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## **TELEHOUSE – MODERN SLAVERY STATEMENT**

### **1.0 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 2022 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

### **2.0 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.

### **3.0 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 (i.e. when negotiation and contracting takes place) and post initial engagement where further material services or projects are contracted. This pre-screening enables potential suppliers to be assessed against our minimum standards we require.

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- Training: 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. Appropriate e-learning training is undertaken across Telehouse on a regular basis.

#### **4.0 Relevant Policies**

Telehouse has a number of 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.
- Employee code of conduct - The 'Telehouse Behaviours' make it clear to employees the behaviour expected of them. Telehouse strives to maintain the highest standards of employee conduct and ethical behaviour when operating in the UK and abroad and when managing its supply chain. All new employees receive a copy of this, and it is also embedded into our performance management.
- Our Procurement policy- 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 Procurement Policy will 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.
- Corporate social responsibility policy - Telehouse is committed to integrating its business values and operations to meet the expectations of its stakeholders - customers, employees, suppliers, the community, and the environment.

#### **5.0 Supplier Due Diligence**

Telehouse undertakes due diligence when considering taking on new suppliers and reviews its existing 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 both at the initial point of engagement (i.e., when negotiation and contracting takes place) and post initial engagement where further material services or projects are contracted.
- Participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking.

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### **6.0 Performance Indicators**

Telehouse has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, Telehouse now measures its performance against the following KPIs in relation to modern slavery risk management:

- Percentage of staff having completed training on modern slavery on a regular basis (Telehouse requires all staff to complete this on a regular basis).
- Percentage of current suppliers that have successfully completed Telehouse's supplier due diligence process before entering Telehouse's supply chain (Telehouse requires all suppliers to successfully complete this process before contracting with them as a supplier).

### **7.0 Training**

Telehouse requires all staff to complete training on modern slavery as part of the organisation's wider human rights/ethics/ethical trade training programme.

The organisation's modern slavery training covers:

- Our business's purchasing practices, which influence supply chain conditions, and which should therefore be designed to prevent purchases at unrealistically low prices; the use of third parties engaged on unrealistically low wages or wages below a country's national minimum wage; and the provision of products by an unrealistic deadline.
- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including the resources and support available to carry out this assessment.
- What initial steps should be taken if slavery or human trafficking is suspected.
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation.
- What external help is available, for example through the Modern Slavery Helpline.
- What messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies.
- What steps Telehouse should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

### **8.0 Awareness Programme**

As well as training staff, Telehouse raises awareness of modern slavery issues by regularly communicating relevant information to staff.

The communications explain to staff:

- The basic principles of the Modern Slavery Act 2015.
- How employees can identify and prevent slavery and human trafficking.

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- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation.

Signed

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