



**Vantage – Canadian Report on  
Forced Labour and Child Labour in Supply Chains Report  
Fiscal Year ending on December 31, 2025**

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**1. ABOUT THIS REPORT**

This third report relates to the financial year ending December 31, 2025. 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 to prevent and reduce the risk of forced labour or child labour in its business and supply chain and highlights the measures adopted during the last fiscal year.

**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**

**3.1 Strategic New Hire**

In 2025, Vantage appointed a new Global Director of Sustainability, with a broader remit over environmental, social, and governance matters. This new role will support the Company's efforts to integrate ESG considerations across its operations and supply-chain-related initiatives, including Vantage's obligations under Canadian supply-chain transparency legislation.

**3.2 Recent Improvements to Due Diligence and Vendor Screening**

In 2025, Vantage continued to evolve its third-party due diligence and supplier risk management framework as part of broader efforts to strengthen supply-chain transparency and oversight. As part of this evolution, responsibility for the initial information-gathering phase of supplier due diligence was aligned more closely with procurement operations, reflecting procurement's direct engagement with suppliers and its role in onboarding and lifecycle management. This alignment improved visibility into supplier relationships and enabled targeted enhancements to due-diligence questionnaires and intake processes.

Throughout 2025, Vantage also invested in strengthening its risk-management capabilities through enhancements to governance, role clarity, and technology enablement. These efforts included the modernization of business-verification procedures in the second quarter of 2025, and the migration of sanctions and restricted-party screening to a new vendor in the second half of 2025.

In parallel, additional tools were implemented to enhance supplier oversight across multiple risk dimensions. In the second half of 2025, environmental, health, and safety screening was transitioned to a new provider, with a phased global rollout completed by early 2026. In the third quarter of 2025, Vantage began deploying a new tool to optimize anti-money laundering, anti-corruption, international trade and sanctions compliance, including compliance with sanctions imposed on countries or regions with known risks of forced labour. In the fourth quarter of 2025, a new service provider was deployed to provide continuous, multi-tier supply-chain monitoring, covering financial, geopolitical, ESG, cyber, and disruption-related risks.

Collectively, these structural and technological enhancements support a more integrated and risk-based approach to third-party due diligence, improved visibility into supplier relationships, and more consistent identification and mitigation of risks across the supply chain, in alignment with Vantage's obligations under Canadian supply-chain transparency legislation.

### **3.3 Supply Chain Due Diligence and Vendor Screening**

Every new vendor who offers to provide services and/or goods to Vantage goes through a rigorous risk-driven due diligence process. As part of this process, we carry out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour, and require vendors doing business in high-risk jurisdictions and high-risk sectors (i.e. manufacturing, construction) or vendors who need to procure or use low skilled labour to complete an additional questionnaire designed to identify and address the use of forced labour and/or child labour in the organization's activities and supply chains.

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 practices 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. A vendor will be rejected if its risk profile is high and with limited to no control or visibility over its supply chain, or if the answers provided are considered unsatisfactory.

### **3.4 Ongoing Supplier Monitoring and Contractual Controls**

Only suppliers that are active in the Vantage system, and which have undergone the due diligence process outlined in the previous section, are eligible to receive a contract. Without an active

relationship with Vantage, a vendor is deactivated and must undergo the due diligence process anew.

Vantage also requires vendors, in most cases contractually, to abide by Vantage's supplier code of conduct and policies addressing forced and/or child labour. Failure to do so could lead to the termination of the business relationship by Vantage with such vendor.

Furthermore, through its Speak Up line and online platform, Vantage continues to have accessible grievance mechanisms that enable individuals inside and outside of the Company to report breaches of Company policies, including those related to forced and child labour.

As our procedures, policies and methods are subject to regular 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**

### **4.1 About Vantage**

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 41 sites, across the globe, on five different continents<sup>1</sup>.

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.

### **4.2 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.

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

Our direct suppliers also have their own value chain and although we may not currently 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 and/or child labour, which we periodically review and update to ensure alignment with industry best practices.

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

The Vantage Code of Conduct, last updated in June 2025, 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 to 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 stipulates 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 SUPPLIER CODE OF CONDUCT - Vantage Data Centers](#)

**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.

More specifically, this Policy states the following:

***“Policy Statement***

*Vantage strictly prohibits unlawful child labour, prison or forced labour, human trafficking, and physical punishment in accordance with the Vantage Code of Conduct, Vantage's Supplier Code of Conduct and our core values of transparency 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 labour 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 borne by the candidate*
6. *Using recruiters that do not comply with local labour laws of the country 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](#)

#### **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
- People and Culture, 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)
- Vantage Whistleblower Hotline (available to any concerned party):
  - o Website: <https://vantage-dc.ethicspoint.com>
  - o Mobile: <https://vantagedcm.navexone.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.

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 and transparent supply chain where we know when and where the goods that we purchase from a third party are manufactured

and constantly evaluate our sourcing practices. In this context, we engage our suppliers through targeted questions and encourage them to analyze their own supply chains to verify their compliance with our responsible sourcing requirements. We firmly believe in achieving our goals by building trusting and sustainable relationships with our business partners.

Given that we have not yet 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 (supplier due diligence process), Code of Conduct, Anti-Bribery and Anti-Corruption, and Workplace Violence and Aggression Prevention. All employees are required to successfully complete core trainings at the beginning of their employment at Vantage and then, for some courses, annually. Furthermore, we regularly review training to ensure that it is aligned with our Company's risk profile. As an example, Vantage has rolled out training on Physical Security at Vantage to promote appropriate working methods and conditions, and has introduced new and updated courses, including *"Defending Integrity at Vantage: Preventing and Reporting Fraud"* and *"Defending Integrity at Vantage: Anti-Money Laundering."*

## **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 is proud to announce the improvements made during its last fiscal year, as well as the upcoming enhancements on this topic. Vantage intends to evaluate its effectiveness in preventing and reducing the risks of forced and child labour 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 29, 2026, pursuant to paragraph 11 (4)(a) of the Act and constitutes our report for the financial year ending December 31, 2025.

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.

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

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Signed by:

*Maxime Guévin*

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Full name: Maxime Guévin  
Title: Director and President  
Date: May 29, 2026