

Code of Conduct – All Employees

Purpose

At NEXTDC, we are committed to conducting our business with integrity, transparency, and accountability. This Code of Conduct ('Code') sets out the minimum standards expected of all employees and representatives. It complements our company values, *Customer First*, *One Team*, *Bright Ideas*, *Straight Talk*, *Pursuit of Excellence*, and *Frugal Not Cheap*, and guides how we interact with each other, our customers, partners, and the broader community.

Breaches of this Code may result in disciplinary action against the employee, including dismissal in serious cases. If you have any queries regarding this Code, please contact the Head of People & Culture or the Chief Risk Officer/ Company Secretary.

Scope

This Code applies to all employees, directors, officers, representatives, contractors, consultants, and business partners of NEXTDC. You are responsible for reading, understanding, and acknowledging this Code (including the related policies, standards, and guidelines) annually, or as otherwise required by NEXTDC.

This Code does not alter any legal or contractual obligations you may have with NEXTDC. Rather, it sets out the minimum standards of behaviour expected from you.

NEXTDC Values

While this Code outlines specific behavioural expectations, it cannot cover every situation. When faced with ambiguity, employees are expected to be guided by NEXTDC's core values. These values reflect the behaviours and mindsets we expect from all employees and support ethical decision-making at all levels.



CUSTOMER FIRST

We are obsessed with delivering the world's best customer experience.



ONE TEAM

We are an elite team, working together with super stars in every position.



BRIGHT IDEAS

The best way to predict the future is to create it.



STRAIGHT TALK

We don't talk bullshit, we have crucial conversations, we disagree and then we commit.



PURSUIT OF EXCELLENCE

We are relentless in our pursuit of excellence.



FRUGAL NOT CHEAP

We spend our money where it matters the most.

NEXTDC Code of Conduct

All employees are expected to:

Conduct & Integrity

- Act ethically, honestly, and with integrity at all times.
- Exercise care, diligence, and professionalism in the performance of your duties.
- Give honest, accurate information in all communications. Do not mislead by statement or omission.

Compliance

- Understand and comply with this Code, all NEXTDC policies and procedures, and applicable laws and regulations.
- Follow all lawful and reasonable directions from those with proper authority.

Respect & Inclusion

- Treat others with respect, courtesy, and fairness at all times.
- Not engage in any form of harassment, bullying or unlawful discrimination.

Confidentiality & Privacy

- Protect NEXTDC and third-party confidential information.
- Use or share confidential information only as authorised - even after your employment ends.
- Safeguard the privacy of employee, customer, and supplier data in accordance with relevant privacy laws and policies.

Ethical Business Practices

- Do not engage in or tolerate bribery or corrupt conduct - including by third parties acting on NEXTDC's behalf.
- Avoid actual, potential, or perceived conflicts of interest, and disclose any such interests promptly.

Use of Resources

- Use NEXTDC's property, systems and resources responsibly and only for legitimate business purposes.
- Sustainability & Safety
- Promote and maintain a safe and healthy working environment, including reporting any injuries, hazards, or unsafe conditions.
- Act in an environmentally responsible manner and support NEXTDC's sustainability goals.

Reporting Misconduct

- Promptly report any actual or suspected breaches of this Code to the Head of People & Culture or the Chief Risk Officer / Company Secretary.
- Reports made in good faith will be handled confidentially and you will not face victimisation for raising genuine concerns.

Our Policies

All employees must be familiar with and comply with NEXTDC's internal policies. These policies support this Code and form part of your responsibilities as an employee. Key policies include:

- Anti-Bribery and Corruption Policy
- Conflict of Interest Policy
- Corporate Social Responsibility Policy
- Diversity, Equity and Inclusion Policy
- Drug and Alcohol Policy

- Equal Opportunity, Discrimination, Harassment and Victimisation Policy
- Whistleblower Policy
- Continuous Disclosure Policy
- Securities Trading Policy
- Social Media Policy
- Privacy Policy
- Work Health & Safety (WHS) Policy
- Environmental Sustainability and Energy Policy
- Human Rights Policy

Reporting Concerns

NEXTDC is committed to fostering a workplace where employees feel respected, safe, and supported when raising genuine concerns about misconduct. Every employee is responsible for upholding this Code and reporting any concerns about actual or suspected misconduct, unethical behaviour, or breaches of this Code or our policies. Concerns raised in good faith will be investigated promptly, fairly, and in accordance with this Code and applicable policies, including the Anti-Bribery and Corruption Policy and the Whistleblower Policy. Victimisation against individuals who report misconduct in good faith will not be tolerated.