

## Slavery and Human Trafficking Statement

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 (the Act) and sets out the steps that Bladeroom Holdings Ltd and its principle operating company Bladeroom Group Ltd (together “Bladeroom”) has taken, is continuing to take and also those that it intends to take to ensure that modern slavery or human trafficking is not taking place within its business or supply chain; modern slavery encompasses slavery, servitude, human trafficking and forced labour

Bladeroom is committed to acting ethically and with integrity and transparency in all business dealings.

### Our Business

This Slavery and Human Trafficking Statement applies to Bladeroom, a privately owned international provider of bespoke, highly energy efficient, modular data centres operating primarily in the UK, USA and Australia and its subsidiary Moduleco Ltd. The UK Group employs around 60 people.

As part of Bladeroom’s commitment to ensuring that there is no modern slavery or human trafficking in its business, be that directly or via its supply chains, it has the following internal policies to ensure that it is conducting business in an ethical and transparent manner:

- **Recruitment**  
Bladeroom conducts robust checks on any new employee including eligibility to work in the UK to safeguard against human trafficking or individuals being forced to work against their will.
- **Training**  
To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, appropriate training is provided to all employees.
- **Employee Engagement**  
All employees have an obligation to familiarise themselves with Bladeroom's Slavery and Human Trafficking Statement which is shortly to be included in the Employee Handbook forming part of their contract of employment.
- **Whistle blowing Policy**  
The business has a whistle blowing policy so that all employees can raise any concerns that they might have without fear of reprisals.

### Due Diligence for Slavery and Human Trafficking

Whilst there are no specific due diligence processes in place to identify and mitigate the risk modern slavery or human trafficking in its supply chain it is Bladeroom's intention to develop such processes during the coming 12 months and to have implemented them before the end of that period so as to ensure that, at that time, Bladeroom completes due diligence on its suppliers, where practicable, to satisfy itself that it is only trading with reputable organisations. Bladeroom will expect each entity in its supply chain to adopt ‘one-up’ due diligence on the next link in the chain for those organisations governed by the Act but it will not be practical for Bladeroom to have a direct relationship with all links in its supply chain.

Meanwhile, Bladeroom does not and will not knowingly support or deal with any business involved in slavery and human trafficking; it currently expects all those involved in its supply chain to be opposed to slavery and human trafficking and will continue to do so.

This statement was approved by the Board of Directors on 23<sup>rd</sup> March 2017 and is available on Bladeroom's website; it will be reviewed on an annual basis and updated if required