

2022 MODERN-DAY SLAVERY STATEMENT

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Introduction

This statement is made in line with the requirements of the UK Modern Slavery Act 2015 outlines the actions taken by Yondr to build our resilience to the risk of modern-day slavery in the financial year of 2022. We conduct our business in a responsible and ethical manner. Yondr is opposed to modern-day slavery and human trafficking in all forms. We recognise that modern slavery is a global and complex issue and we are committed to contribute our part towards supporting its elimination. We expect all of our suppliers to adopt this opposition as outlined in our supplier code of conduct.

We are committed to protecting human rights both within our own operations and in our global supply chain in accordance with the Yondr values:

- / As **Quiet Heros** - we have a deep commitment to the fulfilment, progression and well-being of others, delivered with humility and generosity.
- / As **Candid Friends** - we have a strong conviction that open dialogue, frank discussions and active listening lead to better solutions.
- / As **Everyday Inventors** - we have an unrelenting desire to make things better, to challenge convention, and to apply creativity to solve problems.

- / **As Focus Explorers** - we have an everyday dedication to driving efficiency, conserving time and resources, and simplifying complexity.

In this context, addressing modern slavery aligns with all of these values. We acknowledge that we are at the start of our journey in tackling the risks of modern-day slavery in our business and supply chain. We adopt a continuous improvement environment, regularly reviewing local, regional and global legislation to ensure our alignment. Furthermore our continued partnership with Slave-Free Alliance helps us to embed practices that go beyond legislation.

Organisation structure and supply chains

Yondr Group is a global developer, owner operator and service provider of hyper-scale data centre facilities. We deliver complex data center capacity needs for the world's largest tech companies. This is enabled by working with a small network of strategic partners and/or joint ventures, as well as with a variety of suppliers. Our supply chain can be complex; there are often many tiers of suppliers between our general contractor and the source of labour we use when constructing a datacenter.

Our supply chain consists of suppliers of goods as well as services, such as design and construction and consultancy services. We work with general contractors on our project sites. Typically, a construction site can consist of thousands of workers. Once the construction is completed, we move to the phase of operations where the number of subcontractors is drastically reduced.

Our business activities are spread across the globe, having offices in Europe, the Americas and the Asia Pacific region. Our total number of employees is approximately 240 worldwide. We currently have project sites in each of these regions.

Policies in relation to slavery and human trafficking

Yondr has established the following policies to outline our standards and our approach to manage our risk of inadvertently supporting modern-day slavery through our operations.

- / [Labour and Human Rights Policy](#)

In 2022, we updated our Labour and Human Rights Policy to state our zero-tolerance approach to all forms of modern-day slavery and human trafficking, including child labour. Include definitions of modern-day slavery and child labour in relation to hazardous work. It



also describes the high-level actions we have in place to respect international human rights as well as the approach taken should violations be discovered within our supply chain.

/ [Supply Chain Code of Conduct](#)

In 2022, we also updated our Supply Chain Code of Conduct to hold our suppliers to the same standards outlined in our Labour and Human Rights Policy. We set out minimum standards in relation to child labour and modern-day slavery and included a duty to report any actual or suspected unethical or illegal conduct to Yondr. Suppliers who we have significant expenditure with or who will be working on our project sites must have agreed to our supply chain code of conduct before being submitted into Yondr's supply chain.

/ [Speak Up Policy](#)

This policy encourages our employees as well as third parties to raise any concerns, including (a suspicion of) modern-day slavery in relation to our business activities. This extends to our supply chain and is promoted through the supply chain code of conduct.

Risk assessment and management

Yondr is partnered with Slave-Free Alliance, an alliance set up to work in collaboration with businesses to develop a proactive strategy for businesses and their supply chains to be resistant to the threat of modern-day slavery.

We worked with them to deliver a gap analysis of Yondr to assess and evaluate our potential exposure to the risk of modern slavery, understand the corporate response required to mitigate the risk, and to identify the actions required to ensure continuous improvement in this area of the business.

It was identified by Slave-Free Alliance in Yondr's gap analysis, that as all direct employees are paid above living wage and due to the thorough scrutiny during the recruitment process, there is a substantial degree of assurance that incidents of modern slavery are unlikely to occur in our direct employee base. Therefore, our approach centres around the identification and management of modern-day slavery risk in our supply chain.

We have developed a robust escalation process that focuses on the safeguarding of victims in a potential modern-day slavery incident. This includes a risk assessment to correctly identify the type and risk level of the incident, which will enable the appropriate



process to be adopted in response. Our next step is to implement this process across our projects. Our escalation process will be subject to ongoing review to allow for it's continued evolution in line with our learnings as a business, legislative change and best practice.

Due diligence processes

Suppliers who we have significant expenditure with or who will be working on our project sites must complete a pre-qualification questionnaire as part of their onboarding. This questionnaire includes a section designed to assess the supplier's resilience to the risk of modern-day slavery depending on where the activities will take place. The supplier is only approved and submitted to the Yondr supply chain if the answers they provide meet our criteria.

As Yondr expands into different markets, we will collect data in each new country regarding modern-day slavery risk to inform decision-making and due diligence measures. We work together with consultants with expertise in the field, to ensure we understand the local legislation, also with regards to labour law requirements and use these country risk assessments to understand what we need to do before entering into a new jurisdiction.

Key performance indicators to measure the effectiveness of steps being taken

Yondr has partnered with Slave-Free Alliance to build our understanding of modern slavery risk and to develop a holistic approach to address these risks. Slave-Free Alliance conducted a gap analysis of our existing modern slavery provisions. Establishing KPIs will support the implementation of this review's recommendations and help to embed modern slavery mitigations into the DNA of Yondr, in line with core values and supporting the sustainable growth of the organisation.

Our focus over the last year was on updating our policies and processes by including the risk of modern slavery. Yondr is currently revising both its Sustainability and Supply Chain Strategy. Going forward, modern slavery will be part of these strategies, including key performance indicators.



Training on modern slavery and trafficking

Yondr Group has conducted a training needs analysis with Slave-Free Alliance to determine where our training and awareness-raising efforts need to be directed, including at executive, management and operational levels. Following the recommendations of this training needs analysis, we focused on increasing company awareness of the signs of modern-day slavery, delivering a company-wide webinar and sharing information resources through our internal communications platform.

As part of the rollout of our escalation process, we will deliver role-specific training on a project level.

We are members of the Supply Chain Sustainability School, an online learning platform focused on providing sustainability education for the construction industry. Using this platform we have encouraged our employees to participate in courses to improve their knowledge regarding modern-day slavery.

Yondr Group Limited

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This statement has been approved by the Yondr Group Limited Board of Directors for the financial year 2022, in compliance with the UK Modern Slavery Act.

