

# Supplier Code of Conduct

Macquarie Data Centres

October 2024

## Contents

Purpose .....	2
ESG Practices .....	2
Employment Practices .....	2
Health, Safety and Wellbeing.....	3
Environmental Impacts .....	3
Ethics, Security and Confidentiality .....	3
Operational Resilience .....	4
Group Policies .....	4
Reporting Breaches or Potential Breaches .....	4
Change Management .....	4

## Purpose

Macquarie Data Centres (MDC) and its related entities (Group) are committed to conducting business in an ethical, socially responsible, and environmentally sustainable manner. Our long-term success depends on our ability to balance economic, environmental, and social considerations, together with strong governance mechanisms in our operations

Suppliers and their employees, personnel, agents, suppliers and subcontractors (“Suppliers”) are expected to adhere to this Supplier Code of Conduct while conducting business with MDC.

This Supplier Code of Conduct aims to ensure Suppliers:

- act ethically, fairly, and honestly in all dealings
- declare actual or perceived conflicts of interest as soon as such matters arise
- prevent the loss or disclosure of confidential information
- use reasonable efforts to mitigate the environmental and social impact of their operations
- promptly notify MDC of any adverse events, conditions or risks impacting your ability to perform your obligations
- comply with other Group policies that Suppliers are expected to meet, such as the Whistleblower Policy, Modern Slavery Policy and Anti-bribery and Corruption Policy

Suppliers are expected to ensure ongoing compliance with this Supplier Code of Conduct and associated policies and procedures.

MDC may assess Supplier’s compliance with this Code of Conduct through a request for supporting documentation, through site visits or a desktop audit. Where deemed necessary, MDC will work with our Suppliers to support any improvement to Supplier practices relating to this Code of Conduct. We expect that Suppliers will support reasonable requests for information in a timely and transparent manner.

## ESG Practices

Suppliers agree to provide MDC with information regarding their Environmental, Social and Governance practices upon request.

## Employment Practices

Suppliers are required to comply with all applicable employment laws and regulations.

Suppliers, including their employment agencies, sub-agencies, and recruitment firms are expected to:

- not use misleading or fraudulent practices during the recruitment of employees,
- ensure payment of wages in accordance with applicable wage laws,
- provide legally mandated benefits within the jurisdiction where the Supplier operates or engages their workers
- ensure freedom of association and right to collective bargaining in accordance with the jurisdiction where the Supplier operates or engages their workers
- provide effective grievance procedures

## Health, Safety and Wellbeing

To promote and maintain the health, safety and wellbeing of Supplier and MDC personnel, Suppliers are expected to maintain their own policies and procedures to ensure:

- employees, agents, and subcontractors treat all people with respect and dignity, encourage diversity, remain receptive to diverse opinions, promote equal opportunity for all, and foster an inclusive and ethical culture in their workplace
- compliance with all applicable occupational health and safety laws and provide a safe and healthy work environment for their employees, agents, and subcontractors, including taking suitable precautions to prevent the spread of illness
- hazardous substances required in the delivery of products and services are identified, labelled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal
- employees, agents, and subcontractors do not perform work for MDC under the influence of alcohol, illegal drugs, or drugs that could compromise their safety or the safety of others
- staff are equipped and trained in the use of Personal Protective Equipment as required to mitigate the risk of injury during work activities
- all injuries and near-misses are promptly reported to MDC personnel

## Environmental Impacts

To minimise impacts to the environment at our locations, Suppliers are expected to:

- comply with all applicable environmental laws and regulations, and take reasonable steps to mitigate the environmental risks and impacts associated with the fabrication, packaging, transport, installation, disposal, and use of products provided to or removed during Supplier services provided to MDC
- provide services in a manner that minimises the release of greenhouse gas emissions and other airborne pollutants wherever practicable
- work to minimise, prevent, or eliminate waste of all types.
- promptly report any environmental incident which may pose a threat to the environment

## Ethics, Security and Confidentiality

Suppliers are expected to have formal policies and processes designed to prevent unethical practices and the loss or exposure of confidential information. Unacceptable practices include, but are not limited to:

- providing confidential information to other suppliers, giving unfair advantage in a tender process
- sharing or exposing confidential information relating to MDC, other MDC suppliers and MDC customers
- failing to take reasonable precautions to prevent the loss, theft, or exposure of confidential information
- failing to declare a conflict of interest

- colluding with other suppliers, for example submitting “dummy” bids for products and services
- colluding with sub-contractors or other suppliers to falsify or inflate invoices

Suppliers must not speak to the press or issue press releases, publicity or marketing related to MDC customers, or their relationship, work, or agreements with MDC without prior written consent of MDC’s Group Executive. Suppliers must not speak on behalf of MDC under any circumstances.

Suppliers agree to provide MDC with information regarding their security and risk management practices related to the delivery of their products and services to MDC upon request.

Suppliers agree to notify their MDC contact immediately where there is or may have been a breach of MDC or MDC customer confidentiality.

### Operational Resilience

Suppliers are expected to have policies, process and business continuity plans to manage business risk that could impact the provision of products and services to MDC.

### Group Policies

This Supplier Code of Conduct incorporates by reference Group wide policies that Suppliers are expected to meet, such as the Whistleblower Policy, Modern Slavery Policy and Anti-bribery and Corruption Policy. Copies of these policies are available on the Investor section of the Macquarie Technology Group website [www.macquarietechnologygroup.com/investors](http://www.macquarietechnologygroup.com/investors)

### Reporting Breaches or Potential Breaches

Identified or potential breaches to this Supplier Code of Conduct must be promptly reported to the Supplier’s primary Macquarie Data Centres’ contact.

### Change Management

Revisions to this Supplier Code of Conduct will be issued by the Supplier’s primary Macquarie Data Centres’ contact.

### Version History

Release Date	Approval
October 2024	Michael Gold, MDC General Counsel