

2023 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, it outlines the actions taken by Yondr to build our resilience to the risk of modern-day slavery in the financial year of 2023. We conduct our business in a responsible and ethical manner. Yondr is opposed to modern-day slavery and human trafficking in all forms, and we are committed to doing our part to contribute to its elimination. Yondr's zero tolerance approach extends to our supply chain, and we require our suppliers to adhere to the requirements of 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 partnership with Slave-Free Alliance has helped 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 through the establishment of a global supply chain of varied suppliers from strategic partners, small and medium sized enterprises, and/or joint ventures. Given our global outlook and scale, our supply chain can be complex with many tiers of suppliers and subcontractors working under our major delivery partners in the construction and operation of a data center.

Our supply chain consists of suppliers of complex goods and services including specialist design services, consultancy, equipment, construction and facilities management providers. We work with general contractors on our major project sites with the key build phases consisting of a large managed workforce. Upon completion of the construction phase, the data centre is brought into operational use and the resourcing requirement is reduced significantly.

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 200 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 clearly outline our approach, standards and requirements in relation to modern-day slavery risks throughout our operations and supply chain.

/ [Labour and Human Rights Policy](#)

Yondr's Labour and Human Rights Policy states our zero-tolerance approach to all forms of modern-day slavery, human trafficking, and child labour. The policy includes clear definitions of modern-day slavery and child labour and 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.

/ [Supplier Code of Conduct](#)

Our Supplier Code of Conduct holds our suppliers to the same standards outlined in our Labour and Human Rights Policy and extends our zero-tolerance approach in relation to child labour and modern-day slavery. Furthermore, it includes a duty to report to Yondr any actual or suspected unethical or illegal conduct. Suppliers are required to confirm adherence to our Supplier Code of Conduct as part of a wider due diligence process in order become a supplier to Yondr.

/ [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 Supplier Code of Conduct.

Risk assessment and management

Yondr 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 in 2022, 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 implemented three different checks of migrant workers within our Health and Safety inspections.

In a standalone Migrant Worker SpotCheck where we ask migrant worker questions about their work benefits, their living space and pay.

In the Workers Camp Inspection we check if the living space of the migrant workers is up to standard.



Part of the Monthly Construction HSE Inspection is a check of the migrant worker recruitment process, information provided, resources available and training provided.

Due diligence processes

Yondr uses a bespoke compliance platform for supplier onboarding and ongoing assessment. Through this platform, all Yondr suppliers are required to provide minimum compliance information based on the goods/services being provided, which is assessed by relevant subject matter experts within Yondr. Where required, this would include specific questions and compliance information related to their approach, policies and credentials for the employment, safe management and fair treatment of their workforce and supply chain. Suppliers would also be required to provide a declaration of any sanctions levied against them.

Through the compliance platform, suppliers would also be required to confirm their adherence to the Yondr Supplier Code of Conduct, which covers our minimum requirements to labour and human rights as well as health and safety, anti-bribery and corruption, gifts and gratuities, unfair business practices, whistleblowing, data privacy and freedom against prejudice and discrimination.

Additionally, for higher risk/value/complexity requirements, Yondr also utilises specialist external sanctions checking tools to undertake enhanced screening reports on selected suppliers, as required.

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 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.



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.

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.

DocuSigned by:

Paul Hood

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Yondr Group Limited

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Date: 28 June 2024

This statement has been approved by the Yondr Group Limited Board of Directors for the financial year 2023, in compliance with the UK Modern Slavery Act.

