

VIRTUS SLAVERY, HUMAN TRAFFICKING AND SEX TRAFFICKING POLICY

VIRTUS Data Centres is committed to social responsibility and has a zero tolerance policy regarding Slavery, Human Trafficking and Sex Trafficking. Slavery, Human Trafficking and Sex Trafficking can be mutually defined as the recruitment, transportation, or harbouring of people, by means of use of force or other forms of coercion, of abduction to achieve the consent of a person having total control over another person, for the purposes of exploitation and free labour. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.

Based on Human Rights, Global Labour Standards, The Palermo Protocol (signed and ratified by The United Kingdom), The Modern Slavery Act 2015 and the Slavery Abolition Act 1833, VIRTUS Data Centres is dedicated to abolishing any Slavery, Human Trafficking and Sex Trafficking actions on all premises and the premises of our suppliers.

VIRTUS will communicate this policy within the company as well as to our key suppliers where we will demand an obligation to meet these requirements as an on-going condition of our business relationship. VIRTUS seek to control Slavery, Human Trafficking and Sex Trafficking in our areas of influence by:

- Publicising this policy to announce its support of legislation and prohibition of Slavery, Human Trafficking and Sex Trafficking on all premises and the premises of our direct supply chain
- Ensuring that all VIRTUS employees have a National Insurance Number
- Ensuring that all VIRTUS employed staff shall have active contracts defined and governed by UK Labour Laws
- If an employee of VIRTUS is suspected to be conducting Slavery, Human Trafficking or Sex Trafficking activities, or is suspected to be connected with such activities, VIRTUS will inform the relevant authorities. Any employment-related disciplinary investigations or procedures that may be necessary as a result will be governed by the terms represented in VIRTUS Contracts of Employment and employment policies.

VIRTUS Public				
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- If a key supplier is proven to be conducting Slavery, Human Trafficking or Sex Trafficking activities, or is proven to be connected with such actions, VIRTUS will report the offense to the relevant authorities and desist any ongoing association.

This policy shall be reviewed in the light of newly amended, applicable laws and regulations, and when it is deemed necessary to amend controls and interventions.

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