

## **Telehouse Modern Slavery Statement – July 2024.**

### **Introduction**

Telehouse is committed to ensuring that modern slavery and human trafficking are not taking place in our own business or within our supply chain. We have developed our approach over the past few years, and we are looking at ways to develop and improve our processes to ensure that this continues.

In accordance with the Modern Slavery Act 2015, this statement describes the steps Telehouse Holdings Limited and Telehouse International Corporation of Europe Limited including all relevant branches (together, “Telehouse”) have taken during our financial year ending 31 March 2024 to tackle the risk of modern slavery and human trafficking across our businesses and supply chains.

This statement provides insights into:

- Our business, its structure and supply chains
- Our policies and due diligence processes in relation to modern slavery and human trafficking
- Our risk assessment and management
- The key performance indicators we use to measure the effectiveness of our measures
- Training and awareness

### **Organisational structure, business, and supply chains**

Telehouse was established in 1990 and is part of a Japanese owned global group of companies that provide managed ICT solutions for global corporations. Telehouse focuses on the provision of colocation services. As with many corporations, we work with a significant number of suppliers who we rely on for goods and materials, including those for construction of our data centres. We prefer long term business relationships which enables us to gain better insights into the risks associated within each of our supply chains for us to manage potential risks more efficiently.

### **Anti-slavery initiatives and responsibilities**

Telehouse’s key anti-slavery initiatives cover a broad range of policies, due diligence processes, risk assessments and training as follows:

- **Policies and modern slavery statement:** The Human Resources department, in collaboration with Compliance, Legal and Procurement, are responsible for putting in place and reviewing this statement and the further policies detailed in section 4 below. These policies set our commitments and expectations to our suppliers, our people and our business partners.
- **Risk assessment:** Risk analysis is undertaken at every level of the organisation as a structured, controlled and coordinated process. We do this to better understand the risk profile of our business and supply chain, enabling targeted risk mitigation. Risk reporting is built on existing departmental level reporting and is integrated wherever practical into routine management reporting. Where risks are deemed significant, they are escalated to the top of our organisation to enable oversight and risk mitigation actions.
- **Investigations/due diligence:** As part of the Telehouse due diligence process the Procurement department reviews supplier and contractor human rights and modern slavery controls at the point of engagement. This pre-screening enables potential suppliers to be assessed against the minimum standards we require.
- **Resourcing:** Telehouse is committed to providing resources including human resources and specialised skills, technological resources, and financial resources to support the implementation, monitoring, and improvement of employee awareness of human rights and modern slavery laws.

### **Relevant Policies**

Telehouse has several policies that set out our expectations and commitments to our suppliers, our people and our business partners. These are set out below:

- **Whistleblowing policy** – Telehouse encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.
- **Supplier Code of Conduct**- Telehouse is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Telehouse works with suppliers to ensure that they meet the standards expected of them and, where needed, improve their workers’

working conditions. Serious violations of the organisation's Supplier Code of Conduct may lead to the termination of the business relationship.

- Recruitment policy – Telehouse uses only specified, reputable employment agencies to source prospective employees and always verifies the practices of any new agency it is using before accepting workers from that agency.
- Modern Slavery & Human Trafficking Policy – Our employees have various responsibilities relating to the prevention, detection and reporting of modern slavery in all parts of our business, including the supply chain. Employees are encouraged to raise concerns about any issue or suspicion of modern slavery at the earliest possible stage.

### **Supplier Due Diligence**

Telehouse undertakes due diligence when considering taking on new suppliers . The organisation's due diligence and reviews include:

- Evaluating the modern slavery and human trafficking risks of each new supplier.
- Carrying out supplier due diligence. Telehouse requests evidence from suppliers of their compliance with applicable modern slavery law at the point of engagement .

### **Training**

Telehouse ensures that all staff have access to the Modern Slavery & Human Trafficking Policy (and all other policies) at all times. If any staff are unsure of the contents of any policy, they are encouraged to reach out to Telehouse HR.

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Managing Director

*Telehouse International Corporation of Europe*