

# Anti-slavery and Human Trafficking Policy

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# CONTENTS

|     |                                                     |   |
|-----|-----------------------------------------------------|---|
| 1.0 | POLICY STATEMENT                                    | 3 |
| 2.0 | ABOUT THIS POLICY                                   | 3 |
| 3.0 | RESPONSIBILITY FOR THE POLICY                       | 4 |
| 4.0 | YOUR RESPONSIBILITIES AND<br>HOW TO RAISE A CONCERN | 4 |
| 5.0 | COMMUNICATION                                       | 5 |
| 6.0 | BREACHES OF THIS POLICY                             | 5 |

## 1.0 POLICY STATEMENT

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, including slavery, servitude, forced and compulsory labour, and human trafficking. Each involves the deprivation of a person's liberty for the purpose of exploitation.
- 1.2 We have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to putting in place systems and controls to ensure that modern slavery is not taking place anywhere in our business or supply chains.
- 1.3 We are also committed to ensuring transparency in our business and in our approach to tackling modern slavery, in line with our disclosure obligations under the UK Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and business partners. As part of our contracting process, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, and we expect our suppliers to hold their own suppliers to the same standards.

## 2.0 ABOUT THIS POLICY

- 2.1 The purpose of this policy is to:
  - (a) set out our responsibilities, and those working for or on our behalf, in observing and upholding our position on modern slavery and human trafficking; and
  - (b) provide information to those working for or on our behalf on how to identify and report concerns.
- 2.2 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, secondees, volunteers, interns, agents, contractors, consultants, third-party representatives and business partners.
- 2.3 This policy does not form part of any employee's contract of employment and may be amended at any time.

## 3.0 RESPONSIBILITY FOR THE POLICY

- 3.1 The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 3.2 The Chief Legal Officer has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries, and auditing internal systems and procedures to ensure they are effective in countering modern slavery.
- 3.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy, and are given adequate and regular training on it.
- 3.4 Comments and queries on this policy should be addressed to the Chief Legal Officer.

## 4.0 YOUR RESPONSIBILITIES AND HOW TO RAISE A CONCERN

- 4.1 You must ensure that you read, understand and comply with this policy.
- 4.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us. You are required to avoid any activity that might lead to a breach of this policy.
- 4.3 You must notify your manager or the Chief Legal Officer as soon as possible if you believe or suspect a breach of this policy has occurred, or may occur in the future.
- 4.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery at the earliest possible stage in accordance with our Whistleblower Policy.
- 4.5 If you are unsure whether certain treatment of workers or their working conditions constitute modern slavery, raise it with your manager or the Chief Legal Officer.
- 4.6 We aim to encourage openness and will support anyone who raises genuine concerns in good faith, even if they turn out to be mistaken. No one will suffer detrimental treatment as a result of reporting a concern in good faith.

## 5.0 COMMUNICATION

- 5.1 Our commitment to addressing modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship and reinforced as appropriate.

## 6.0 BREACHES OF THIS POLICY

- 6.1 Employees who breach this policy will be dealt with under the Company's Disciplinary Policy, which may result in a formal warning or, in serious cases, dismissal with or without notice or pay in lieu, depending on the seriousness of the case.
- 6.2 Employees should be aware that in certain circumstances Global Switch may be required to, or may decide to, report a serious breach or incident to the appropriate authorities, including but not limited to any regulatory or enforcement authority.

# 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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