

# Environmental, Social & Governance Report



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# From The Chief Executive Officer



**Vincent English**  
Chief Executive Officer  
& Executive Director

Since the Company's founding in 2013, Megaport has set policies and procedures with a mind towards growing sustainably while minimizing our impact on the planet. From how we hire our staff, to our selection of equipment and vendors within our network, to how we secure customer data, and where we choose our global locations – everything we do has sustainability and environmental impact reduction in mind.

Environmental, Social, and Governance (ESG) is a broad term and in many respects, open to interpretation. Megaport simply sees ESG as how we interact with the world. While sustainability as a word is highly associated with the environmental aspects of ESG, we view good governance, customer-centricity, and the nurturing of our employees as critical to the sustainability of the Company and the communities in which we operate.

This sustainability report is our first step towards documenting how we approach all aspects of ESG. We endeavour to be as comprehensive as possible in describing our way of working, and in the same way we focus our everyday work around our people, we have focused our report in that manner as well.

As a born-in-the-cloud company, we have always been disruptive to traditional industry. Our pay-as-you-go model – the rent-versus-buy argument – means lower environmental and societal impact via greater efficiency in the allocation of existing resources is inherent to our business model. As a result, we have not, until now, measured carbon footprint reduction. This sustainability report has given us the opportunity to critically assess how we could improve in this regard moving forward.

The expression, "our staff are our greatest asset" has become somewhat devalued through overuse.

But as a low capex, small footprint company, our single greatest expense is our people. Their growth is Megaport's growth, and the Company has always invested heavily in the individual, personal, and professional development of all our colleagues. We view this investment as a benefit to the Company, not a cost.

As a global employer, we have diversity built in, which we celebrate and protect under the auspices of the Diversity, Equality, and Inclusion sub-committee of the Board. Because we do business in 25 countries, and are led by an executive management team that is 29% female, the Company has made inclusivity a priority both in hiring and in leadership. Our Women in Business initiatives further bolster our commitment to gender equity in the workplace worldwide, which is reflected in 29.6% of our employees being female (higher than the industry average of 19%).

While regulatory compliance forces corporate interest and activity in areas such as Modern Slavery and Data Privacy, we pride ourselves on being ahead of the curve, having implemented global best practices well in advance of legislative requirements in these areas.

We view ESG as indivisible from our business and who we are. As with everything we do, there will be a process of iterative improvement. Subsequent sustainability reports will track our success going forward.

# Our People

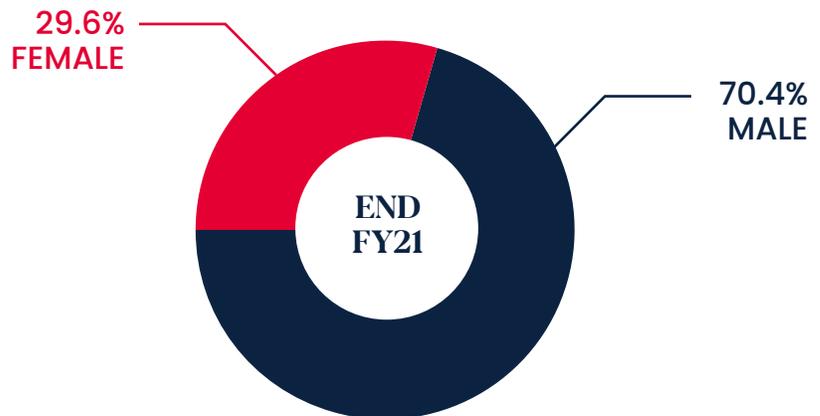


# Employee Stats

Our single greatest asset is our people. Their growth is Megaport's growth, and the Company has always invested heavily in the individual, personal, and professional development of all our colleagues.

## Who Makes Up The Megaport Workforce

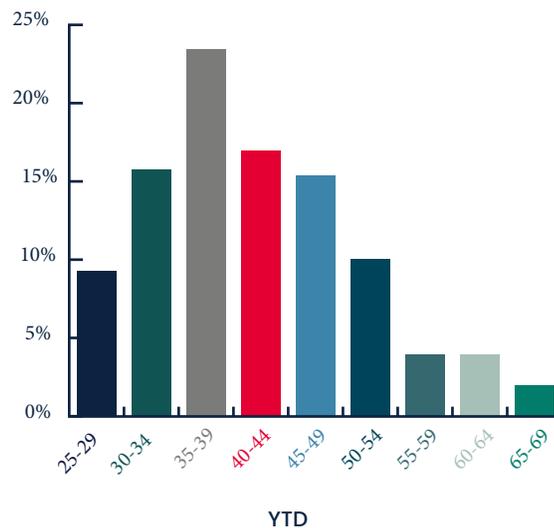
We ended FY21 with a 29.6% female workforce, well above the industry average, as reporting by *Tech Nation Report*.



## Millennials are Dominating the Workforce

Tech-savvy Millennials (born 1981-1996, 25-40 years) made up 48.6% of our workforce in FY21.

Engagement survey outcomes from this group have been given priority focus.



# Our Values

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## ACCELERATE

Our industry moves fast but we move faster. Our customers and partners need us to stay ahead of the curve to keep them ahead of the curve. With initiative and a 'can-do' attitude, we accelerate everything we do. We bring our authentic selves to work, and make a difference through our experience, talents, and ideas.

We deliver real-time services that enable customers and partners to quickly respond to a dynamic and ever-changing business environment.

### Operating Principles

- We take ownership
- We hold ourselves accountable
- We take responsibility
- We are agile & nimble
- We act with a sense of urgency
- We collaborate with and assist our colleagues



## INNOVATE

Innovation is in our DNA. Our shared knowledge accelerates our ability to innovate. Working together across the globe with a common purpose is the optimal way of innovating our products and brings forward the best of our experiences and creativity. We are at the leading edge of network and software technology and many of the top companies in the world choose us for our innovations.

### Operating Principles

- We question the status quo
- We consistently look for ways to improve
- We seek ideas from our colleagues



## COLLABORATE

Every success is a collective win and together we achieve more. With team members located around the world and from all backgrounds, we share a relentless focus on serving our customers and supporting each other. No matter the time zone, our spirit of collaboration endures.

### Operating Principles

- We break down technical and connectivity barriers to enable our customers and partners to work together seamlessly regardless of where they are in the world
- We respect and support each other
- We celebrate success together
- We communicate transparently ("say what you mean, mean what you say")
- We share information openly and proactively
- We empower our colleagues to succeed



## CELEBRATE

We love to play as a team, win together, and recognize our colleagues for their efforts and achievements. This value is reinforced through Recognition and Reward programmes celebrated quarterly and annually.

### Operating Principles

- We recognize our colleagues for their contributions
- We reinforce positive behaviors
- We celebrate our wins

# Our People

Our offices reflect our commitment to our values and reflect our lives by welcoming pets and children in the workplace.

## Staff Turnover

Megaport's attrition rate reduced from 28% in FY20 to 16.4% in FY21. Employees with five years' tenure increased from 3% in Q1 to 10% in Q4 – 26 employees were eligible for five-year service awards in FY21. We aim to continue reducing our attrition rate by acting on data collected from our annual Global Engagement Survey, which measures employee satisfaction.

## Global Engagement Survey & Benefits

Our annual Global Engagement Survey was conducted in April 2021 and follow-up surveys have been conducted every six months since. Our overall global engagement score was 82% with a participation rate of 88%. This is above the benchmark for a company of our size and maturity.\*

We have initiated steps to address key themes from the survey, particularly in the area of pay and reward. Specifically, we introduced the following;

- Introduced 12 weeks' paid parental leave across all regions, regardless of gender
- Extended the parental leave policy to offer 6 weeks' paid leave to both parents should they experience a stillbirth or 5 days' additional paid leave in the unfortunate event of a miscarriage
- Increased paid annual leave and pension contributions for our European Team Members
- Added private health care for UK and Ireland employees

## Health & Wellbeing

Our people are our priority. We make a number of support options available to our employees, and in the last 12 months have introduced or relaunched a range of benefits and resources to help us manage our own health and wellbeing and that of our colleagues and families including our Employee Assistance Program, and numerous education and training programmes.

## Health & Wellbeing: Employee Assistance Program ("EAP")

Through Acacia Health, we offer all employees and their family members access to confidential counseling and a support service to help deal with personal or work-related challenges. The service is available worldwide and involves short-term counseling of up to six hours per year per employee. This service is at no cost to the employee or their family member.

Employees are invited to attend EAP awareness sessions to understand the benefit of and how to access the service. In 2021, we held two awareness sessions with Acacia Health and 109 employees attended – almost half of all employees.

## Health & Wellbeing: Education and Training Programs

Also in 2021, we introduced our education series to build mental health literacy and help employees learn to identify the common signs and symptoms of mental health issues in themselves and others within the workplace. Over the course of the year, we ran 14 sessions across two timezones, led by health experts and mental health professionals on the following topics:

- Mental Health in the workplace
- The importance of social connection
- Adapting to change effectively
- Working from home effectively

130 employees attended and we will run the series again in 2022.

In addition to training all of our staff on a range of mental health topics, staff members were given the chance to volunteer to go through training to become mental health first aiders. These staff are distributed across our global workforce and all staff know they can reach out to a mental health first aider whenever they need support.

\*Benchmark Source: Culture Amp 2019-New-Tech-Benchmark-Mid-Sized

# Our People

## Diversity, Equality, and Inclusion (DE&I)

In February 2021 we launched MPI Changemakers. Our MPI Changemakers consists of a volunteer group of employees whose goal is to make a difference for our colleagues and our communities in relation to important social and workplace issues and causes that we are passionate about.

We identified our key themes together, with a focus on our objective of ensuring an inclusive workforce at Megaport. We currently have 40 contributing members and our top three priorities are:

- Increase representation of women at Megaport
- Celebrate our diversity
- Improve social connectedness and wellbeing

In association with MPI Changemakers, we launched our education series with the purpose of raising awareness of and creating a common language around Diversity, Equality and Inclusion and to create an awareness on why a diverse, equitable and inclusive workplace matters. The six-part series was co-designed with Leaders for Good and covered the following:

- What and Why DEI
- Inclusion
- Bias
- Inclusive Language
- Speaking Up
- Commitment

As an outcome of the series, we recorded a 30% increase in DEI confidence through the program with an average score of 'session value' of 4.3/5. The content has been repurposed as an online program and is wired into our onboarding program for new hires, ensuring continuity and sustainability of impact.

## Additional Benefits



Flexible Work Environments



Purchased Annual Leave Scheme



Shares Scheme for All Employees



Retirement Fund Contribution



Generous Study and Training Allowance



Birthday Leave



Equal Parental Leave



Casual Dress Code

# Our People

## The Megaport Educational Benefit

Permanent Megaport team members with a tenure of six months or more can access up to AUD\$5,000 annually to fund further study or training which will benefit them and provide further learning and development opportunities relevant to their current role or future career progression. Successful applications can also access up to five days of paid study leave per year.

We spoke to some Megaporters to find out how they have used their training allowance, and how it has benefited them.



### Chidozie Unachukwu

#### Who are you and what is your role at Megaport?

My name is Chidozie and I work in the Network Operations Engineering role at Megaport. I work from home in Kamloops, British Columbia, Canada.

#### What have you used your employee training allowance for?

Firstly, thanks to Megaport for the employee training allowance! I have used mine to pay for courses required for the renewal of my Cisco Certified Internetwork Expert (CCIE) Certification. To maintain an active CCIE certification status, I have to renew every three years.

#### What have you personally gained from this training and/or study?

Like other professions but at a very fast pace, the tech space is very dynamic. The courses I've taken so far have really helped to refresh and update my networking, automation, and cloud skills. Refreshing these skills is essential for my job and profession.

#### How has this training/study improved the way you carry out your job?

The training or study has been a refresher to my networking skills. It has also helped me with more foundational, in-depth / updated knowledge in my core networking and automation skills thereby enabling me better resolve escalated client issues and also contribute to the future design goals of Megaport's network.



### Sarah Lispet

#### Who are you and what is your role at Megaport?

I'm Sarah Lispet, Megaport's Content Marketing Manager; I run our blog and social media, and support Megaport's global and regional marketing campaigns.

#### What have you used your employee training allowance for?

I've used my allowance to go back to university part-time and level up my credentials. I'm completing a Graduate Certificate in Strategic Communications.

#### What have you personally gained from this training and/or study?

Not only has this course been a great refresher on how to run a successful communications campaign, it's giving me the skills to make better marketing decisions that will benefit Megaport as a whole, and help our audiences better understand who we are and what we are.

#### How has this training/study improved the way you carry out your job?

It has helped me make decisions more quickly and with far more confidence. It has also made me think a lot more about how we position ourselves in the market, and base my decisions on more informed research.



## Willy Gondim Lima

### Who are you and what is your role at Megaport?

My name is Willy Gondim Lima, I am 36 years of age and father of two little ones: Maeve, our five month-old girl and Toby, our two year-old furry Aussie Shepherd. Originally from Brazil, I have moved to Australia in 2012, when a one-year exchange program unexpectedly made Australia become my new home for about 10 years now and counting.

I proudly became a Megaporter almost three years ago, initially as an accountant. Halfway through, I moved from Finance to Procurement, joining the team as a Commercial Analyst.

### What have you used your employee training allowance for?

I have used my training allowance at Megaport towards a Master of Business Administration (MBA) at QUT.

### What have you personally gained from this training and/or study?

An MBA has been a long-time desire of mine and I finally made the decision to undertake the program back in 2020. MBA is a rather comprehensive program and, as such, it has been providing me with a far more holistic understanding of business operations and how the various pieces of the puzzle come together in order to create a thriving organisation. As a consequence, it has been enabling

me to be more confident at talking strategy, designing and articulating ideas and, most importantly, it builds my awareness around my strengths so that I can leverage them to create value to the operation, locally and broadly.

### How has this training/study improved the way you carry out your job?

As a Commercial Analyst for Network Procurement, I believe my MBA studies have had a positive impact on my analytical capabilities. Enhancing my ability to understand the strategy and direction given, analyse the status quo, identify areas of improvement and propose solutions that have potential to deliver the most value back to the business.

Additionally, I have also noticed a better sense of prioritisation through understanding what activities/tasks are truly meaningful to our department and to the business as a whole.



## Tina Tsui

### Who are you and what is your role at Megaport?

My name is Tina Tsui and you can also call me "SuperT". As the Head of Regional and Channel Marketing, my team and I are responsible for partner marketing and direct regional field engagements globally.

### What have you used your employee training allowance for?

I completed the Channel Company's annual Channel Masters Program in 2021 and am now an IPED certified Channel Master, as well as an official member of their community of 700+ channel professionals from 180+ vendor organizations. In January 2022, I started the Harvard Business School (HBS) Online learning track for "Leadership & Management" and have just completed one of the three courses last week.

### What have you personally gained from this training and/or study?

The Channel Masters Program was extremely timely as I stepped into an expanded role with global responsibility for channel marketing. I learned key concepts and essential components of a successful partner program, alongside industry veterans, and that enabled me to make informed decisions about our own PartnerVantage program. I had always wanted to become a better leader, to build and lead a high-performing team, and to bring the best out of everyone. The HBS leadership training does exactly that and has provided practical real-world frameworks for implementation at Megaport, such as organizational design components, root cause analysis, and CHANGE model.

### How do you plan to use this study to advance your career? What is your long-term goal?

To prepare for the next phase of my leadership journey, leading effectively at scale and scope. My motto is "be the message". I hope that by committing to lifelong learning and personal growth, I would become the best version of myself that's both unique and authentic.

## Competencies Relate to our Capability Framework



### WE ACCELERATE

#### Leadership

How we lead ourselves, our teams and our business. The reason people want to join us and stay.



### WE COLLABORATE

#### Communications and Stakeholder Management

How we build relationships internally, with our clients and in the market. Why people want to engage with us.



### WE INNOVATE

#### Technical Skills

What distinguishes us, keeps us competitive and ahead. Why we are the best.



### WE CELEBRATE

#### Results Orientation

How we drive results and recognize success. What is possible and what we achieve.

## Developing our People

In the last financial year we designed the Megaport capability framework to underpin development. We did this because unlocking business value requires employees to have functional skills, such as digital and analytics capabilities, as well as foundational and cross-cutting capabilities, particularly in leadership and the ability to inspire others as well as resilience and adaptability. Insights from exit surveys and engagement feedback tell us employees have also been asking for it.

The Megaport Capability Framework identifies core competencies critical for business success. The framework is built upon four overarching pillars of capability spanning 32 competencies. We invited employees to rate their current level of proficiency across a range of competencies. This assessment served as an input to development and career planning. Capability is key to developing talent and improving performance (individual and organizational) and all development should link to or be underpinned by a capability.

We also invited leaders to complete a 360 degree assessment. Our overall 360 leadership score was 4.10 out of a possible five, across 72 managers surveyed. The scores are in keeping with a company of our maturity.

### How Does Megaport Manage Performance?

Megaport's most important resource is our people who perform best with achievable and measurable goals, feedback and opportunities for success. The performance management process is an ongoing cycle requiring continuous realignment to support our Megaporters in meeting goals and objectives. All staff participate in annual goal-setting and reviews to drive personal and business performance. To support our people through the process, we developed a suite of learning materials and resources.

### Global Mobility Policy

As a global company, Megaport provides our employees with the opportunity to work in different office locations around the world to further develop capabilities and drive business growth.

### Global Mobility Falls into Two Categories at Megaport:

- Employer initiated assignments (for business critical or core business roles)
- Employee-initiated assignments (for career progression, personal or other reasons)

In FY21 we had six assignments in place across both categories.

### Grievance Reporting and Escalation Procedures

Megaport has a formal complaint procedure in place. This information is available for all employees to read in the Employee Handbook and explains that all employees have access to confidential escalation of grievances. Easy access to this service promotes and maintains a safe and comfortable work environment for all employees. Formal investigations may be conducted by a Contact Person or a person from outside Megaport (including legal representatives), appointed by Megaport.

# Environmental



Megaport



Hired Environmental, Social & Governance Manager



Created our Two-Year ESG Roadmap



Hired a Corporate Consultancy to Perform a Carbon Inventory on our FY22 Greenhouse Gas Emissions

## Megaport as a modern digital company has a significantly lower environmental impact than more traditional telecommunications enterprises.

The equipment utilised to establish our network is selected to be the most modern available with the lowest profile for space and power consumption. Not only does this enable Megaport to run an extremely efficient network, but in most instances, we consume less than 1% of the space and power draw of the data centres where we have a point of presence. Further, our use of campus cross connects allows us to further reduce our footprint by not requiring a point of presence drawing power in every data centre to which we can offer service. Running our global network consumes approximately 575kW/h or the equivalent of running about 38 electric vehicles. It is likely that the communications solutions we provide are very much lower in environmental impact than traditional telco connectivity, and a move to Megaport would support other enterprises in their ESG journey.

Megaport has always encouraged a flexible approach to where our staff wish to work from, and supported this through the use of technology. From the outset, more than 50% of our workforce has worked remotely, and a significant portion of our office based staff choose to work from home a proportion of their time. This has a significant cumulative impact on the total commute undertaken by our workforce. For those that do commute, we have shower facilities in offices for

anyone wishing to cycle or jog to work, encouraging low carbon behaviour for staff who wish to attend the collective workspace.

**Running our global network consumes approximately 575kW/h or the equivalent of running about 38 electric vehicles. It is likely that the communications solutions we provide are very much lower in environmental impact than traditional telco connectivity, and a move to Megaport would support other enterprises in their ESG journey.**

As we look to how to improve our environmental footprint in the future, we hired our first Environmental Social and Governance Manager in December 2021. First task was to create our two-year ESG Roadmap, which includes initiatives such as implementing carbon-neutral travel, and performing a carbon inventory on our FY22 greenhouse gas emissions. To do this, we have commissioned a third-party advisory service to help us complete our carbon inventory. This will allow us to set a baseline from which we could further improve our environmental impact. We will look to publish a roadmap in this regard in future publications to chart our progress.



**Megaport**

# Governance

# Directors & Company Secretary

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The following persons were directors of Megaport during the whole or part of the financial year and up to the date of this report.



**Bevan Slattery**  
Chairman &  
Non-Executive Director

Bevan Slattery, one of Australia's leading entrepreneurs, has founded some of the nation's biggest technology success stories. Starting as a co-founder of PIPE Networks, Australia's largest Internet Exchange and third-largest metropolitan fiber network provider, Slattery sold the Company to TPG in 2010. Slattery's entrepreneurial success is highlighted in having listed five companies on the Australian Securities Exchange and received many industry awards including EY Champion of Entrepreneurs Award in 2016, National Charles Todd Medal, and the Pearcey Foundations Benson Award as well as being inducted into the Commsday Hall of Fame in 2017.



**Vincent English**  
Chief Executive Officer  
& Executive Director

**Special responsibilities:**

- Member of the Innovation Committee

Vincent English is the Chief Executive Officer of Megaport and is also an Executive Director. Vincent joined Megaport in June 2015 in the early growth phase and held roles as Chief Financial Officer and Chief Operating Officer before being appointed as Chief Executive Officer in 2017. Vincent has a background in telecommunications and manufacturing industries with over 20 years' combined international expertise in Finance and Operations. His diversified experience deploys best practice on cost-efficient start-ups, growth-focused and profitable operations.

# Directors & Company Secretary

## BALANCED LEADERSHIP



4

MEN



3

WOMEN

5 Non-Executive  
& Independent Directors

1 Non-Executive  
& Affiliated Director

1 Executive Director



### **Glo Gordon**

Non-Executive Director

#### Special responsibilities:

- Member of the Remuneration & Nomination Committee (since 1 July 2021)
- Member of the Diversity & Inclusion Advisory Board (since 1 July 2021)

Glo has more than 20 years of experience as a senior global executive in business operations strategy and sales at large technology companies including Cisco, Oracle, SAP, and Xerox. She is currently CEO and board member of MATRIX, a leading 5G digital commerce company in Silicon Valley.



### **Michael Klayko**

Non-Executive Director

#### Special responsibilities:

- Member of the Innovation Committee (since 1 June 2021)

Michael Klayko has over 40 years of experience in the data storage, computer, technology and telecommunications industries. During his tenure as CEO of Brocade, he grew the Company revenues from less than US\$500 million to over US\$2.2 billion. Additionally, he has held leadership and executive positions at leading technology companies including Rhapsody Networks, McDATA Corporation, EMC Corporation, Hewlett Packard, and IBM.

# Directors & Company Secretary

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## **Naomi Seddon**

Non-Executive Director

### **Special responsibilities:**

- Lead Independent Director
- Chair of the Remuneration & Nomination Committee
- Member of the Audit & Risk Committee
- Chair of the Diversity & Inclusion Advisory Board (since 1 July 2021)

Naomi Seddon is an Australian, US, and NZ qualified lawyer and is a Partner with the global law firm, Littler Mendelson. With a focus on providing international legal solutions to companies that are looking at market entry, Naomi has extensive experience assisting companies to enter and grow in new markets including advising on global migration, local employment, data protection and privacy, pay equity, and equal employment opportunity issues.



## **Melinda Snowden**

Non-Executive Director

### **Special responsibilities:**

- Chair of the Audit & Risk Committee (since 1 June 2021) - industry expert
- Member of the Diversity & Inclusion Advisory Board (since 1 July 2021)

Melinda has 27 years of experience in finance and has been a professional Non-Executive Director since 2010 in a broad range of industries. Melinda is currently a Non-Executive Director and Chair of the Audit and Risk Committee of ASX listed companies WAM Leaders and Best & Less Group Holdings. Melinda is also currently a Non-Executive Director of Newmark REIT Management, and an advisory board member of Yarno, a SaaS compliance and education provider.

# Directors & Company Secretary

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**Jay Adelson**  
Non-Executive Director

**Special responsibilities:**

- Chair of the Innovation Committee
- Chair of the Audit & Risk Committee (until 1 June 2021)
- Member of the Audit & Risk Committee (since 1 June 2021)
- Member of the Remuneration & Nomination Committee

Jay Adelson has over 25 years of experience in technology and internet businesses globally. Jay co-founded Equinix (NASDAQ:EQIX) in 1998, and was responsible for the original and sustaining business model that grew it into one of the largest data center companies in the world. Jay was also instrumental in the establishment and operation of the original Palo Alto Internet Exchange for Digital Equipment Corporation in 1996.



**Celia Pheasant**  
Company Secretary

Celia Pheasant is an experienced in-house information and communications technology lawyer with more than 25 years of legal experience. Celia has served in her current capacity as Company Secretary for Megaport since 2015 and is responsible for the corporate governance of its subsidiaries in 25 countries globally. Celia is also General Counsel for Soda, an origination and execution service provider for diverse technology and digital infrastructure businesses.

## Diversity & Inclusion Advisory Board

On 1 July 2021, Megaport formed a new advisory board to focus on Diversity and Inclusion initiatives, reporting to Chief Executive Officer, Mr Vincent English. The initial members of the advisory board are Ms Seddon, Ms Snowden, and Ms Gordon.

We are focused on all elements of w/inclusion. Megaport has committed to a female gender target of 30% which is significantly higher than the tech industry benchmark of 19% (source: *Tech Nation Report 2021*). We are close (29.6%) to achieving our benchmark of 30% female gender. We have fulfilled our commitment to increase the number of females on the

Megaport Board which now stands at 50% of the Non-Executive Directors on the Board. In addition to gender, we have developed networks and sought partners to help us achieve several dimensions of inclusion. This includes supporting different racial representation and the LGBTIQ community, and the generational variances that come with having a workforce spanning four generations.

## Modern Slavery Act

Megaport is projected to meet the criteria for compliance with the Australian Modern Slavery Act 2010 (Cth) (the Act) within FY23. The Board of Directors and the Executive Team has been briefed and a Working Group has been formed, with executive oversight provided by the General Counsel. Megaport is preparing to release its first public statement under the Act by 31 December 2022.

## Whistleblower Policy & Procedure

Megaport has enacted a comprehensive Whistleblower Policy & Procedure that applies to all employees. Megaport received advice from specialist external counsel on best practice and to ensure that the Policy & Procedure aligned with local laws. Information on the Policy & Procedure is detailed in the Global Employee Handbook. This is made available to all employees during the onboarding process and is easily accessible on the people management system, Workday, and knowledge management system, Confluence.

## Anti-Bribery & Corruption Policy

Megaport conducts its business in an ethical manner and operates a zero tolerance policy to bribery and corruption. We have Board approved policies and procedures in place to maintain compliance with the UK Bribery Act 2010 and the US Foreign and Corrupt Practices Act. We provide guidance to our employees and business partners on how to recognize and report instances of bribery and corruption. We expect our employees and business partners to maintain the highest standards of ethical conduct and integrity and to comply with the letter and spirit of all applicable laws. All employees have access to our full Bribery and Anti-Corruption Policy via our internal intranet as well as the Global Employee Handbook and all employees receive bribery and anti-corruption training during their Corporate Induction with refresher training mandated annually. All business partners that sell Megaport services on our behalf (resellers) or otherwise represent us in the market (agents and referrers) are subject to pre-contract Due Diligence and a Business Partner Assessment.

# 4

**AUDIT AND RISK  
COMMITTEE  
MEETINGS**

# 6

**REMUNERATION  
& NOMINATION  
MEETINGS**

# 4

**INNOVATION  
COMMITTEE  
MEETINGS**

# Privacy & Data Security

## Information Security and Privacy

Megaport is committed to safeguarding its information technology assets and data and those of our customers. We have adopted a privacy by design approach to all systems and processes, in order to comply with global telecommunications and privacy laws and as a matter of good business practice.

Megaport's services involve the use of fiber-optic networks to provide data transmission services to business customers. This involves the automatic split-second transmission of binary data packets (i.e. 1s and 0s). We hold basic customer and service-related data for account management, billing and support purposes, including customer representative contact details. We never sell customer data.

Our privacy policies and procedures are compliant with General Data Protection Regulations (GDPR). Megaport holds all necessary telecommunications licenses and registrations in the countries we operate in.

Megaport's Information Security Risk Committee (ISRC) operates at an executive level and is accountable for key decisions to drive continuous improvement in these areas. In December 2020, Megaport achieved ISO/IEC 27001 certification from the International Organization for Standardization (ISO).

In support of this, Megaport has highly experienced Information Security and Privacy Teams dedicated to developing and enforcing processes to ensure security of Megaport's information and technology assets and

compliance with relevant laws. This team is responsible for the Megaport Information Security Policy and associated policies, processes, procedures, and standards, and regularly reports to the ISRC. The Privacy Team is responsible for Megaport's Privacy Programme, including the internal Personal Data Protection Policy and related processes. It advises both the Information Security Team and ISRC on security requirements specific to personal data.

All Megaport employees receive training in Information Security and Privacy during induction and on an ongoing annual basis.

# Thank You

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Megaport acknowledges the Traditional Owners of Country throughout Australia. We recognise Aboriginal and Torres Strait Islander peoples' continuing connection to land, waters, culturally important sites, knowledge, art, objects, and places. We pay our respects to them, their heritage and cultures; and to elders both past and present.

