

VIRTUS ETHICAL TRADING POLICY

VIRTUS Data Centres recognises the responsibility that we share with our suppliers to ensure business and trading is conducted in an ethical manner. Predominantly, we want our customers to be confident that the personnel providing support services to VIRTUS are treated fairly, are not exploited and are not exposed to unsafe working conditions.

VIRTUS will monitor compliance with this policy through annual supply chain questionnaires administered by the compliance department against due diligence and any other vetting protocols, additionally through a range of other tools to support the risk management, continuous improvement and capacity building of our supply chain in order to meet agreements in principle and forthcoming agreements ensuring that VIRTUS maintains the patronage we require in a very progressive industry.

VIRTUS encourages and supports the continual development in supplier standards. We recognise that suppliers may need time to ensure compliance, however, all suppliers must demonstrate that any breach of applicable legislation, existing agreements and/or breaches against relevant VIRTUS policies is addressed in timescales appropriate to the severity. VIRTUS will work with suppliers to resolve ethical trading issues. If suppliers are unable or unwilling to address critical issues associated with any breach, this will be considered a material breach and we reserve the right to terminate the relationship in accordance with our contractual rights.

All suppliers are required to comply with the following:

- Demonstrate that any breaches are addressed in timescales and communicated appropriately to the severity and that systems are in place to ensure that they do not re-occur.
- The accurate completion of the annual VIRTUS Supply Chain Questionnaire and the appending of associated evidence of compliance, which shall be supported in evidence.
- Employment of their workforce is chosen freely;
 - I. There is no forced, bonded or involuntary prison labour.
 - II. Workers are not required to lodge identity papers.
 - III. Workers are free to leave their employment after reasonable notice.

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- Freedom of association and the right to collective bargaining are respected.
- Working conditions are safe and hygienic;
 - I. Adequate steps are taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as reasonably practicable the causes of hazards in the working environment.
 - II. Workers are provided with access to clean toilet facilities and to potable water, and, if appropriate sanitary facilities for food storage shall be provided.
 - III. A senior management representative shall be responsible for Health & Safety as an invested stakeholder within the operations of the business.
- Child labour shall not be used.
- Remuneration;
 - I. Wages and benefits meet, at a minimum, the national legal or industry benchmark standards.
 - II. All workers shall be provided with written and understandable information about their employment conditions and wages.
- Working hours are not excessive;
 - I. Working hours must comply with national laws and collective agreements.
- No discrimination is practiced.
- Harsh or inhumane treatment is prohibited.
- Only workers with a legal right to work in the country should be employed, which shall be evidenced upon request against ISO27001 standard

VIRTUS will communicate this policy within the company as well as to our direct suppliers where we will demand an obligation to meet these requirements as an on-going condition of our business relationship.

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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