

# Megaport Modern Slavery Statement 2025

# Modern Slavery Statement 2025

This statement is made by Megaport Limited (**Megaport**) for the financial year ending 30 June 2025. This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and section 14(1) of the Modern Slavery Act 2018 (Cth).

The reporting entities covered by this statement are identified in the Appendix.

## Our operations and supply chain

Megaport is an ASX-listed global Network-as-a-Service provider, founded in 2013 and headquartered in Brisbane, Australia. During the reporting period, Megaport operated in 26 countries, employed 350 people, and reported total revenue of AUD \$227 million.

Megaport's business model is services- and software-driven. Our operations are centred on providing scalable, secure, and flexible network connectivity solutions to enterprise customers globally.

Most of our staff are located in Australia and the United States. While our workforce is directly employed and primarily based in low-risk jurisdictions, we acknowledge that risks may still arise through our reliance on certain service providers and contractors further down our supply chain. These include the manufacture and provision of hardware, cloud infrastructure equipment, and components where raw materials and assembly may occur in higher-risk jurisdictions, as well as service-provider and contractor arrangements, particularly where subcontracting or multi-layered supplier relationships increase complexity and reduce transparency. As Megaport expands into new jurisdictions and introduces new third-party vendors, the risk of encountering suppliers with inadequate modern slavery safeguards increases.

## Assessing our actions

We regularly monitor, review, and report on our activities to ensure our actions effectively reduce modern slavery risks.

Some key indicators used to measure effectiveness include the number of employees completing compliance and ethics training and the integration of modern slavery considerations into procurement and vendor onboarding processes.

Outcomes are also reported to senior management, enabling continuous improvement and accountability. Where gaps or areas for enhancement are identified, targeted actions are taken to strengthen controls and further reduce risk exposure.

## Consultation process between Megaport entities

Megaport wholly owns 100% of its global subsidiaries and works closely with these entities to ensure a consistent approach to identifying and addressing modern slavery risks.

Consultation occurs through regular engagement between the Board, executive team, and regional teams to align risk assessments, due diligence practices, and supplier management processes across all operating entities. Cross-functional collaboration, including legal, finance, procurement, and compliance teams, supports the integration of modern slavery considerations into our business operations.

## What we've done to address the risks

During the reporting period, we have taken a range of steps to assess and mitigate modern slavery risks across our operations and supply chains.

Our legal, compliance and procurement teams have grown, enabling additional capacity to conduct due diligence, review supplier contracts and ensure that modern slavery mitigation measures are integrated into procurement and onboarding processes. We have maintained a strong focus on educating staff on modern slavery risks and their responsibilities in identifying, reporting and responding, ensuring that awareness and accountability are embedded throughout the organisation.

These initiatives complement our existing Supplier Code of Conduct, which sets out our expectations for ethical business practices, labour standards, and human rights.

We continue to strengthen mechanisms for reporting concerns. Our Whistleblowing Policy provides a secure and confidential channel for staff to raise any ethical or compliance issues, including suspected modern slavery. As part of this process, during the reporting period all staff were required to review and acknowledge the updated policy, reinforcing our commitment to transparency and enabling staff to take an active role in safeguarding against modern slavery. A copy of our updated Whistleblowing Policy is available on our website here: [megaport.com/investor/leadership-governance/](https://megaport.com/investor/leadership-governance/)

## Looking forward

During the next financial year, Megaport will continue to strengthen its approach to identifying and mitigating modern slavery risks.

We will:

- develop a dedicated internal modern slavery resource hub that provides educational resources to strengthen understanding and awareness of responsible practices across all teams;
- introduce internal periodic spot checks of modern slavery compliance, including reviews of supplier documentation and Supplier Code of Conduct acknowledgements, and procurement workflows to verify adherence and identify areas for improvement; and

- issue a refresher email to our executive team highlighting modern slavery priorities and leadership responsibilities in upholding our human rights commitments.

This Statement will be published on our intranet and website.

This Statement was approved by the Megaport Board of Directors and is signed on its behalf by the Chair, Melinda Snowden.



---

Melinda Snowden (Dec 15, 2025 20:28:46 GMT+11)

**Melinda Snowden**

**Chair**

**Megaport Limited**

## ***Appendix - Reporting entities***

### *Modern Slavery Act 2018 (Cth)*

Megaport Limited

Megaport (Services) Pty Ltd

Megaport (Australia) Pty Ltd

### *Modern Slavery Act 2015 (UK)*

Megaport (UK) Limited

Megaport (Europe) Limited

European Voice Link Limited