



2024 Report

Fighting Against Forced Labor and Child Labor in Supply Chains

Introduction

Cologix Canada and its affiliated entities listed below (collectively, “**Cologix**”) strongly supports Canadian and worldwide efforts to identify and eliminate any source of forced labor or child labor in supply chains and to promote human rights for all. Cologix categorically prohibits any use of forced labor or child labor in its own operations, and in the operations of its direct and indirect suppliers. This report describes Cologix’s efforts to prevent and reduce the risk that forced labor or child labor is used at any step of the production of goods in Canada or elsewhere.

Structure, Activities, and Supply Chains

Cologix is North America’s leading network-neutral interconnection and hyperscale edge data center company, operating facilities in Quebec, Ontario, and British Columbia. Cologix’s facilities provide industry-leading data center and colocation facilities, and its supply chains consist primarily of manufacturers of heavy equipment such as generators and chilled water units, as well as metalwork products such as equipment cages and server racks.

Policies and Due Diligence Processes

Cologix has a strict zero-tolerance policy regarding the use of forced labor and child labor. Both its internal Code of Ethics and external Supplier Code of Conduct categorically prohibit the use of forced labor or child labor (in addition to prohibiting other violations of human rights). Cologix obtains equipment exclusively from reputable manufacturers, and services from reputable companies with a history of successfully operating in the local market. Fortunately, to Cologix’s knowledge, its supply chain remains free from any use of forced labor or child labor.

Every potential supplier providing goods or services to Cologix is required to complete an extensive questionnaire describing the supplier’s policies, their supply chains, and their history with respect to public and private enforcement actions. Every supplier is required to maintain and enforce policies prohibiting the use or profit from forced labor, child labor, and other human rights violations. Any supplier found in violation of Cologix’s Supplier Code of Conduct is terminated as a supplier, and where appropriate Cologix will provide information to relevant governmental authorities to take corrective action.

Parts of Business and Supply Chains Carrying a Risk of Forced Labor or Child Labor

Cologix identified equipment manufacturers as the primary source of risk that forced labor or child labor is used in its supply chain. Where Cologix purchases equipment, it selects manufacturers with a proven history

of product performance and supply chain stability. Though Cologix is confident its equipment manufacturers do not use forced labor or child labor, there is a risk the manufacturers' direct and indirect component suppliers may use forced labor or child labor at some stage in the supply chain. Cologix relies on manufacturer statements that they do not use forced labor or child labor in their supply chains and they use appropriate means of investigating and confirming their component suppliers do not use forced labor or child labor.

Cologix also identified contract service providers (including facility-specific security, maintenance, and janitorial staff) as a source of risk for using forced labor or child labor in connection with supplying services. Cologix uses reputable service providers who indicate they pay all employees and contractors they hire market rates and comply with applicable labor laws.

Remediation Measures

During its previous financial year, Cologix did not identify any instances of forced labor or child labor used in its organization or in its supply chain. Accordingly, Cologix had no occasion to remediate the use of forced labor or child labor, or the loss of income to the most vulnerable families that results from remediation measures to eliminate the use of forced labor or child labor.

Employee Training

Cologix employees receive quarterly training with respect to the company's policies, including policies prohibiting the use of forced labor and child labor in any portion of the company or its supply chain.

Self-Assessments

Cologix regularly evaluates its supplier questionnaire to determine whether it should obtain additional information regarding a supplier's business, background, or supply chain. Cologix will continue conducting such evaluations as and when appropriate.

Reporting Entities

This report is a joint report submitted on behalf of the following entities: Cologix Canada, Inc., a Nova Scotia corporation; Data Centers Holding GP Inc., an Ontario corporation; Data Centers Holding Limited Partnership, a Quebec limited partnership; Cologix Canadian Issuer Limited Partnership, an Ontario limited partnership; Cologix Canadian Issuer GP Inc., an Ontario corporation; 2772 Natal Street Holdings, Ltd., a British Columbia corporation; Cologix Clegg Road Partner Inc., a Nova Scotia corporation; Cologix-CRO ON Limited Partnership, an Ontario limited partnership; Cologix-CRO ON GP Inc., an Ontario corporation; and Cologix Clegg Road GP Inc., a Nova Scotia corporation. Each entity employs the same methods and policies with respect to preventing and reducing the risk that forced labor or child labor is used.

Attestation

This report was approved by the Board of Directors of Cologix, Inc., the direct or indirect controlling parent company of each reporting entity. Set forth below is the signature of Dawn Smith attesting to such approval.



[Dawn Smith \(May 22, 2024 11:55 EDT\)](#)

Dawn Smith,
Director,
Cologix, Inc.