



Modern Slavery Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Pure DC has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place within the business or in any of our supply chains.

This statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 and is intended to reflect the UK Government's updated statutory guidance on transparency in supply chains, including the expectation that organisations "know and show" how they identify and address modern slavery risks through ongoing, risk-based due diligence and continuous improvement.

Pure DC is a UK-headquartered organisation specialising in the design, construction, and operation of data centres across multiple global regions. We have operations across the UK, Europe, the Middle East, and Asia. Our organisational structure includes regional offices, and a network of subsidiaries, and our key supply chains include:

- Construction materials and services
- Mechanical and electrical equipment
- IT infrastructure and hardware
- Facilities management and cleaning services
- Professional services (legal, financial, consultancy)

Given the global nature of our operations, we recognise the risk of modern slavery in certain regions and sectors, particularly in construction and manufacturing. Our supply chains span multiple countries, and we recognise that some of these supply chains may carry a higher risk of modern slavery, particularly those involving outsourced labour or suppliers operating in high-risk regions, and we are committed to managing these risks proactively. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and require compliance with all applicable national and international anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force. We also expect that our contractors, suppliers and other business partners will hold their own suppliers to the same high standards.

To support these commitments, Pure DC has implemented the following policies:

- Anti-Slavery and Human Trafficking Policy
- Code of Conduct
- Whistleblowing Policy
- Group Procurement Policy

These policies are reviewed regularly and are communicated to all employees and key suppliers.

Pure Data Centres Group Limited
www.puredc.com

Registered name: Pure Data Centres Group Limited
Registered address: 5 Fleet Place, London, EC4M 7RD
Registered number: 08413665
VAT Registration GB 278 3164 78
Registered in England & Wales



Our Board has overall responsibility for ensuring our approach to modern slavery risk management is aligned with our legal and ethical obligations and that appropriate systems and controls are in place. Our governance, risk and compliance leadership supports implementation, monitoring and continuous improvement, working with Procurement and relevant subject matter teams (for example Sustainability, Health & Safety, and Information Security) through our supplier onboarding and due diligence processes.

Our supplier due diligence process includes risk-based escalation and subject-matter reviews, alongside supplier assurance checks and screening processes (including third-party diligence tools, where appropriate). We assess the risks of modern slavery, focussing on geographic and sector specific risks and the nature of the engagement (including the use of subcontractors). We require higher-risk suppliers to provide evidence of their controls (for example policies, declarations of compliance and recruitment practices) and, where appropriate, we may undertake enhanced monitoring such as additional information requests, audits or site visits.

During 2025, we reviewed our supplier due diligence processes to identify opportunities to further strengthen our approach to managing modern slavery risks across our supply chain. The review highlighted the importance of improving the quality and breadth of data available to support supplier risk assessments, particularly in relation to geographic, sector and supplier-specific risk factors. As a result, we began exploring enhanced risk intelligence and data-driven approaches to complement our existing due diligence and supplier assurance processes. This work was driven by a recognised need to improve the consistency and coverage of risk information, strengthen our ability to identify potential labour and human rights risks, and support a more targeted and risk-based approach to supplier monitoring and engagement.

To measure the effectiveness of our efforts to combat modern slavery, we monitor indicators such as the number of supplier audits completed, training completion rates, and any reported incidents of non-compliance. These indicators are reviewed annually and used to inform improvements to our policies and practices.

Training is provided to all staff to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business. Training is refreshed annually and updated to reflect emerging risks and best practices. In addition, our code of conduct establishes a set of common standards and business behaviours that everyone at Pure DC should follow, including our support of the principles set out in the United Nations Universal Declaration of Human Rights. We encourage a “speak up” culture and remind colleagues that they should not investigate suspected modern slavery issues themselves; the priority is to escalate concerns promptly through appropriate channels so that the matter can be assessed and managed safely.

This statement and the Pure DC Anti-Slavery and Human Trafficking Policy have been approved by the Board of Directors and are reviewed annually. They apply to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners. This statement covers the financial year ended 31 December 2025, and covers all Pure DC subsidiaries.

This statement was reviewed and approved by the Board of Directors on 7 July 2026.