# PHOENIX INFRASTRUCTURE, LLC MODERN SLAVERY STATEMENT



This statement is made, pursuant to Section 54 of the Modern Slavery Act of 2015, on behalf of Phoenix Infrastructure LLC, Phoenix UK Super Holdings Limited, and Cyxtera Technology UK Limited and their affiliates and subsidiaries, collectively referred to as "Centersquare," "we," "us," or "our."

Headquartered in Dallas, Texas, Centersquare enables digital infrastructure solutions for enterprises and service providers to optimize their infrastructure spend, drive

innovation, and connect worldwide. Catering to a diverse clientele, ranging from small businesses to large scale enterprises, Centersquare ensures compliance with industry regulations and guarantees unmatched uptime. With a footprint of over 50 data centers in 17 markets, we solve critical IT challenges for more than 2,400 customers around the world.

### **OUR COMMITMENT AND RESPECT FOR HUMAN RIGHTS**

Centersquare has a zero-tolerance approach to any form of modern slavery or human trafficking. We are committed to adhering to all applicable international human rights, labor and employment laws, including, but not limited to, laws relating to the protection of minority groups and women's rights, the right to water, child labor, forced or compulsory labor, work hours, wages and benefits, employment security, health and safety, freedom of association, discrimination, and harassment.

## LOW RISK OF MODERN SLAVERY AND HUMAN TRAFFICKING

Like other global businesses, we have an essential role to play in the global campaign to eradicate modern slavery and human trafficking. We consider the probability of modern slavery or human trafficking within our business and direct supply chain to be low. In evaluating Centersquare's risk of modern slavery or human trafficking, we took the following into account:

- The highly skilled workforce and functions undertaken across Centersquare, together with the competencies required to perform them reduce our vulnerability to modern slavery.
- Implementation of our policies and training of personnel, such as those related to whistleblowers, bribery, and corruption.
- We do not engage in supply chain operations in countries where there is a high prevalence of modern slavery, as determined by the Global Slavery Index; and
- Utilization of various methods to communicate our expectations to third parties with whom we do business.

### POLICIES AND PRINCIPLES RELEVANT TO MODERN SLAVERY AND HUMAN RIGHTS

Centersquare adheres to the following principles and policies in helping to protect human rights and eradicate practices constituting modern slavery, such as:

- <u>The Modern Slavery Statement</u> expresses our respect and support for protecting and promoting human rights, including those set forth in the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the International Labor Organizations.
- <u>Centersquare's Code of Business Conduct and Ethics (the "Code of Conduct")</u> applies to all employees, officers, and directors of Centersquare, regardless of their geographic location. The Code of Conduct covers a wide range of topics relevant to the protection of human rights, including forced labor, child labor, anti-retaliation, equal employment opportunity, harassment and discrimination, freedom of association,

workplace violence, protecting employee privacy, anti-money laundering, and anti-bribery and anti-corruption. In the event of non-compliance with the Code of Conduct, such as not reporting actual or suspected violations, disciplinary action may be taken.

- Centersquare has other formal policies that contribute to preventing modern slavery and human rights violations, including an Employee Handbook, an Anti-Harassment Policy, a Diversity Policy, an Environmental, Health, and Safety Policy, and a Procurement and Supplier Management Policy, among other relevant policies.
- <u>Centersquare's Supplier and Business Partner Code of Conduct</u> (the "Supplier Code") communicates our expectations on human rights and labor issues to our suppliers. Centersquare expects its suppliers and business partners to comply with the letter and spirit of all applicable labor laws and to implement and enforce effective systems and controls to prevent modern slavery and human trafficking within their own businesses and supply chains.
- Mandatory annual training requirements for all employees include completing training and certifying their adherence to the Code of Conduct as well as anti-harassment training.
- Centersquare's Helpline is one of several defined channels available to all directors, employees, and third parties to report actual or suspected violations of laws or regulations or Centersquare's policies. Centersquare's Helpline is available globally 24/7 in multiple languages, with the option of reporting anonymously through a web-based interface centersquaredc.ethicspoint.com or the UK toll-free number (0-800-89-0011) or other toll-free numbers available at centersquaredc.ethicspoint.com. Retaliation is not tolerated against anyone who reports actual or suspected violations in good faith or participates in investigations. To date, there have been no reports of modern slavery and human trafficking raised by employees or third parties associated with Centersquare.

### **OUR SUPPLY CHAIN**

Our supply chain operations are predominantly based in the United States where our headquarters is located. However, to support Centersquare's global operations, including our operations in the UK, Centersquare relies on various local and international vendors to provide support for several functional areas. These include electricity, cooling, network connectivity, security, monitoring systems, and provisioning servers.

### **DUE DILIGENCE AND CORRECTIVE ACTIONS**

We conduct due diligence before taking on new foreign suppliers and periodically review some of our existing ones. The Transparency International Index and Global Slavery Index are used as a framework for assessing risk. If Centersquare suspects or becomes aware that its existing suppliers violate modern slavery or human trafficking legislation, it will investigate and notify relevant authorities, if appropriate, and may take action, including terminating its relationship with the supplier.

This statement was approved on June 25, 2024.

—Docusigned by: Catherine Smith

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Catherine Smith

Corporate Secretary

Phoenix Infrastructure, LLC.