

United Kingdom Modern Slavery Statement for the Fiscal Year ended 31 December 2025

Introduction

This Statement describes how STACK Infrastructure EMEA met our commitment during Fiscal Year 2025 to assess and address the risk of modern slavery in our operations and our supply chains pursuant to the [Modern Slavery Act 2015](#).

STACK EMEA structure and business operations

STACK is a trusted global partner in digital infrastructure, delivering scalable, AI/ML and Cloud data center solutions to tackle global challenges with speed, scale, certainty, and responsibility. With a client-first focus, conscientious development and operational practices, we empower innovative companies to tackle their demand curve.

We prioritize innovative design and advanced engineering to provide a solution our clients need. We also know it's important to be a responsible member of the communities in which we operate while supporting client principles. This combination allows us to build resilient infrastructure that supports long-term client success, meets evolving technological demands, and fosters local partnerships.

STACK Infrastructure EMEA is headquartered in London, UK. The Chief Executive Officer of STACK EMEA is based at the organization's head office in London. As of December 2025, STACK EMEA is operating or developing data centres in Denmark, Germany, Italy, Norway, Sweden and Switzerland.

Certifications

STACK holds the certifications ISO 9001, ISO 14001, ISO 45001, and ISO 27001, SOC2 and PCI DSS, across the business which requires conscious and systematic efforts on quality, working environment, external environment, and information security. Our quality system is regularly updated to ensure compliance with applicable laws and regulations.



Workplace Culture

STACK EMEA is committed to fostering an open, well-structured, and inclusive working environment that promotes diversity, upholds mutual trust, respects human rights, and believes in promoting non-discrimination. In line with our Social Impact strategy, we actively champion equity, accessibility, inclusive hiring practices, and meaningful opportunities to promote underrepresented groups across our workforce.

We recruit, employ, and promote individuals based on their ability to meet the competencies required to perform each role effectively. This ensures equal opportunities for candidates of all backgrounds and identities.

STACK EMEA is committed to honesty, fairness, courtesy, and mutual respect in all interactions with colleagues, partners, and other stakeholders. We collectively and individually stand against any behaviour that creates an intimidating, hostile, or offensive work environment. To support this, STACK EMEA has implemented an independent Whistle blower Service to ensure that all grievances are addressed confidentially and with full protection for the reporting individual.

Our [Code of Ethics and Business Integrity](#) reinforces these commitments by setting expectations for honesty, fairness, privacy protection, workplace safety, and respectful behaviour.

Human Rights

STACK EMEA is committed to respecting internationally recognised human rights in our own operations and in our business relationships.

Respect and dignity

We are committed to treating people with dignity and respect and to maintaining a workplace free from discrimination, harassment, bullying and victimisation.

Safe and healthy work

We are committed to providing safe and healthy working conditions and to managing health and safety risks in our operations.

No forced labour, child labour or human trafficking

We prohibit forced labour, bonded labour, prison labour, human trafficking, child labour and any form of involuntary work in our operations. We expect the same from those working with or for us.

Freedom of association

We respect employees' rights to join, or choose not to join, lawful worker organisations and to engage in collective dialogue in accordance with applicable laws.



Fair working conditions

We seek to comply with applicable employment, wage, working time and immigration laws and to maintain working conditions that respect the rights and wellbeing of our people.

Privacy and personal data

We respect privacy rights and handle personal data responsibly and in accordance with applicable data protection laws and internal policies.

Supply Chain and Contractor Standards

The relationship between STACK EMEA and its suppliers is an important component to achieving high performance across our business.

STACK EMEA expects suppliers to operate responsibly, uphold ethical labour standards, and respect human rights throughout their operations and supply chains. We select our Suppliers and Subcontractors based on merit considering among other things, the price, quality, safety, labour, and human rights practices, delivery capability, reputation for service, integrity, and their overall relationship with STACK EMEA. Furthermore, selection is documented in our purchasing process.

We enforce strict, non-negotiable provisions within our supplier contracts to ensure that every supply chain partner expressly agrees to comply with all applicable laws relating to modern slavery and anti-human trafficking. Every supply chain partner must ensure that each of its sub-contractors and sub-consultants also comply with all applicable trafficking, anti-slavery, child labour, slave labour, prison or any other form of forced labour laws. Every supplier must warrant and represent that neither the supplier nor any of its officers or employees have been convicted of violating any human trafficking or anti-slavery laws, statutes or regulations.

We conduct regular audits and assessments to verify working conditions and environmental practices across our work sites and supply chain.

As members of the United Nations Global Compact, we monitor our operations to ensure there is always room for improvement and make positive contributions to the community and our stakeholders.

Safe Reporting

At STACK, we are committed to maintaining the highest standards of integrity, transparency, and accountability across all areas of our business. We believe that fostering an open and honest culture is fundamental to our long-term success and to maintaining the trust of our employees, clients, partners, and investors.



We maintain a robust, confidential, and easily accessible [Whistleblowing Channel](#), administered by an independent provider. Anyone - including employees, former employees, contractors, suppliers, subcontractors, partners and other stakeholders - can report concerns online, by phone, or via email, using such secure third-party system designed to ensure objectivity, anonymity and confidentiality.

STACK EMEA strictly prohibits retaliation, harassment, or victimisation against anyone raising concerns in good faith. This is reinforced in our Code of Ethics and Business Integrity and applies across all EMEA regions.

A handwritten signature in black ink, appearing to read 'M. Kitts'.

Martina Kitts

Chief Legal Officer, STACK Infrastructure EMEA