

# Human Rights Policy Statement

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## ISSUE, REVIEW AND AMENDMENT

This policy shall be made available through the intranet (Switch) and its issue, and any subsequent revisions, notified to the relevant person through an internal memorandum or other appropriate form of communication.

An Appointed Person shall review this policy annually to re-affirm its conformity to the current requirements of Corporate Policy or immediately if its contents are deemed to be no longer valid.

Where revisions are required, they shall be made by replacement of the applicable page(s). An amended revision number and the date of revision shall identify each revised document; this shall be detailed within the document revision table below.

| Document Reviews |            |                |                 |                  |
|------------------|------------|----------------|-----------------|------------------|
| Date             | Revision   | Reviewer       | Approver        | Document changes |
| 23 July 2026     | Revision 1 | Heather Lawton | Eoghainn Calder | General Updates  |
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# 1.0 INTRODUCTION

## 1.1 Our Commitment

Global Switch is committed to respecting internationally recognised human rights throughout our operations and value chain.

As a leading owner, operator and developer of carrier and cloud-neutral data centres, we recognise our responsibility to conduct business in a manner that respects the dignity, wellbeing and rights of all individuals affected by our activities, business relationships, products and services.

Our Human Rights Commitments apply across our operations and value chain and have been approved by the highest governance body of the business.

Global Switch's Human Rights Commitments are aligned with:

- The International Bill of Human Rights
- The OECD Guidelines for Responsible Business Conduct
- The United Nations Guiding Principles on Business and Human Rights
- The United Nations Declaration of Human Rights
- The Convention on the Rights of the Child
- International Labour Organization (ILO) Conventions and
- Applicable laws and regulations in the jurisdictions in which we operate

Human rights principles are embedded throughout our governance framework, policies, due diligence processes and business relationships.

## 1.2 Scope

This Policy Statement applies to all Global Switch employees, officers and directors and informs our expectations of suppliers, contractors, consultants, agents, customers, business partners and other parties connected to our operations and value chain.

## 2.0 OUR COMMITMENT TO HUMAN RIGHTS

2.1 Global Switch is committed to conducting business responsibly and with respect for human rights.

We seek to identify, prevent, mitigate and address actual and potential adverse human rights impacts associated with our operations and business relationships.

Our commitment is reflected through our Code of Conduct, Supplier Code of Conduct and supporting policies, which address:

- Respectful and ethical conduct
- Workplace health, safety and wellbeing
- Equal opportunities and inclusion
- Non-discrimination and anti-harassment
- Freedom of association and collective bargaining
- Data privacy and confidentiality
- Responsible business conduct
- Anti-bribery and anti-corruption
- Environmental responsibility and
- Respect for internationally recognised human rights

We expect employees and those acting on behalf of Global Switch to uphold these principles in all business activities. We seek to work with business partners whose values and practices are consistent with our commitment to respect human rights and responsible business conduct.

## 3.0 GOVERNANCE

3.1 Human rights form an integral part of Global Switch's ESG governance framework.

The Board retains ultimate oversight of ESG matters and is informed of ESG-related issues through established governance processes.

Day-to-day implementation of ESG strategy is supported through the Executive Committee and the cross-Functional ESG Steering Group.

Responsibility for oversight of Human Rights within the ESG governance framework sits with the Chief Legal Officer.

Human rights-related responsibilities are also embedded across key business functions, including Human Resources, Procurement, Operations, Delivery, Information Security and Customer-facing teams.

Global Switch's governance approach is designed to support effective management of impacts, risks and opportunities relating to people across our workforce, value chain, affected communities and end users.

## 4.0 OUR HUMAN RIGHTS DUE DILIGENCE APPROACH

4.1 Global Switch applies a Sustainability Due Diligence framework informed by the OECD Guidelines for Responsible Business Conduct and the United Nations Guiding Principles on Business and Human Rights.

Through this framework we seek to:

- Embed due diligence within governance, strategy and decision-making
- Identify and assess actual and potential impacts on people and the environment
- Engage with stakeholders and affected parties
- Take action to prevent, mitigate and address adverse impacts
- Track effectiveness of actions taken and
- Provide channels through which concerns can be raised.

Our Double Materiality Assessment supports the identification of human rights-related impacts, risks and opportunities across our operations and value chain. Human rights topics receive additional severity weighting within the assessment methodology to ensure their significance is appropriately considered.

Stakeholder engagement forms an important part of our due diligence approach. We engage with employees, suppliers, customers, investors, regulators, communities and other stakeholders to understand concerns and improve our management of human rights-related matters. In our due diligence activities we seek to consider the perspectives and potential impacts on individuals or groups who may be disproportionately affected by adverse impacts.

## 5.0 HUMAN RIGHTS TOPICS IN OUR WORKFORCE

Global Switch is committed to providing a safe, fair, inclusive and respectful workplace.

Our priority workforce-related human rights topics include:

### 5.1 Secure Employment

We support secure employment and seek to provide stable working arrangements that contribute to employee wellbeing and economic security.

### 5.2 Fair and Adequate Wages

We are committed to providing fair remuneration in accordance with applicable laws, regulations and contractual requirements.

### 5.3 Freedom of Association and Collective Bargaining

We respect the rights of employees to organise, associate freely and engage in collective bargaining in accordance with applicable laws and regulations.

### 5.4 Diversity, Equity and Inclusion

We are committed to fostering an inclusive workplace where individuals are treated with dignity and respect.

We prohibit discrimination, harassment and victimisation on the basis of race, colour, nationality, ethnic origin, age, religion, belief, disability, sex, gender identity, sexual orientation, pregnancy, maternity status, marital status or any other protected characteristic.

### 5.5 Learning and Development

We support continuous learning and skills development to help employees thrive in a rapidly evolving industry.

### 5.6 Health, Safety and Wellbeing

Protecting the health, safety and wellbeing of our workforce is a fundamental priority.

We seek to maintain safe working environments, manage workplace risks and promote physical and mental wellbeing throughout our operations.

### 5.7 Work-Life Balance

We support employee wellbeing through family-related leave provisions and initiatives designed to promote a healthy balance between work and private life responsibilities.

## 6.0 HUMAN RIGHTS TOPICS IN OUR VALUE CHAIN

Global Switch recognises that human rights impacts may arise through business relationships with suppliers, contractors and other value chain partners.

We expect suppliers and contractors to uphold standards consistent with our Supplier Code of Conduct and applicable laws.

Priority value chain human rights topics include:

### 6.1 **Child Labour**

We do not tolerate child labour and expect suppliers and contractors to maintain effective controls to prevent its occurrence.

### 6.2 **Forced Labour, Human Trafficking and Modern Slavery**

We prohibit all forms of forced labour, bonded labour, trafficked labour and modern slavery.

We expect suppliers and contractors to implement appropriate due diligence measures to identify and prevent these risks.

### 6.3 **Working Time**

We support compliance with applicable working time requirements and expect suppliers to manage working hours in a manner that protects worker health, safety and wellbeing.

### 6.4 **Health and Safety**

We expect suppliers, contractors and subcontractors to provide safe and healthy working conditions and to maintain appropriate health and safety management practices.

### 6.5 **Freedom of Association**

We respect workers' rights to organise, associate and bargain collectively and expect our suppliers and contractors to do the same.

### 6.6 **Non-Discrimination and Equal Opportunity**

We expect suppliers and contractors to provide workplaces free from discrimination, harassment and unfair treatment.

### 6.7 **Fair Employment Practices**

We expect workers to receive fair employment terms, clear written contracts and treatment consistent with applicable labour laws and internationally recognised standards.

## 6.8 Privacy and Personal Data

We expect suppliers and contractors to respect privacy rights and protect personal information relating to workers and other stakeholders.

# 7.0 HUMAN RIGHTS IN AFFECTED COMMUNITIES

## 7.1 Global Switch recognises that its operations may affect local communities and other stakeholders.

We seek to engage responsibly with communities that may be affected by our activities and to understand concerns relating to our operations, developments and use of resources.

We are committed to:

- Maintaining channels through which concerns can be raised
- Considering community perspectives within decision-making processes
- Supporting positive economic and social outcomes where possible and
- Managing environmental and social impacts associated with our activities.

# 8.0 HUMAN RIGHTS IN CUSTOMERS, CONSUMERS AND END USERS

Although Global Switch primarily serves business customers, our infrastructure supports services relied upon by consumers and end users worldwide.

We recognise the importance of protecting the rights and interests of those who ultimately depend on the services enabled by our infrastructure.

Priority topics include:

## 8.1 Privacy and Data Protection

We seek to safeguard information and maintain appropriate controls to protect privacy and personal data.

## 8.2 Access to Information and Critical Services

We recognise that many end users rely on services hosted within our facilities, including services supporting health, safety, security, financial systems and communications.

## 8.3 Service Continuity and Resilience

We work to maintain resilient and secure operations that support continuity of service and reduce the risk of adverse impacts on customers, consumers and end users.

# 9.0 SPEAKING UP AND ACCESS TO REMEDY

Global Switch encourages the reporting of concerns relating to actual or suspected misconduct, unethical behaviour, human rights impacts or breaches of our policies.

Individuals may raise concerns through established grievance and whistleblowing channels.

## 9.1 Protection Against Retaliation

Global Switch does not tolerate retaliation against any person who raises a concern in good faith.

## 9.2 Confidentiality and Anonymity

Reports are handled confidentially and anonymous reporting options are available through independent reporting channels where permitted by law.

## 9.3 Reporting Channels

Concerns may be raised through:

- Line management
- Human Resources
- Formal grievance procedures
- Our independent whistleblowing hotline service and
- Secure external reporting channels

## 9.4 Investigation and Response

Global Switch seeks to:

- Acknowledge reports promptly
- Assess concerns fairly and objectively
- Conduct proportionate investigations
- Maintain appropriate records
- Provide updates where appropriate and
- Take corrective action where concerns are substantiated

- Insights arising from concerns raised help strengthen governance, risk management and continuous improvement across the business.

## 9.5 Access to remedy

Where Global Switch identifies that it has caused or contributed to adverse human rights impacts, we are committed to supporting or providing appropriate remedy through legitimate processes and taking steps to prevent recurrence.

# 10.0 HUMAN RIGHTS TRAINING

- 10.1 Global Switch supports implementation of this Policy Statement through awareness raising, training and communication activities appropriate to employees and relevant business functions.

Training and awareness activities may include topics such as human rights, modern slavery, business ethics, anti-bribery and corruption, diversity and inclusion, information security, workplace conduct and whistleblowing.

# 11.0 MONITORING, REPORTING AND REVIEW

- 11.1 Global Switch monitors the effectiveness of its human rights commitments through governance processes, stakeholder engagement, due diligence activities, grievance mechanisms and ESG reporting.

We track relevant human rights-related performance indicators, including participation in training programmes, workplace health and safety, concerns raised through grievance and whistleblowing mechanisms, and the implementation of corrective actions where appropriate.

We publicly report on relevant human rights-related topics through our annual ESG Report and continue to strengthen our approach in line with evolving regulatory requirements, stakeholder expectations and emerging best practice.

Global Switch also publishes an annual Modern Slavery and Human Trafficking Statement outlining actions taken to identify and address modern slavery risks within its operations and value chain.

This Human Rights Policy Statement will be reviewed at least annually, or more frequently where required by changes in legislation, business activities, risk profile or stakeholder expectations.

The Board-approved Human Rights Commitments and associated policies will continue to evolve as Global Switch strengthens its sustainability due diligence and responsible business conduct practices.

## 12.0 RELATED POLICIES AND STATEMENTS

12.1 This Human Rights Policy Statement should be read in conjunction with other Global Switch policies, standards and commitments, including:

- Anti-Bribery and Corruption Policy
- Anti-Harassment Policy
- Anti-Slavery and Human Trafficking Policy
- Code of Conduct
- Employee Handbook
- Equal Opportunities Policy
- Information Security Policy
- Integrated Management System Policy Statement
- Modern Slavery and Human Trafficking Statement
- Responsible Materials Sourcing Policy
- Supplier Code of Conduct
- Whistleblowing Policy

# Thank you

For taking the time to familiarise yourself with this document, if you have any questions please do not hesitate to contact a member of our team, or alternatively, further information can be found on our website:

[globalswitch.com](https://globalswitch.com)

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