



**Vantage Canadian Report on  
Forced Labour and Child Labour in Supply Chains Report  
Fiscal Year ending on December 31, 2023**

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**1. ABOUT THIS REPORT**

This first report relates to the financial year ending December 31<sup>st</sup>, 2023. It is published by Vantage Data Centers Canada, Limited Partnership in compliance with Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**").

References in this report to "Vantage", "Company", "we", "our" and similar terms are to Vantage Data Centers Canada, Limited Partnership or its representatives.

This report outlines the key actions taken by the Company within the last financial year to prevent and reduce the risk of forced labour or child labour in its business and supply chain.

**2. OUR COMMITMENT**

We view the protection of human rights as a fundamental corporate responsibility and have zero tolerance for forced labour and child labour within our organization and our supply chains. Therefore, our procedures, policies and methods are subject to constant revision and are becoming increasingly stringent and rigorous to adapt to the evolving environment in which we operate.

**3. PREVENTING AND REDUCING RISKS OF FORCED LABOUR AND CHILD LABOUR AND DUE DILIGENCE PROCESS**

During our last financial year, we have taken the following steps to prevent and reduce the risk that forced labour or child labour be used at any step of goods imported by us into Canada.

To ensure all those in our supply chain and contractors comply with our values and ethics, every new vendor who offers to provide services and/or goods to Vantage goes through a rigorous due diligence process with detailed questionnaires for identifying, addressing, and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains. As we carry out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour, vendors exercising in high-risk jurisdictions and high-risk sectors (i.e. manufacturing, construction) or vendors who need to procure or use low skilled labour are required to complete an additional form targeting modern slavery.

This additional modern slavery form asks vendors to provide: a) country of registration, b) visibility level over their supply chain, c) public statement or internal policy or policies in place to deal with modern slavery (if any), d) presence of a person or team responsible for overseeing modern slavery risks (including record keeping regarding contractors and subcontractors) that arise in relation to the goods or services, e) existence of a screening process of prospective suppliers to

assess the risks of modern slavery or other human rights harms that may occur in their operations and supply chain, f) implementation of trainings for employees on how to identify, assess and respond to modern slavery risks, g) awareness of low-skilled migrant workers working in its supply chain, h) engagement in any other due diligence activities to identify, prevent and mitigate risks specific to modern slavery in its operations and supply chain.

As part of our initiatives to identify risks, such questionnaires are analyzed internally on a case-by-case basis to determine a vendor's risk profile. Such vendor will be rejected should the vendor's risk profile be considered high and with limited to no control or visibility over its supply chain, or if the answers provided are considered unsatisfactory.

Once a vendor is onboarded, such vendor is contractually bound to abide by Vantage's supplier code of conduct and policies addressing forced and/or child labour, which robust clauses require a zero-tolerance level for suppliers using child labour, prison or forced labour, human trafficking, or physical punishment, and imposing to such vendor to pass on these obligations down their supply chain. Failure to do so could lead to the termination of the business relationship by Vantage with such vendor.

As a tool to monitor its operations, Vantage has developed and implemented grievance mechanisms for witnesses to report violations against Vantage's policies and procedures, accessible to all.

As part of its initiatives to raise consciousness and educate our teams, Vantage offers training and awareness materials to all of its employees about a) the Global TPRM Program (initial due diligence processes relating to onboarding of vendors), b) the Vantage Code of Conduct which illustrates the importance of our behaviors and how we treat one another, defines our culture of leading with integrity, and outlines how we conduct our business to the highest of ethical standards and c) the Anti-Bribery and Anti-Corruption Policy which educates our people to recognize problematic behaviours and to react efficiently against it.

As our procedures, policies and methods are subject to constant revision and improvements, Vantage's teams will continue to increase its internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains on both new and existing vendors. This exercise is a continuous work in progress as we adapt to a constantly changing environment.

#### **4. ABOUT US & OUR SUPPLY CHAIN**

Vantage Data Centers Canada, Limited Partnership is a limited partnership, registered in British Columbia, under the partnership act, and is domiciled in Québec.

Vantage specializes in the design, construction and operation of data centers for cloud service providers, hyperscalers and large high-tech companies.

Vantage's organisation as a whole offers advanced data centers services and solutions on 34 sites, across the globe, on five different continents<sup>1</sup>.

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<sup>1</sup> [Data Center Locations - Vantage Data Centers \(vantage-dc.com\)](https://www.vantage-dc.com)

The construction of Vantage's sites requires meticulous effort from our different internal groups, such as the project managers, procurement, sustainability, health and safety, etc., as well as our external partners such as the engineers, architects, general contractors and consultants.

The operations of Vantage's sites are managed by key stakeholders who ensure the proper functioning of the data centers 24/7, including managing the connectivity, power, temperature and humidity and security and safety.

Local external partners on both construction and operation projects are often consulted for their expertise and understanding of specific local conditions and requirements.

#### **4.1 Our Supply Chain**

Our procurement team for our Canadian Campuses is based in Canada.

Generally speaking, the vast majority of our suppliers are located in Canada and in the United States of America. We also have suppliers to a lesser extent, in other various foreign countries, such as Mexico, Germany and other low risk Western European countries.

Our direct suppliers also have their own value chain and although we may not have complete visibility into all of our suppliers' sourcing practices, we are aware that they procure their products mostly in Canada and in the United States of America.

We mitigate our risks by fostering long-lasting relationships with our vendors, who are mostly OFCI (*Owner Furnished, Contractor Installed*) providers for our construction projects, located in the United States of America (approx. 90%), Canada (approx. 7%), other countries (less than 3%), as well as our operation equipment providers, located mostly in Canada (more than 90%). Our IT infrastructure and equipment vendors are also in the United States of America and Canada.

### **5. POLICIES AND PROCESSES**

Aligned with our commitment to prioritize the well-being, safety, and human rights of our employees, as well as those of our suppliers, our policies and management systems embed responsible business conduct and underpin our commitment to ensure that there is no forced labour or child labour in our supply chains or in any part of our business.

#### **5.1 Policies**

Our policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure forced labour or child labour is not taking place anywhere in our supply chains.

We have the following policies in place relevant to forced labour or child labour, which we continuously review and update. Please note that there is also a formal reporting process in place:

##### **a) Vantage Code of Conduct:**

The Vantage Code of Conduct is a way of confirming our commitment to our values. We carry the highest ethical standards. We each play a part in upholding and adopting these values and respecting this code. It applies to all Vantage directors, officers and employees. Failure comply with the Vantage Code of Conduct may result in disciplinary action, up to and

including dismissal. This code also applies to all employees, as well as those acting on behalf of Vantage, such as agents, representatives and consultants.

More specifically, this policy states the following:

*“How do we act as responsible citizens?*

*• Human Rights and Fair Labor Practices/Conditions*

*We support and promote the protection of human rights around the world. We are committed to upholding the human rights of both our employees and those of companies we engage. We strictly prohibit child labor, prison or forced labor, human trafficking, or physical punishment. We require our business partners and suppliers to avoid such practices, and we expect them to also promote and protect human rights.”*

**b) Supplier Code of Conduct:**

The Vantage Supplier Code of Conduct establishes Vantage’s expectations for suppliers to comply with the law, utilize ethical business practices, respect human and labour rights, and protect our environment. Suppliers must also require their next-tier suppliers to acknowledge and implement the Vantage Supplier Code of Conduct in their operations and across their supply chains. While suppliers are expected to self-monitor and demonstrate their compliance with the Vantage Supplier Code of Conduct, Vantage may audit suppliers or inspect suppliers’ facilities to confirm compliance. Suppliers that behave in a manner that is unlawful or inconsistent with the Vantage Supplier Code of Conduct, or any Vantage policy, risk termination of their business relationship with Vantage.

More specifically, the Supplier Code of Conduct stipulate the following:

*“IV. HUMAN AND LABOR RIGHTS*

*Vantage is committed to supporting human rights and treating people with dignity and respect. We expect our Suppliers to share our commitment to human rights, fair labor practices, safe and healthy workplaces, and compliance with all employment laws and regulations.*

*• Human Rights and Fair Labor Practices/Conditions*

*We support and promote the protection of human rights around the world. We expect our Suppliers to share in our respect for human rights. We strictly prohibit our Suppliers from using child labor, prison or forced labor, human trafficking, or physical punishment.*

*(...)*

*• Working Hours and Fair Compensation*

*We expect our Suppliers to comply with all applicable laws and regulations on working hours, including overtime. Suppliers should also pay their employees and workers in a timely manner and provide compensation, including overtime pay and benefits, that minimally meets applicable wage laws.”*

[Vantage-TPRM-Supplier-Code-of-Conduct\\_EN-Dec19of2022.pdf \(vantage-dc.com\)](#)

**c) Modern slavery Statement:**

Vantage supports and promotes the elimination of human trafficking and modern slavery throughout businesses and supply chains. Via its Modern Slavery Statement, Vantage

strictly prohibits unlawful child labour, prison or forced labour, human trafficking, and physical punishment in accordance with the Vantage Code of Conduct, the Supplier Code of Conduct and our core values of respect and accountability. Periodically, Vantage conducts risk assessments to identify areas where our business and supply chain may be vulnerable to human trafficking and slavery.

More specifically, this Policy states the following:

***“Policy Statement***

*Vantage strictly prohibits unlawful child labor, prison or forced labor, human trafficking, and physical punishment in accordance with the Vantage Code of Conduct, the Supplier Code of Conduct and our core values of respect and accountability.*

*Vantage employees, suppliers, contractors, subcontractors and others with whom Vantage does business are prohibited from participation in any practice that constitutes human trafficking or slavery. This includes, but is not limited to:*

- 1. Engaging or knowingly aiding and abetting in any form of trafficking in persons*
- 2. Procuring commercial sexual acts during working hours, while traveling on business, while attending off-site working functions, or in any situation in which the acts may be directly associated with Vantage*
- 3. Using forced labor of any kind for any reason*
- 4. Destroying, concealing, confiscating or otherwise denying an individual access to the individual’s identification or immigration documents*
- 5. Using fraudulent practices to recruit candidates for employment or contract positions such as failing to disclose basic information about important terms and conditions of the position, such as wages, fringe benefits, workplace location, living and working conditions, or any significant costs to be charged to or born by the candidate*
- 6. Using recruiters that do not comply with local labor laws of the county in which the recruiting takes place*
- 7. Charging applicants candidate recruitment fees*
- 8. If required by law or contract, failing to provide or pay for return transportation at the end of employment*
- 9. If required by law or contract, failing to provide or arrange for housing that meets the housing and safety standards of the host country*
- 10. If required by law or contract, failing to provide an employment contract, recruitment agreement or other required document in writing*
- 11. If required by law or contract, failing to provide legally required and/or mutually agreed compensation and welfare*
- 12. Providing accommodations and/or employment for unauthorized entrants to the jurisdiction”*

[Modern Slavery Statement - Vantage Data Centers \(vantage-dc.com\)](http://vantage-dc.com)

**d) Anti-Bribery Anti-Corruption Policy:**

Vantage is committed to conducting its business in accordance with the highest ethical standards and in compliance with laws. To that end, Vantage has established an Anti-Corruption Policy that applies to all of Vantage’s directors, officers and employees and to any service provider, consultant, independent contractor, distributor, vendor, supplier or other third-party agent acting on behalf of Vantage. This Policy also applies to the operations of any joint venture or other business enterprise in which Vantage is a participant. Vantage

is committed to conducting business with honesty, integrity, and transparency. This means we do not offer, pay, solicit or accept bribes or kickbacks of any kind or in any form.

**e) Speak up Policy and Reporting:**

Vantage aims to maintain the highest standards of conduct and ethical behavior in all its business activities. Vantage “Speak Up” policy is designed to encourage employees to disclose any misconduct or improper practice, or any concerns they may have about potential misconduct or improper practice (“whistleblowing”), and to ensure a clear process and protection for those who do so. This policy applies to all Vantage employees, whether part-time or full-time and at any level of seniority. Strict compliance with this policy is expected of all company employees, contractors, consultants, customers, partners and third parties.

In addition, Vantage encourages anyone to report any violation of a Vantage policy and provides its stakeholders with detailed contact information and procedure to encourage reporting and maintains confidentiality. We do not tolerate any retaliation taken against any individual who has, in good faith, sought advice or reported any potential misconduct or a possible violation of the Vantage Policies.

**f) Reporting Policies:**

Vantage encourages anyone to report any violation of a Vantage policy. Such reports can be made to:

- Manager, contract manager or relationship manager
- Human Resources Canada: [Human\\_Resources-CAN@vantage-dc.com](mailto:Human_Resources-CAN@vantage-dc.com)
- Corporate Compliance: [Compliance@vantage-dc.com](mailto:Compliance@vantage-dc.com)
- the Vantage Whistleblower Hotline:
  - o Website: <https://vantage-dc.ethicspoint.com>
  - o Mobile: <https://vantagedcm.navexone.com>

**g) ESG Report, Emphasizing Global Commitment to Sustainability, Equity and Safety**

Company’s environmental, social and governance report highlights worldwide strategy to reduce carbon emissions across all scopes, encourage diversity and inclusion, and achieve “Vision Zero” as part of its environmental health and safety program. The report also puts emphasis on the importance of complying with the Vantage Code of conduct, including its areas about respect for individuals, human rights and fair labour, anti-corruption and anti-bribery measures and third-party due diligence.

We made the acknowledgement of our Code of conduct both more robust and simpler to complete and sign by taking the process securely online, with e-signature verification of both understanding and agreement on the part of employees. This interactive presentation of the Code of Conduct features video messages from executives and key team members that illustrate the intent and purpose of each aspect of the code.

Vantage Data Centers Publishes Second Annual ESG Report Emphasizing Global Commitment to Sustainability, Equity and Safety - Vantage Data Centers (vantage-dc.com)

## **5.2 Recruitment of Employees**

We have a recruitment process that ensures legal compliance and thorough candidate verification.

Before sending an employment contract, Vantage does a criminal background check on both provincial and federal levels for every employee. Occasionally, references from former employers are also checked. Then, before the beginning of the employment, Vantage requires from potential employees their social insurance numbers and two governmental pieces of identification, for validation. There are also criminal background checks required for certain employees and workers by Vantage's clients.

## **6. RISK ASSESSMENT**

We always strive to select the best suppliers and obtain the best possible conditions for our company. While price, reputation, and ability to supply goods or services are always considerations in the choice of suppliers, we also require suppliers to conduct their business ethically, fairly and in compliance with all applicable laws and regulations.

We only work with suppliers who meet our high standards of integrity, respect and transparency. Failure to comply with these standards, or with laws and regulations applicable to a supplier may result in termination of its relationship with Vantage.

Considering that our core business is to provide services and that we mostly procure our goods in Canada and the United States of America, where labour standards are strictly enforced, we believe that the likelihood of forced and child labour being used by our direct suppliers is limited.

Given our risk assessment process is ongoing and although we have not identified definitive risk areas in our supply chain, we understand that the manufacturing of the goods and products that we purchase from third parties (mostly indirectly) gives rise to the highest forced labour or child labour risks in our low-risk activities.

To mitigate such risks, we strive to establish a stable supply chain where we know when and where the goods that we purchase from a third party are manufactured. We firmly believe in achieving our goals by building trusting and sustainable relationships with our business partners.

Given that we have not identified any instances of forced labour or child labour in our activities and supply chains, no measures were taken to remediate such instances or to remediate the loss of income to the most vulnerable families that may result from such measures.

## **7. TRAINING AND CAPABILITY BUILDING**

We have implemented detailed training initiatives focused on Global TPRM Program (due diligence process), Code of Conduct, Anti-Bribery and Anti-Corruption, Workplace Violence and Aggression Prevention. All employees are required to successfully complete the trainings at the beginning of their employment at Vantage and then, for some courses, annually. Furthermore, we are now exploring the possibility of including training on forced labour and child labour in supply chains in our mandatory annual trainings.

## 8. ASSESSING THE EFFECTIVENESS OF OUR APPROACH

To ensure that forced labour and child labour are not being used in our business and supply chains, we proceed to regular review and update of our policies, and implement proactive changes in our processes as the underlying risks and/or regulatory requirements evolve. Vantage intends to evaluate its effectiveness in preventing and reducing the risks of forced and child labor in its supply chains in the future, considering the relevancy of the task.

This report was approved by the Board of Directors of Vantage Data Centers Canada Guarantor, ULC, general partner and acting for Vantage Data Centers Canada, Limited Partnership on May 31<sup>st</sup>, 2024, pursuant to paragraph 11 (4)(a) of the Act and constitutes our report for the financial year ending December 31<sup>st</sup>, 2023.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity identified in the first section of this report. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year indicated above.

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I have the authority to bind Vantage Data Centers Canada, Limited Partnership, acting via its general partner Vantage Data Centers Canada Guarantor ULC

DocuSigned by:

*Maxime Guévin*

Full name: Maxime Guévin

Title: Senior Vice President & General Manager SDC and Canada

Date: May 31, 2024





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*“IV. HUMAN AND LABOR RIGHTS*

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[Modern Slavery Statement - Vantage Data Centers \(vantage-dc.com\)](http://vantage-dc.com)

**d) Anti-Bribery Anti-Corruption Policy:**

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- Manager, contract manager or relationship manager
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- Corporate Compliance: [Compliance@vantage-dc.com](mailto:Compliance@vantage-dc.com)
- the Vantage Whistleblower Hotline:
  - o Website: <https://vantage-dc.ethicspoint.com>
  - o Mobile: <https://vantagedcm.navexone.com>

**g) ESG Report, Emphasizing Global Commitment to Sustainability, Equity and Safety**

Company's environmental, social and governance report highlights worldwide strategy to reduce carbon emissions across all scopes, encourage diversity and inclusion, and achieve "Vision Zero" as part of its environmental health and safety program. The report also puts emphasis on the importance of complying with the Vantage Code of conduct, including its areas about respect for individuals, human rights and fair labour, anti-corruption and anti-bribery measures and third-party due diligence.

We made the acknowledgement of our Code of conduct both more robust and simpler to complete and sign by taking the process securely online, with e-signature verification of both understanding and agreement on the part of employees. This interactive presentation of the Code of Conduct features video messages from executives and key team members that illustrate the intent and purpose of each aspect of the code.

Vantage Data Centers Publishes Second Annual ESG Report Emphasizing Global Commitment to Sustainability, Equity and Safety - Vantage Data Centers (vantage-dc.com)

## **5.2 Recruitment of Employees**

We have a recruitment process that ensures legal compliance and thorough candidate verification.

Before sending an employment contract, Vantage does a criminal background check on both provincial and federal levels for every employee. Occasionally, references from former employers are also checked. Then, before the beginning of the employment, Vantage requires from potential employees their social insurance numbers and two governmental pieces of identification, for validation. There are also criminal background checks required for certain employees and workers by Vantage's clients.

## **6. RISK ASSESSMENT**

We always strive to select the best suppliers and obtain the best possible conditions for our company. While price, reputation, and ability to supply goods or services are always considerations in the choice of suppliers, we also require suppliers to conduct their business ethically, fairly and in compliance with all applicable laws and regulations.

We only work with suppliers who meet our high standards of integrity, respect and transparency. Failure to comply with these standards, or with laws and regulations applicable to a supplier may result in termination of its relationship with Vantage.

Considering that our core business is to provide services and that we mostly procure our goods in Canada and the United States of America, where labour standards are strictly enforced, we believe that the likelihood of forced and child labour being used by our direct suppliers is limited.

Given our risk assessment process is ongoing and although we have not identified definitive risk areas in our supply chain, we understand that the manufacturing of the goods and products that we purchase from third parties (mostly indirectly) gives rise to the highest forced labour or child labour risks in our low-risk activities.

To mitigate such risks, we strive to establish a stable supply chain where we know when and where the goods that we purchase from a third party are manufactured. We firmly believe in achieving our goals by building trusting and sustainable relationships with our business partners.

Given that we have not identified any instances of forced labour or child labour in our activities and supply chains, no measures were taken to remediate such instances or to remediate the loss of income to the most vulnerable families that may result from such measures.

## **7. TRAINING AND CAPABILITY BUILDING**

We have implemented detailed training initiatives focused on Global TPRM Program (due diligence process), Code of Conduct, Anti-Bribery and Anti-Corruption, Workplace Violence and Aggression Prevention. All employees are required to successfully complete the trainings at the beginning of their employment at Vantage and then, for some courses, annually. Furthermore, we are now exploring the possibility of including training on forced labour and child labour in supply chains in our mandatory annual trainings.

## 8. ASSESSING THE EFFECTIVENESS OF OUR APPROACH

To ensure that forced labour and child labour are not being used in our business and supply chains, we proceed to regular review and update of our policies, and implement proactive changes in our processes as the underlying risks and/or regulatory requirements evolve. Vantage intends to evaluate its effectiveness in preventing and reducing the risks of forced and child labor in its supply chains in the future, considering the relevancy of the task.

This report was approved by the Board of Directors of Retained Vantage Data Centers Canada Issuer GP, ULC, general partner and acting for Vantage Data Centers Canada QC4, Limited Partnership on May 31<sup>st</sup>, 2024, pursuant to paragraph 11 (4)(a) of the Act and constitutes our report for the financial year ending December 31<sup>st</sup>, 2023.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity identified in the first section of this report. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year indicated above.

DS



I have the authority to bind Vantage Data Centers Canada QC4, Limited Partnership, acting via its general partner Retained Vantage Data Centers Canada Issuer GP, ULC

*Maxime Guévin*

Full name: Maxime Guévin

Title: Senior Vice President & General Manager SDC and Canada

Date: May 31, 2024