candidate
6. Using recruiters that do not comply with local labor laws of the county in which the recruiting takes place
7. Charging applicants candidate recruitment fees
8. If required by law or contract, failing to provide or pay for return transportation at the end of employment
9. If required by law or contract, failing to provide or arrange for housing that meets the housing and safety standards of the host country



10. If required by law or contract, failing to provide an employment contract, recruitment agreement or other required document in writing
11. If required by law or contract, failing to provide legally required and/or mutually agreed compensation and welfare
12. Providing accommodations and/or employment for unauthorized entrants to the jurisdiction

Policy Implementation

Risk Assessment

Periodically, Vantage conducts risk assessments to identify areas where our business and supply chain may be vulnerable to human trafficking and slavery.

Supplier Due Diligence

All suppliers are required to adhere to the Vantage Supplier Code of Conduct, which prohibits any practice that would constitute human trafficking or slavery. Before the engagement, due diligence is conducted to identify and address human trafficking and slavery risks of all high risk suppliers.

Employee Training

All employees are trained on the requirements of the Vantage Code of Conduct. Employees responsible for procurement of materials, services and products are given additional training to enable the completion of risk assessments, due diligence activities and the identification of red flags.

Reporting

Employees and suppliers are required to report any violation or suspected violation of law or the Code of Conduct, which prohibit human trafficking and slavery. Such reports can be made to manager, contract manager or relationship manager, Human Resources, Corporate Compliance or the Vantage Whistleblower Hotline.

Monitoring and Enforcement

Vantage will conduct audits and perform investigation to verify compliance with this policy. All employees and third parties are required to cooperate fully with any such audit or investigation. Failure to participate, cooperate, or any actions taken to hinder an audit or investigation will result in the termination of employment or the third-party relationship.



Board Approval

The Vantage Data Centers Board of Directors approved this statement on 05/05/2022

A handwritten signature in blue ink, appearing to read "S. Choksi", is written over the text.

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