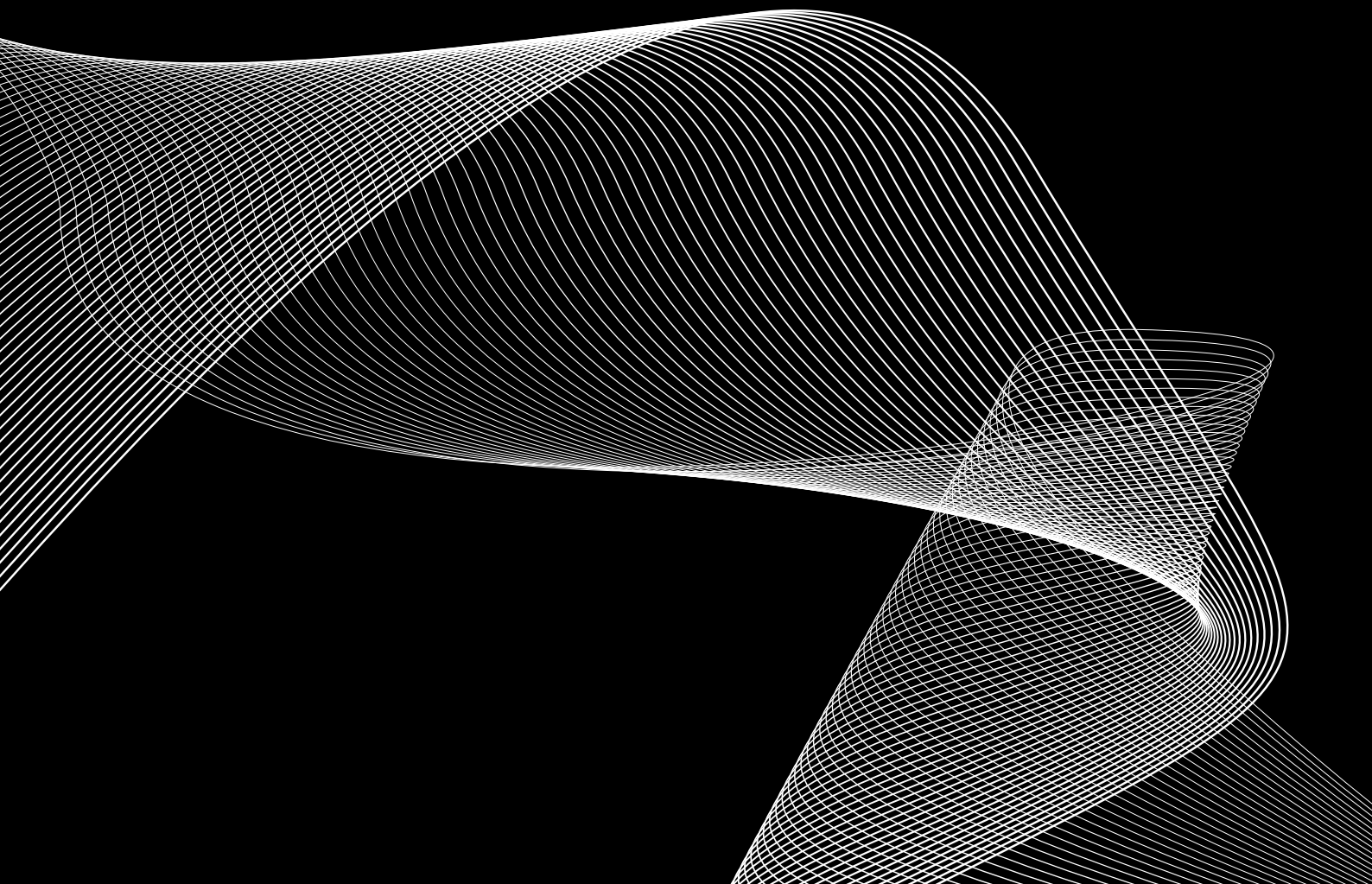




Modern Slavery Statement

FINANCIAL YEAR 2024-25



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01. ABOUT THIS STATEMENT

This Modern Slavery Statement is jointly made by the following entities across the AirTrunk Group:

Air Trunk Pty Ltd,
as trustee for AirTrunk Sydney Land Trust
ABN 89 561 908 089

AirTrunk Pty Ltd
as trustee for AirTrunk Melbourne Land Trust
ABN 36 134 928 636

AirTrunk Holding T1 Pty Ltd,
as trustee for AirTrunk Australia Holdings Trust
ABN 89 469 259 695

Andante Holding Company Pty Limited,
as trustee for Andante Holding Trust
ABN 57 334 256 317

Amidala AU Bid TC Pty Ltd
as trustee for Amidala AU Bid Trust
ABN 46 678 843 644

Andante Finance Company Pty Ltd
ABN 82 639 365 183

AirTrunk Financing Pty Ltd
ABN 76 616 248 992

AirTrunk Operating Pty Ltd
ABN 99 612 044 283

AirTrunk Australia Holding Pty Ltd
ABN 50 616 379 232

Amidala AU Hold TC Pty Ltd
as trustee for Amidala AU Hold Trust
ABN 60 638 981 797

References to AirTrunk (we, us or our) throughout this Modern Slavery Statement refer to these entities and are also intended to include the broader AirTrunk Group, which includes entities not subject to the reporting requirements under the Modern Slavery Act 2018 (Cth), but which nonetheless intend to implement the key principles set out in this Modern Slavery Statement.

This statement is made in relation to the financial year commencing 1 July 2024 and ending 30 June 2025.

02. MESSAGE FROM THE CEO

At AirTrunk, we recognise our responsibility to prevent modern slavery and protect human rights across our operation and supply chain.

In response to accelerating demand for cloud and AI infrastructure, AirTrunk continues to expand responsibly across Asia Pacific and Japan. With 1.9 GW of capacity across Australia, Singapore, Hong Kong, Japan, and Malaysia, as we scale, we remain deeply committed to ensuring that our growth is underpinned by ethical and transparent business practices across our operations and supply chain.

We have a zero-tolerance approach to modern slavery. In FY25 we continued to actively assess and manage risk and, strengthen supplier due-diligence processes. We expect the same vigilance from our employees, contractors, business partners, and suppliers. We continue to build capability across our teams, enhance transparency and work collaboratively to support safe and fair working conditions. In FY25, we further strengthened our responsible procurement practices, deepened supplier engagement, and advanced our monitoring and reporting processes.

This statement outlines the actions AirTrunk has taken during FY25 to meet our obligations under the Modern Slavery Act 2018 (Cth), and to continuously strengthen how we identify, address and prevent modern slavery risks in our business and supply chain.



A stylized, handwritten signature in black ink, appearing to read 'Robin Khuda'.

Robin Khuda
Founder and CEO

03. KEY ACTIONS TAKEN

During FY25, and since the end of the reporting period, AirTrunk achieved several milestones to further reduce the risk of modern slavery in its business, including:

01.	02.	03.
Completion of a comprehensive modern slavery risk assessment to update our understanding of AirTrunk's current modern slavery risk profile, taking into account our geographical footprint, supply chain and internal business policies and practices.	Evolution and enhancement of our Third Party Risk Management program (formerly Supply Chain Assurance) , including an expanded due-diligence questionnaire to incorporate additional geographic and sector-based metrics as recommended by our third-party risk assessment.	Update of the AirTrunk Modern Slavery Policy to reflect new processes and procedures for modern slavery identification which were introduced since the first adoption of the Modern Slavery Policy in 2021.

These milestones build on AirTrunk's existing initiatives designed to minimise and mitigate modern slavery risk, as outlined in [Section 6: Addressing Modern Slavery Risks](#).

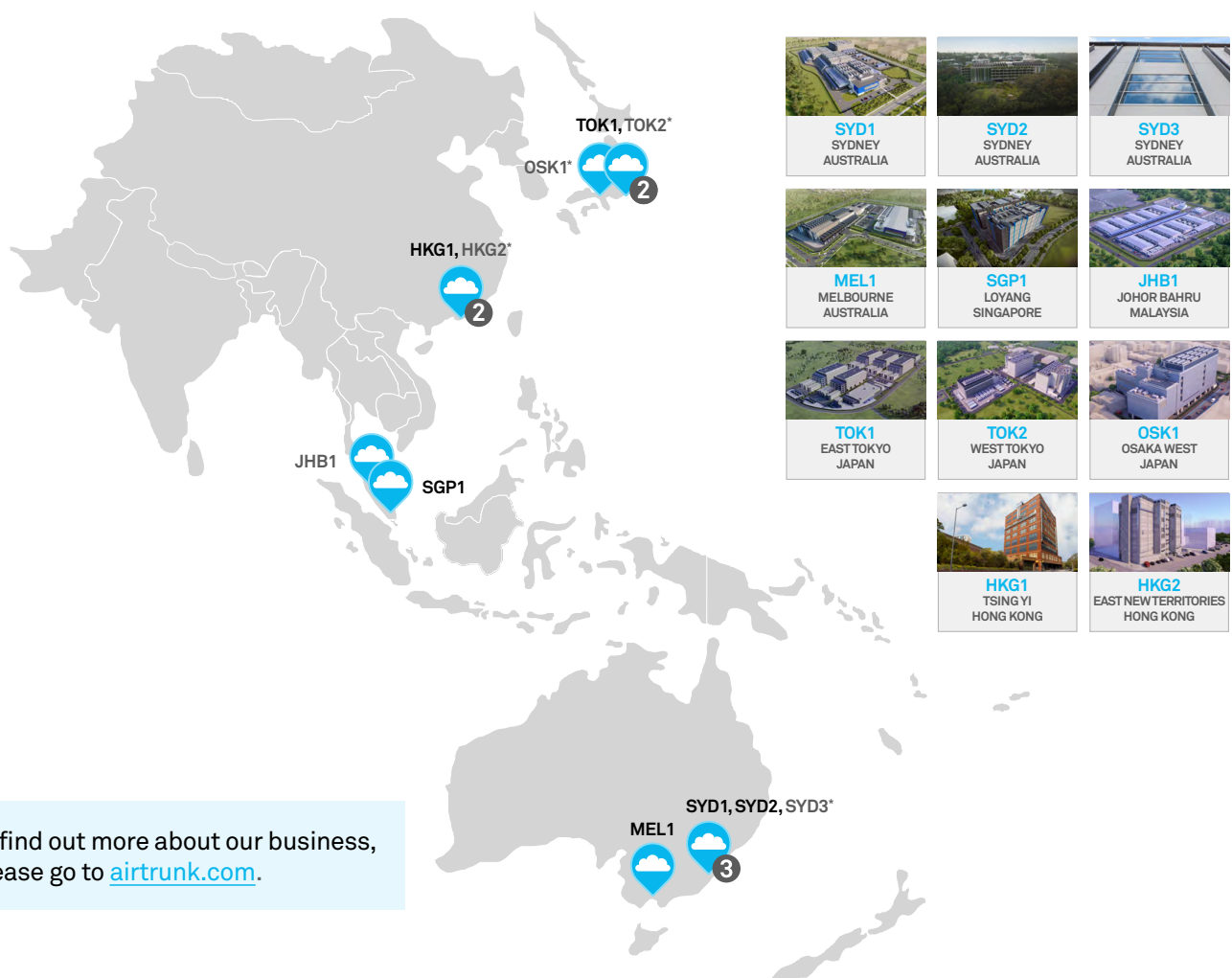
04. OUR BUSINESS

AirTrunk is a best-in-class hyperscale data centre specialist creating a platform for cloud, content and large enterprise customers across the region. AirTrunk designs, develops and operates data centre campuses with industry leading reliability, technology innovation and energy and water efficiency. Our suppliers and business partners support us in developing this infrastructure and providing services to our customers.

Founded in Australia in 2015 and privately owned, AirTrunk currently operates in Australia, Singapore, Hong Kong, Japan and Malaysia, enabling us to support increasing demand from global tier-one technology companies in the region. In 2024, Blackstone (the world's largest alternative asset manager) along with Canada Pension Plan Investment Board (CPP) acquired AirTrunk, investing alongside AirTrunk's founder and CEO, Robin Khuda.

As the leading APJ data centre platform with 12 centres offering 1.9 gigawatts (GW) of total capacity, AirTrunk takes its responsibility to protect its communities seriously.

Our business is organised into core functions including Design, Development, Construction, Operations and Commercial/Corporate Services. AirTrunk has approximately 500 employees across APJ. As these employees predominantly consist of highly skilled professionals engaged in accordance with local employment requirements, we consider the risk of modern slavery in our direct business operations to be low.



To find out more about our business, please go to airtrunk.com.

Our Purpose and Values

AirTrunk's purpose is to scale and sustain the relentless growth of APJ's digital future. Our purpose is underpinned by our company values.



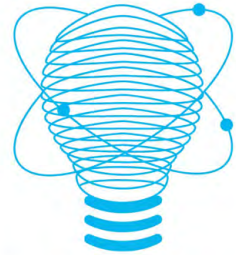
ACCOUNTABLE

We own our actions



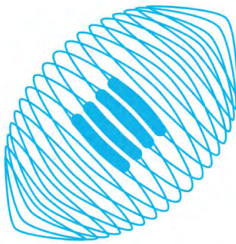
CUSTOMER CENTRED

We help our customers succeed



INNOVATIVE

We break new ground



ONE TEAM

We are better together



SUSTAINABLE

We care about a better future

At AirTrunk, our values shape how we collaborate, innovate and deliver for our customers, partners, communities and each other. United by a shared purpose to scale and sustain the relentless growth of the digital future, we live these five principles every day.

Our Supply Chains

The AirTrunk Group engages with a wide range of suppliers and third-party business partners, typically located in the countries in which we operate across the APJ region.

Most of our procurement activities involve sourcing goods and services to support the development of new data centres and the operation and maintenance of existing facilities. This includes:

- Design and construction services
- Critical data centre plant and equipment
- Provision of data centre software and hardware
- Energy and utility services
- Data centre operational facility management services and security
- Information and communication services
- Other professional services

In FY25, 22 organisations accounted for 80% of our total spend on goods and services. Most of these key suppliers and business partners are large multinational companies with established governance structures and their own corporate social responsibility programmes, including commitments relating to human rights and modern slavery. AirTrunk is committed to ensuring that its suppliers are taking action to manage modern slavery risk (as discussed in [Section 6: Addressing Modern Slavery Risks](#)).

Our commitment to sustainable growth, respect for our communities, the use of ethical labour and the mitigation of modern slavery risk is fundamental to our material procurement decisions.

05. ASSESSMENT OF MODERN SLAVERY RISKS

AirTrunk recognises that modern slavery risks can arise in many forms including forced labour, debt bondage, servitude and human trafficking. AirTrunk considers it fundamental to its sustainable growth and long-term success that these risks are identified, assessed and mitigated appropriately.

AirTrunk assesses the modern slavery risk in our business operations and supply chain using the following inherent risk indicators:

RISK	
01	Regional and Country Risk – Higher risk factors include poor governance, weak regulatory system and low socioeconomic status
02	Sector Risk – Higher risk sector factors include industries that are unregulated or involve seasonal, low-paying, low-skilled and dangerous or hazardous work.
03	Product Risk – Higher risk products or services are typically those that require labour-intensive processes or involve materials and components derived from cheap or vulnerable labour.

There are varying levels of modern slavery risk exposure across our business. AirTrunk’s direct workforce comprises professionals based across Australia, Japan, Singapore, Hong Kong and Malaysia. Modern slavery risks are lower in our direct workforce that is supported by internal recruitment and onboarding practices, as well as employee benefits and well-being programs.

AirTrunk is exposed to higher levels of modern slavery risk exposure through its supply chain. AirTrunk engages contractors, primarily in respect of construction of data centres, and maintenance of its operational data centre facilities. The construction sector presents elevated risks due to the prevalence of low-skill labour, subcontracting practices and often compressed timelines. Maintenance and facility management contractors, such as cleaners and security guards also present higher risks due to the use of low-skill, migrant and vulnerable workers. AirTrunk also procures products and services from various sectors, including electrical, energy/utilities and mechanical. AirTrunk conducts due diligence over all suppliers and imposes contractual obligations and a Supplier Code of Conduct requiring suppliers to comply with all labour and human rights related laws and regulations, and to meet AirTrunk’s standards of business conduct.

Modern slavery risks in our supply chain are generally exacerbated in higher risk jurisdictions. Of the regions that AirTrunk operates in – Australia and Japan represent lower risk, Singapore and Hong Kong are moderate risk and Malaysia represents higher risk. AirTrunk remains vigilant operating in and procuring goods and services from these jurisdictions. AirTrunk is also alert to modern slavery risks when evaluating new business or new market opportunities.

AirTrunk’s modern slavery risk profile was reviewed as part of a modern slavery risk assessment completed in December 2024. Recommended actions to continually improve are being considered and gradually implemented.

06. ADDRESSING MODERN SLAVERY RISKS

To minimise and manage the modern slavery risks identified in AirTrunk's business, AirTrunk:

FOCUS	ACTION
CORPORATE POLICIES	<p>Maintains a suite of corporate policies outlining AirTrunk's stance on modern slavery and human rights, including a Modern Slavery Policy, a Whistleblowing Policy, a Human Rights Policy Statement and a Supplier Code of Conduct. These policies reflect the nature of modern slavery and other risks in AirTrunk's operations and supply chains and align with AirTrunk's risk management strategy.</p> <p>These policies are reviewed periodically to ensure they remain appropriate and aligned with local requirements as AirTrunk enters new markets. The Human Rights Policy Statement was updated in FY24, and the Modern Slavery Policy was updated in FY25 following the conclusion of the modern slavery risk assessment to reflect new processes and procedures, particularly in relation to supplier due diligence. The AirTrunk Whistleblowing policies were also updated in FY25.</p> <p>These policies are publicly available on AirTrunk's website (in English and local languages of the countries in which AirTrunk operates), and are communicated to suppliers as part of the onboarding process. In addition these updates and any other relevant information have been presented to the Safety, Sustainability & Construction Committee which reports directly to the Board of Directors, ensuring that Modern Slavery remains an important consideration at all levels of the business.</p>
"SPEAK UP" CULTURE	<p>Provides an anonymous whistleblowing platform for employees, contractors, suppliers and other business partners to raise modern slavery and other serious concerns appropriately. Reports can be made in English as well as in the local languages of the countries in which AirTrunk operates. This is supported by the AirTrunk Group Whistleblowing Policy.</p>
SUPPLIER DUE DILIGENCE	<p>Conducts robust supplier due diligence (as further detailed in the FY25 initiatives section below).</p>
WORKING GROUP	<p>Maintains a cross-functional Modern Slavery Working Group comprising members of the legal, procurement, risk and sustainability teams. The group meets quarterly, and on ad-hoc basis when required, to review and escalate risks.</p>
CONTRACTUAL REQUIREMENTS	<p>Implements contractual requirements, wherever possible, to ensure suppliers have appropriate policies and procedures in place to address modern slavery risks and are obliged to inform AirTrunk of any instances of modern slavery.</p>
AWARENESS TRAINING	<p>Delivers modern slavery awareness training to employees to ensure staff are equipped to identify modern slavery risks. A compulsory training module is available to all staff and is included as part of employee induction. The module is scheduled for update during FY26.</p>

To further build upon the progress made in recent years and the practices outlined above, in FY25 AirTrunk has focused on the following three measures.

1. Developing a responsible supply chain

In FY23, AirTrunk implemented a new Third Party Risk Management program to formalise and strengthen our supplier due diligence process, to ensure we engage suppliers that align with AirTrunk's standards and expectations, including from a risk perspective. In FY24, AirTrunk made significant progress in further implementing this program to support a formalised procurement strategy and resilient supply chain.

Building on these previous achievements, from FY25 all new vendors go through an onboarding due diligence process and are vetted through the Third Party Risk Management program.

The program allows AirTrunk to:

- Onboard all suppliers, and manage existing suppliers, via a dedicated platform;
- Systematically identify and manage risk and compliance throughout the supplier lifecycle;
- Communicate expectations regarding compliance with AirTrunk's policies and standards and legal/regulatory obligations; and
- Screen suppliers against a multitude of data sources to identify legal, financial, ESG, cyber and regulatory risks.

Modern slavery risk is addressed through the Third Party Risk Management program, via identification of higher-risk suppliers using Global Slavery Indices and ESG predictors, and via ongoing third-party screening of suppliers. This continuous screening ensures that AirTrunk is made aware of any reported modern slavery incidents with respect to screened entities. To date, AirTrunk's screening has not identified any instances of modern slavery.

For strategic suppliers (classification as 'strategic' is based on spend thresholds and risk, informed by the Third Party Risk Management program process outlined above), AirTrunk collects additional information as part of the onboarding process. This includes confirmation that suppliers comply with modern slavery laws, maintain appropriate supporting policies and are not aware of modern slavery incidents in their supply chain. For selected strategic suppliers, AirTrunk also conducts on-site visits to evaluate supplier operations.

To complement the Third Party Risk Management program, AirTrunk launched a supplier relationship management program in FY24 to support strong, long-term partnerships with key suppliers. As part of this program, AirTrunk facilitates periodic supplier business reviews to assess general supplier performance using KPI scoring. Key performance areas include cost, safety, delivery, quality and sustainability (which includes criteria relating to labour and modern slavery). The program initially covered strategic suppliers of owner-supplied equipment and was expanded in FY25 to include General Contractors.

In FY25 enhanced due diligence was extended beyond strategic suppliers identified by spend to include sector and country risk to ensure that any high risk but low-spend suppliers were also identified and reviewed.

2. Completion of Modern Slavery Risk Assessment

In FY25, a modern slavery risk assessment was conducted to review AirTrunk's current policies and procedures, particularly in light of continued business growth and expansion into new markets.

AirTrunk engaged independent legal advisors to carry out a privileged risk assessment, which highlighted key risks within our internal processes and procedures. The assessment was used to inform enhancements to our Third Party Risk Management program. Beyond the expansion of the supplier due diligence to include sector and country risks, AirTrunk is undertaking further review of the identified risks to determine additional steps that can be taken during FY26 to strengthen its modern slavery programme and reduce the risk of modern slavery occurring in our operations and supply chains

3. Roll out of annual multi-tiered due diligence questionnaire

Consistent with previous years, AirTrunk rolled out an annual modern slavery questionnaire for our tier 1 suppliers which represent in aggregate 80% of our total spend on suppliers. This provides AirTrunk with increased visibility over these suppliers' approach to modern slavery, supply chain management and working conditions, and that of their key suppliers (our tier 2 suppliers).

In FY25, this questionnaire was rolled out using the same platform used for the Third Party Risk Management program to ensure all information is centralised, and to support a streamlined user experience for suppliers.

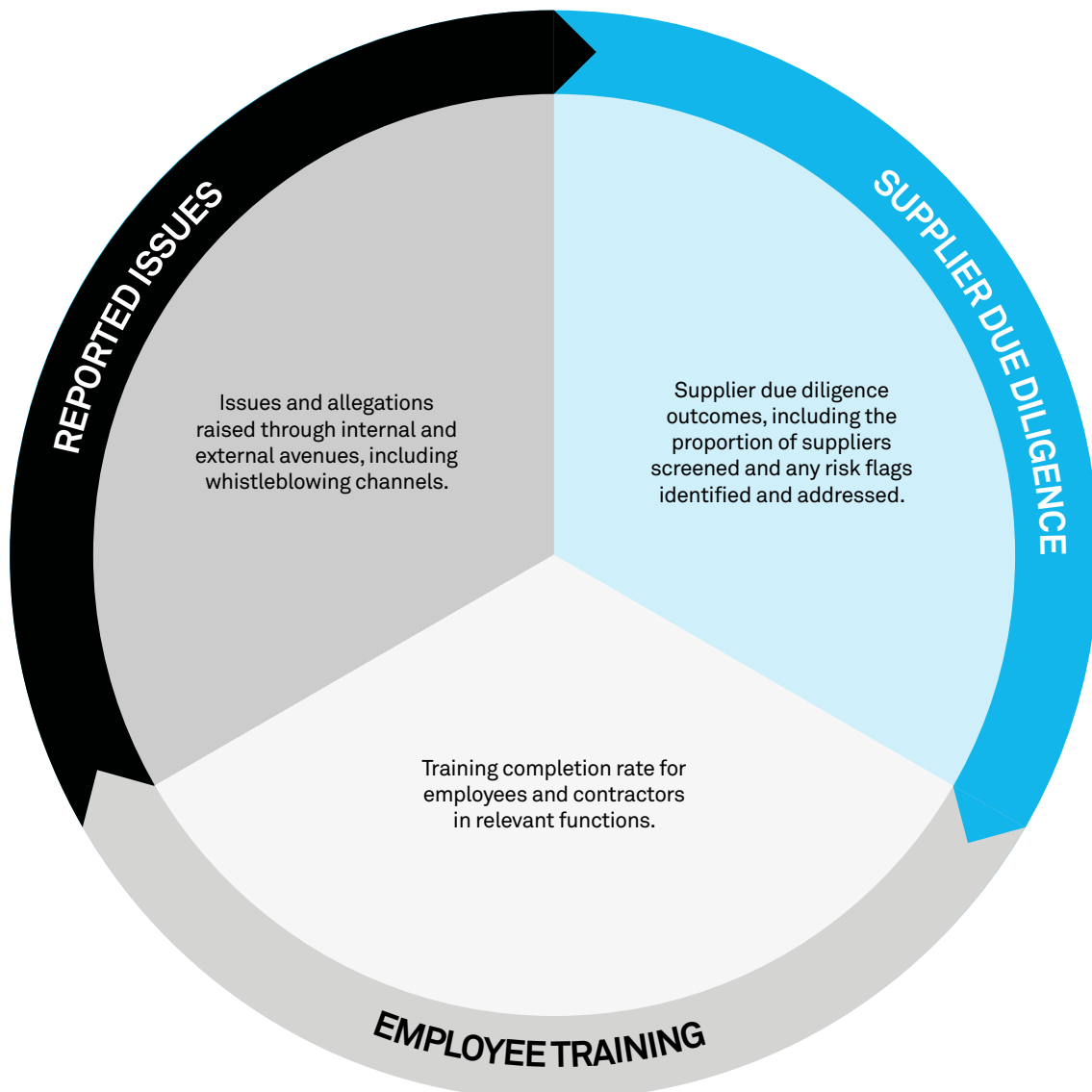
The Supply Chain team reviews all questionnaire responses and escalates relevant findings to the Modern Slavery Working Group to determine whether further engagement is required with any of the suppliers. Third-party screening is also undertaken for tier 2 suppliers identified through the questionnaire. With respect to tier 2 suppliers identified as part of the FY25 annual multi-tiered due diligence process, no instances of modern slavery were identified.

07. MEASURING EFFECTIVENESS

AirTrunk is committed to the continued improvement of its human rights framework to combat modern slavery. Measuring effectiveness is an important part of our approach. As our business and supply chain evolve, we continue to refine our processes and indicators to assess how well we are identifying, preventing and mitigating modern slavery risks.

AirTrunk monitors the effectiveness of its program through the Modern Slavery Working Group, which reviews progress against our commitments and oversees key risk management activities.

As our business grows and matures, we are developing a set of clear metrics to track effectiveness. These include:



These indicators will be reviewed on an ongoing basis to identify gaps, strengthen decision-making and drive continuous improvement. Enhancing visibility across our supply chain and demonstrating progress against these metrics serve as tangible evidence of the effectiveness of our policies and practices.

08. CONSULTATION AND APPROVAL

In developing our Modern Slavery Statement, we engaged with key business areas responsible for procurement, risk and legal. All reporting entities are under common management and directorship.

The Statement was approved on [DATE] by the Board of Directors of each of the AirTrunk entities named in [Section 1: About this Statement](#).

The AirTrunk Group is dedicated to continuous improvement to address the challenging and complex issue of modern slavery.

APPENDIX:

MANDATORY REQUIREMENT INDEX

The table below outlines the sections of this Statement which address AirTrunk's response to meet the mandatory reporting requirements of the Modern Slavery Act 2018 (Cth).

NO.	REPORTING REQUIREMENT	SECTION
01	Section 16(1)(a): Identify the reporting entities	01
02	Section 16(1)(b): Describe the reporting entities structure, operations and supply chains.	04
03	Section 16(1)(c): Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	05
04	Section 16(1)(d): Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	06
05	Section 16(1)(e): Describe how the reporting entity assesses the effectiveness of these actions.	07
06	Section 16(1)(f): Describe the process of consultation with any entities the reporting entity owns or controls.	08
07	Section 16(1)(g): Include any other information which the reporting entities consider relevant.	N/A

