



Speak Up Policy



Speak Up Policy

Owner	Reviewer (where applicable)	Sponsor	Approver
Chief People and Culture Officer, Global	Global Corporate Compliance Chief Legal Officer	Chief People and Culture Officer, Global	Policy Review Committee

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1 Overview

We aim to maintain the highest standards of conduct and ethical behavior in all our business activities. This is echoed in our Core Value: “Trust, we communicate openly and honestly even when it’s challenging.”

We recognize that it is critical to our success as a company to encourage effective and open communication between managers, employees and other stakeholders. Our Speak Up Policy is designed to encourage employees to disclose any misconduct or malpractice, or any concerns they may have about any potential misconduct or malpractice (“whistleblowing”) and to ensure there is a clear process and protection for those who do so.

1.1 Purpose & Background

There may be occasions when you have concerns about what is happening in the workplace – these matters will usually be easily resolved. However, if the concern relates to potential or actual misconduct, you may feel some reluctance to raise or report your concerns for a variety of reasons.

Our Speak Up policy is designed to allow you to raise any concerns about actual or suspected breaches of our ethical and legal standards in confidence and with no repercussions or reprisals.

1.2 Scope

The policy applies to all employees of Vantage Data Centers whether your employment is part-time, full time, temporary, and at any level of seniority.

Strict adherence to this policy is expected of all company employees, contractors, consultants, clients, partners, and third parties.

1.3 Roles & Responsibilities

Below are the roles & responsibilities included in this Global Speak Up Policy:

Role	Responsibilities
Vantage Employee	All Vantage employees are responsible for reporting known or suspected wrongdoing to their Vantage Leader, Human Resources, Corporate Compliance, or through external reporting services provided by Vantage. Additionally, during the course of an investigation, employees may be engaged to provide details if it is believed that they may have information pertaining to the report. Employees are required to cooperate with investigations being conducted and provide all requested information.
Vantage Third Party	A Vantage Third Party is any individual, company or group that does business with Vantage. This may include, but is not limited to: Contractors, Vendors, Customers, & Consultants. Third parties are obligated to report known or suspected wrongdoing to Vantage through their Vantage contact or through the external reporting services provided by Vantage. If it is believed that a third party has information that pertains to an investigation, Vantage will work with the third party to gather information as necessary.

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Vantage Manager & Vantage Executives	Vantage Managers & Vantage Executives are responsible for receiving reports of wrongdoing from Vantage Employees and Third Parties and taking the appropriate actions including addressing and escalating issues.. "Vantage Managers and Executives shall immediately escalate any issues involving sexual harassment, discrimination, theft, bribery or any criminal offense to Human Resources."
Vantage Human Resources	Vantage Human Resources will receive reports of wrongdoing from Employees and Managers and will engage the appropriate resources to perform and/or assist in performing an investigation. They are also responsible for ensuring that reported issues are investigated as thoroughly and that all appropriate actions are completed at the conclusion of an investigation.
Vantage Speak Up Administrator	The Speak Up Administrator is responsible for the configuration of the external reporting Case Management System including automatic routing, Division/Region Assignment, User Management, and Administrator assignment activities. The Administrator(s) is able to see any report submitted as long as it does not name the Administrator directly, regardless of Region or reporting location. At Vantage, the Chief People and Culture Officer and Associate General Counsel – Corporate Compliance are the only designated Administrators
Vantage Speak Up Internal Investigator	The Speak Up Internal Investigator named by the Administrators receives reports that are assigned to them by the Administrator or through automatic routing within the Case Management System. Investigators are only able to see and interact with reports assigned to them.
External Investigator	Where appropriate or required for compliance purposes, Vantage may include outside investigator services to assist with/or perform an investigation of a submitted report. External investigators that are engaged are only provided access to the information that pertains to the specific investigation. All information obtained by an External investigator remains the property of Vantage and is returned to Vantage after the investigation is complete unless there are legal provisions that require external retention.
Vantage Speak Up Alternate Executive	Any report that is submitted that names a Vantage Speak Up Administrator directly in the report is routed to the Vantage Speak Up Alternate Executive for investigation. At Vantage this role is performed by the Chief Legal Officer.

1.4 Accountability

Implementation, management, and enforcement of this policy are the responsibility of the Human Resources Team. Review and approval of this policy will be made by stakeholders identified in the Approvers section of the title block. It is the intent of Vantage Data Centers that all policies will adhere to applicable law and will be consistent across the company.

1.5 General

This Policy is for guidance only and does not form part of your contract of employment. We may amend this Policy at any time or depart from it depending on the circumstances of the case.

2 The Policy

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You should report an issue or raise a concern where you genuinely feel that someone has acted or is likely to act in a way that their behavior could be considered as misconduct in the workplace.

Below are some examples of such behavior:

- A criminal offense or illegal activity (including theft, fraud, misappropriation, use or sale of drugs);
- Bribery and/or corruption;
- Tax evasion and/or the facilitation of tax evasion;
- Violence or threatened violence;
- Conduct in breach of any applicable law;
- Intentional misrepresentations;
- The use of deception to obtain an unjust or illegal financial advantage for Vantage Data Centers or any individual;
- Unsafe work practices that may endanger or cause harm to another employee or member of the public;
- Abuse of authority or breach of a Vantage Data Centers Code of Conduct or other company policy;
- Data protection concerns;
- Conduct that may cause loss to Vantage Data Centers or which is detrimental to Vantage Data Centers interests, including brand and reputation;
- Unethical behavior;
- The deliberate concealment of information about any of the matters listed above.

2.1 Reporting

All employees are encouraged to report activities believed to be illegal, dishonest, or unethical directly to their manager, Vantage Executive Leadership, Corporate Compliance, or Human Resources. Additionally, Vantage has partnered with an independent third party, NAVEX, to provide external independent reporting services for employees via phone, email, and web-entry. Employees may choose to remain anonymous when reporting concerns as is allowable by local regulations. All reports submitted either directly to a manager, Vantage Executive Leadership, Corporate Compliance, Human Resources, or through the NAVEX service are taken seriously and will be investigated the designated Vantage Investigator.

2.1.1 How to Report through NAVEX

Employees who choose to file reports through NAVEX can do so using any of the options below. When submitting a report, provide as much information as possible to assist in the investigation. When submitting your report, you can choose to provide your name and/or contact information with your report, but are not required to do so. If you choose to remain anonymous, you may also follow the instructions to set up a PIN code to check the status of your report, attach additional information to your report and receive updated information from the investigation.

Reporting Options:

- Via the website: <https://vantage-dc.ethicspoint.com>
- Via Telephone: country-specific numbers listed on <https://vantagedc.ethicspoint.com>

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2.2 Investigation

All reported concerns will be investigated fairly and in a manner consistent with the nature of the concerns reported. This may involve an internal inquiry or a more formal investigation. Employees are not responsible for investigating the activity or for any remediation or corrective measures; Vantage Investigators are charged with these responsibilities.

While investigating reports of wrongdoing that are reported directly to Vantage or through the third party service, it may be necessary to gather additional information from individuals with knowledge of the events contained in the report and/or from the reporting party. Any individual who is engaged in an investigation is required to maintain confidentiality of the event, the report, and may only discuss information pertaining to the event with the Vantage Investigator.

In the event that a report is submitted anonymously, the Vantage Investigator may request additional information through the NAVEX Case Management System. If the reporting party has set up a PIN number, they will be able to see the request for more information when they check the status of their report. If the additional information requested about an anonymous report is critical to the investigation and is not provided within 7 working days, the report may be closed due to insufficient information available to complete the investigation.

2.3 Safeguards

You are expected to keep confidential the fact that you have raised a concern, the nature of the concern, and the identity of those identified.

To the extent possible and where permitted by local laws, your identity and the fact that you have made a report will be kept confidential and no details of your participation in this process will be included in your employment file or any performance review.

Where the investigation requires the identification of the reporter, your identity is or becomes apparent in the course of the investigation, or where local law does not allow for anonymous reporting, you will be informed, and next steps will be discussed with you.

You will not be disadvantaged in your employment for making a report in accordance with this policy, nor will we tolerate any retaliation, repercussions, or reprisals against you. Vantage Data Centers will take all reasonable steps to ensure that anyone making a report in good faith is protected, and this protection will apply whether the matter is proven or not. If you believe you have been subject to detriment, please follow the grievance procedure immediately. If you are not satisfied with the explanation or reason given to you, you may raise the matter with the appropriate official organization or regulatory body.

2.3.1 Individuals Reporting Anonymously

If an individual desires to remain anonymous when submitting a report through NAVEX, their identity will remain anonymous unless they choose to share their identity with Vantage or it is legally required for the identity of the reporter to be shared with the subject of the investigation.

It is important that the fact that you made an anonymous report be kept confidential and not shared with anyone to maintain your anonymity. Additionally, in order not to jeopardize the investigation, you are expected to keep confidential the fact that you have raised a concern, the nature of your concern, and the identity of those involved.

If during the course of the investigation, you choose to share your identity with Vantage or if the investigator becomes aware of your identity due to the limited nature of the report, Vantage will take all reasonable steps to continue to protect your anonymity.

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2.3.2 Data Privacy & Data Handling

Vantage Data Centers is committed to appropriately managing all personal information and complying with all applicable privacy, security and data protection laws. Vantage is also committed to fostering a culture of transparency and accountability and demonstrating respect for individual privacy rights. We are committed to protecting all personal and confidential information that is entrusted to us. All information shared with Vantage throughout the reporting and investigation process is subject to the [Vantage Data Protection Policy](#) and the Vantage [Global Privacy Statement](#). These documents can be located on the Vantage Corporate SharePoint. <https://vantagedc.sharepoint.com>.

2.4 Disciplinary Action

If you raise a concern in good faith that later proves to be unfounded, you will still have the protection of this Policy in addition to any applicable law in your jurisdiction. However, if a report is not made in good faith, or is found to be malicious, deliberately misleading or frivolous, the whistleblower (Speak Up Reporter) may be subject to disciplinary action up to and including termination of their employment. The right of a whistleblower (Speak Up Reporter) for protection against retaliation does not include immunity for any personal wrongdoing.

If the claim of misconduct is substantiated by our investigation, appropriate disciplinary action will be taken against the responsible individual(s) up to and including termination of their employment.

2.5 Retaliation

We do not tolerate retaliation. We are committed to having a workplace where individuals are empowered to raise concerns in good faith without the fear of retaliation. Anyone who retaliates against an employee for refusing to do something that violates the Vantage Code of Conduct, Vantage policies, or the law, for raising a good faith concern, or for cooperating in an investigation will be subject to disciplinary action, up to and including termination of employment.

3 References

This section provides additional references that are relevant to this document.

3.1 Regulatory References

None

3.2 Vantage References

<https://vantage-dc.ethicspoint.com>

4 Document Control

The Chief People and Culture Officer, Global is responsible for ensuring the accuracy, relevance, and maintenance of this procedure. If you wish to see changes to this document, please forward your suggestions to the Chief People and Culture Officer, Global for review and inclusion as appropriate.

4.1 Revision History

Refer to the Vantage Control of Documents Procedure on the Vantage SharePoint for instructions on version control of documents.

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Date	Version	Revised Sections	Edited by	Approved By	Reason
12 July 2021	5.0	All	Kate Hyatt Shalini Sharma	Kate Hyatt	Updated document to apply globally for Vantage Data Centers
03 Apr 2024	6.0	All	Global Corporate Compliance	Policy Review Committee	Updated as annual review and change of title form Whistleblower Policy
14 Apr 2025	7.0	All	Global Corporate Compliance	Policy Review Committee	Annual review no changes

4.2 Annual Review

Last Annual Review:	14 Apr 2025	Next Annual Review:	13 Apr 2026
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