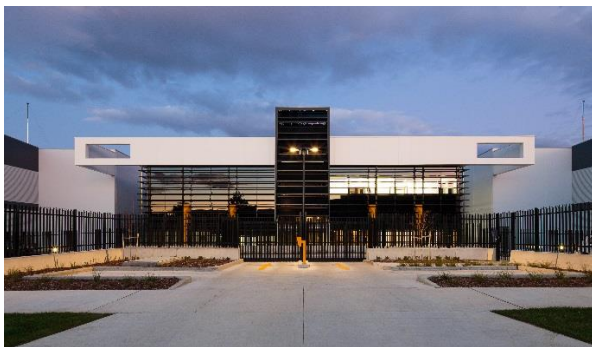




CANBERRA DATA CENTRES PTY LTD



CDC Supplier Code of Conduct

Version: 1.0
August 2020

CDC Data Centres (**CDC, us, we, our**) is committed to socially responsible, professional, and ethical business practices. This Supplier Code of Conduct (the **Code**) highlights CDC's expectations of our suppliers, contractors, and service providers (each, a **Supplier, you, your**).

CDC operates state of the art data centre facilities for government, national critical infrastructure and hyperscale clients – ensuring the continued, uninterrupted operation of these facilities is of utmost importance. Equally, our reputation for continually meeting our client requirements and expectations in a professional and ethical manner is a standard we expect each of our Suppliers to embody.

This Code sets out some of the key issues Suppliers must be aware of, and maintain vigilance towards, as a partner of CDC.

Corporate Governance and Ethical Business Practices

As a Supplier of CDC, you are expected to:

- (a) comply with all applicable laws and regulations on bribery, corruption and prohibited business practices, (including maintaining policies and appropriate internal controls to safeguard against such behaviour);
- (b) conduct your business in an ethical, fair and courteous manner;
- (c) report to CDC on elements identified in this Code and allow CDC to undertake necessary due diligence (including, where applicable, conducting audits) to verify compliance with this Code and the representations made by Supplier;
- (d) provide timely and balanced disclosure to CDC of any ethical, legal, social, and environmental infringements that may adversely affect supply of the goods or services delivered to CDC, or could expose CDC to reputational damage; and
- (e) adhere to, and enforce, acceptable business practices in your engagements with your own suppliers, including (but not limited to) binding such Suppliers to the standards outlined in this Code.

Modern Slavery/Labour Conditions/Human Rights Obligations

Both in Australia and around the globe, eradicating modern slavery practices in commerce is of the highest priority for both governments and the international business community alike. Modern slavery practices are major violations of human rights and are considered to be serious crimes. Such practices include human trafficking, slavery, slavery-like conditions (including forced labour) and child labour. The risk of modern slavery is even greater for businesses like CDC who have extensive and complex supply chains.

The below sets out our expectations in terms of conduct within your businesses as well as management of your own supply chains.

Child labor: Children under the age of 15 are not to be used for any form of work and children under 18 are not to be employed in hazardous working conditions.

Forced/slave/involuntary labor: Suppliers are expected to ensure that:

- (a) employment is freely chosen;
- (b) there is no forced, bonded or involuntary prison labour;
- (c) workers are not required to lodge deposits or their identity papers with their employer and are free to leave their employer after providing reasonable notice; and
- (d) policies and practices are in place to allow violations, misconduct, or grievances to be reported by workers and addressed without fear of reprisal.

Working hours: Workers shall not work hours exceeding reasonableness each week or the regular and overtime hours permitted by the applicable local laws (whichever is less).

Fair wages/benefits: Workers must be paid at least the minimum wage required by the applicable local laws and provide all legally mandated benefits including (but not limited to) annual leave, sick leave, bereavement leave and applicable premium rates for overtime. Deductions from worker wages must not be implemented as a disciplinary measure.

Discrimination: Workers shall be employed, promoted and compensated based on their ability to perform their job rather than on the basis of gender, race, religion, age, sexual orientation, pregnancy, marital status, political affiliation, union membership, social association, ethnicity or any other status protected by applicable local laws or custom.

Harassment and disciplinary practice: Workplaces shall be free of harassment and workers shall not be subject to any form of harsh or inhumane treatment, including (but not limited to) sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse.

Freedom of association: Workers rights to join and organise associations of their own choosing and to bargain collectively must be respected without fear of reprisal.

Supplier shall comply with all relevant modern slavery requirements as prescribed by the *Modern Slavery Act 2018* (Cth) and ensure that any of the Supplier's subcontractors are aware of, and adhere to, such requirements.

Health & Safety

We consider the health and safety of both our employees, our clients as well as the employees of our Suppliers to be of the utmost importance. Therefore, our expectations of the workplace conditions you implement for your employees are set out below.

Workplace and Occupational safety: Suppliers are expected to provide a safe and healthy workplace and adequate procedures to prevent accidents and injury while performing work-related duties. You must have implemented evacuation procedures, training and drills, appropriate first aid supplies, fire detection and suppression equipment and any other health and safety measures as mandated by law, or would be reasonably expected of businesses in your line of work.

Housing and living conditions: Workers shall (as a minimum) have access to clean toilet facilities, clean water, appropriately sanitised food preparation areas and storage facilities. Any dormitories or accommodation type facilities provided by you must be clean, safe with adequate heat and ventilation and reasonable personal space.

Hazardous substances: Supplier must post material safety data sheets in the primary language of workers and train workers in the labeling, safe handling, use and storage of any hazardous materials.

Environment

Supplier shall take the necessary precautions and comply with local and international environmental and other laws and other regulation relating to emissions, solid and wastewater disposal, and proper use and disposal of hazardous substances.

Security

CDC requires Supplier to comply with CDC's security procedures, including (but not limited to) the CDC Personnel Security Policy, Escorting Policy, Security Access Procedures, and Information Classification Policy. The most current version of these can be provided upon request and may be redacted for confidentiality purposes.

Further, we require Suppliers to implement information security policies of their own to protect CDC information they might hold.

Community

Supplier is encouraged to engage directly, or through partnerships, in projects that improve the social well-being of employees and their families in the local community.

Implementation and Documentation

CDC requires Supplier to understand and comply with the Code. Upon receiving the Code, Supplier shall send certification in writing to CDC that its contents are understood and will be complied with. Supplier shall retain documentation needed to demonstrate compliance with this Code and provide CDC or CDC's representatives with reasonable access to such documentation and Supplier's facilities for auditing purposes, with appropriate confidentiality measures in-place to protect privacy.

Further, Supplier shall conduct training (at least once per annum) for its managers and employees to ensure comprehension and compliance with the contents of the Code, applicable laws, and regulations and generally recognised best practice standards. Suppliers are required to employ a process and management system for communicating obligations, training all employees and agents working on CDC matters, and tracking compliance with the Code and the law. Training records should be documented and made available to CDC for audit upon request.

Reporting Requirements

Supplier is required to report to CDC where it has breached, or suspects breach, of this Code. Further, a report must be made to CDC if Supplier becomes aware, or is suspicious of, such a breach by a subcontractor. Reports may be lodged with your regular CDC liaison, or through our Whistleblower hotline service. You are strongly encouraged to disclose any actual or suspected breach to your manager AND your regular CDC liaison, or to CDC's General Manager, Legal & Risk, or the CFO.

However, if you have any concerns or hesitation in disclosing conduct in this manner, there are a number of alternative channels available to you (all of which can be done anonymously, if you choose) facilitated via a third party service provider, PKF. They are as follows:

- (a) **Phone** – You can call the Ethics Hotline – **1800 497 081** – where you can speak to a trained professional who can take down details of the Reportable Conduct. This is a toll-free and confidential service.
- (b) **Email** – You can send a secure email cdcdchotline@pkf.com.au.
- (c) **Web Portal** – We have a dedicated secure web portal through which you can make disclosures which you can access here: www.talkintegrity.com/cdcdc/.

CDC shall maintain confidentiality of the contents of, and parties involved in a report to the highest extent possible. Further, CDC objects to any retribution or retaliation taken against any individual who has, in good faith, sought out advice or reported questionable behavior or possible breach of the Code.

CDC prides itself on having a reputation of operating secure, environmentally sound, reliable and ethical business. We expect our Suppliers to adopt this approach to develop highly valued long-term relationships. We believe in open and honest communication and seek to work with you to assist in maintaining compliance with this Code.