



N E X T D C

# FY25 Modern Slavery Statement

1 July 2024 to 30 June 2025 | NEXTDC Limited | ABN 35 143 582 521



## Contents

About this Report	3
A letter from the Chairman and CEO	3
FY25 Highlights	4
About NEXTDC	5
Corporate Governance	6
Our Structure, Business Operations and Supply Chain	7
Modern Slavery Framework	8
Relevant Policies	8
Modern Slavery Risks	9
Risks by Categories and Sector	9
Due Diligence	10
Remediation	11
Looking Forward	11
Assessing Effectiveness	11
Consultation	11
Appendix A: Requirement Index	12

## About this Report

This report has been prepared for our stakeholders, including employees, investors, community groups, government, suppliers, and customers. It is made in accordance with the *Modern Slavery Act 2018* (Cth), for the financial year 1 July 2024 to 30 June 2025 (FY25). This Report covers all our operations unless otherwise stated. All references to our, we, us, the Company and NEXTDC refer to NEXTDC Limited (ABN 35 143 582 521) and its subsidiaries.

This report outlines the actions NEXTDC has taken to further understand, assess, and mitigate modern slavery risks across our operations and supply chain. Upholding ethical and transparent labour practices remains fundamental to how we operate, and NEXTDC maintains a zero-tolerance stance toward all forms of modern slavery. The NEXTDC Board approved this statement on 17 December 2025. All inquiries or feedback on this statement should be directed to NEXTDC's Procurement and Compliance team at [all.procurement@nextdc.com](mailto:all.procurement@nextdc.com).

### FY25 annual reporting suite



This **Modern Slavery Statement** explains how we identify, manage, and mitigate modern slavery risks within our operations and supply chains (our next update will be issued in December 2026).



Our **ESG Report** outlines the material sustainability risks and opportunities relevant to NEXTDC, along with our performance and the actions we are taking to manage our impacts and contributions across the economy, environment and society.



Our **Sustainability Data Pack** provides an overview of key sustainability metrics and maps the report to the Global Reporting Initiative (GRI) framework.



The **Climate and Nature Report** is focused on climate-related and nature-related risks and opportunities. This report supports our transition from the TCFD framework to the new mandatory Australian Sustainability Reporting Standards (ASRS) under AASB S2 and the TNFD framework, providing investors with information on our climate and nature-related resilience, adaptation, and scenario planning.



Our **Corporate Governance Statement** describes our corporate governance framework, including key policies and practices.



The **Annual Report**, our primary disclosure document, describes our business strategy, financial review and statements, approach to remuneration and key governance disclosures.

## A letter from the Chairman and CEO

At NEXTDC, we remain steadfast in our commitment to operating with the highest ethical standards. As part of this responsibility, we are pleased to present our Modern Slavery Statement for the financial year ending 30 June 2025.

Our commitment to ethical business practices is grounded in the United Nations Guiding Principles on Business and Human Rights. As NEXTDC continues to grow and expand across the Asia Pacific region, including our increasing presence in Malaysia, we recognise the heightened importance of understanding and managing modern slavery risks. Malaysia has been a key focus area as we deepen our regional footprint, and we remain committed to ensuring that our operations and our supply chain partners uphold the principles of fairness, dignity, and respect.

This year's statement outlines the actions we are taking to identify, assess, and mitigate modern slavery risks, including:

- **Robust Due Diligence:** Conducting rigorous assessments of our suppliers and partners to identify and address potential risks.
- **Ethical Sourcing:** Prioritising ethical sourcing and collaborating with suppliers who share our commitment to human rights.
- **Employee Welfare:** Ensuring safe, fair, and equitable working conditions for all employees across our regions.
- **Transparency and Accountability:** Remaining open about our practices and holding ourselves accountable to the standards we set.

As we expand into new markets, we recognise the critical role we play in contributing to responsible and sustainable business practices. Our growing engagement in Malaysia reinforces our dedication to continuous improvement and our responsibility to safeguard human rights wherever we operate.

We will continue to strengthen our data collection, monitoring, and analysis to evaluate the effectiveness of our anti-modern slavery initiatives. While we did not identify any specific instances of modern slavery during the reporting period, we acknowledge the pervasive nature of this global issue and remain vigilant in our efforts to prevent and address it.

We are committed to doing our part to create a more just, safe, and equitable world, today and into the future.

**Douglas Flynn**  
Chairman

**Craig Scroggie**  
Chief Executive Officer



## FY25 Highlights



Published our fifth Modern Slavery Statement in December 2024 that disclose risks, actions, and performance metrics.



Conducted targeted modern slavery risk assessments across our supplier base, including detailed reviews of high-risk tier-one suppliers. This included onsite audits of key Malaysian construction suppliers using our Supplier Audit Tool, assessing labour practices alongside worker living conditions, accommodation quality, access to basic amenities, and overall wellbeing.



Strengthened due diligence processes for potential suppliers across Asia, recognising the heightened risk profile in jurisdictions where current and future development is concentrated.



The Modern Slavery Workgroup continued to lead and coordinate our efforts across operations and supply chains, with an increased focus on the Asia Pacific region as our footprint expands.



Delivered mandatory modern slavery training to all employees, with additional targeted training for teams involved in our Malaysian construction activities to improve awareness of local risks, expected safeguards, and early identification of red flags.



Engaged proactively with existing and prospective suppliers on modern slavery expectations. During the Malaysian construction tender processes, we reinforced strict compliance with NEXTDC's standards and ensured suppliers understood our zero-tolerance approach. Engagement also continued with external stakeholders, including investors and customers.

# About NEXTDC

NEXTDC Limited is Australia's leading data centre provider, delivering mission-critical power, security, and connectivity for global cloud platforms, enterprises, and government. Our Uptime Institute-certified facilities guarantee 100% uptime, with sustainability embedded in design and operations to ensure industry-leading efficiency. NEXTDC Limited is a public company listed on the Australian Securities Exchange (ASX:NXT). Headquartered in Brisbane, NEXTDC operates 17 world-class data centres across Australia, with four more under development (two in Australia, one each in Malaysia and Japan). A further seven facilities are in planning and several others under evaluation across Australia, New Zealand and Asia.

NEXTDC is also a recognised sustainability leader, having pioneered energy-efficient, renewable-powered, and climate-resilient facilities across Australia. Our achievements are supported by industry recognition for innovation, resilience, and environmental leadership. Further details on our operations, strategic market drivers and financial performance can be found in the NEXTDC FY25 Annual Report, available via the Investor section of our website: [www.nextdc.com](http://www.nextdc.com).



## Our corporate values

At NEXTDC, our corporate values are not just words on a page. They are the behaviours we value most in our team. We embrace these values as the attributes by which we recognise, reward, hire, fire and promote our people. Our commitment to our values, ethics, and compliance fosters a culture that, we believe, attracts the highest-calibre employees, and builds and enhances our customer relationships.

Our Board of Directors sets the tone for culture and accountability, ensuring our values are embedded in everything we do. These values guide our approach to modern slavery and human rights across our operations, supply chain, partnerships, and workforce. We are mindful of our impact on colleagues, suppliers, customers, and the communities in which we operate, and are committed to:

- Respecting diversity and local cultures, including the heritage and rights of Indigenous peoples.
- Engaging stakeholders on human rights issues and providing accessible mechanisms to resolve grievances.
- Upholding fair working conditions and remuneration for all employees.
- Prohibiting forced, compulsory, or child labour and ensuring such practices are not tolerated in our supply chain.
- Eliminating harassment and discrimination in any form.
- Providing human rights and cultural training to all personnel.
- Communicating our human rights commitments clearly to all stakeholders.



### Living our values

We aspire for our six core values to be lived by every person in our business. We celebrate stories that bring these values to life and empower our people to call out behaviours that don't align.



#### Customer First

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



#### One Team

We are an elite team working together with superstars playing in every position.



#### Bright Ideas

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



#### Pursuit of Excellence

We are relentless in our pursuit of excellence, not perfection.



#### Straight Talk

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



#### Frugal Not Cheap

We spend our money where it matters the most.

## Corporate Governance

At NEXTDC, a strong corporate governance framework underpins our approach to managing modern slavery risks. Through clear board oversight, executive accountability, and robust risk management processes, we are able to identify, assess, and mitigate these risks effectively. Our governance approach includes regular reporting, transparent engagement with stakeholders, and a commitment to continuous improvement. Collaboration across business units ensures a coordinated and consistent approach to modern slavery management.

NEXTDC works with a wide range of product and service providers, particularly in the design, construction, operation, and maintenance of our data centres. All suppliers are required to comply with our Supplier Code of Conduct, which incorporates our Human Rights Policy and modern slavery expectations. During the procurement process, we prioritise suppliers who demonstrate best practices, verified through our selection process. Once appointed, suppliers are subject to ongoing assurance activities to confirm continued compliance with the Code.

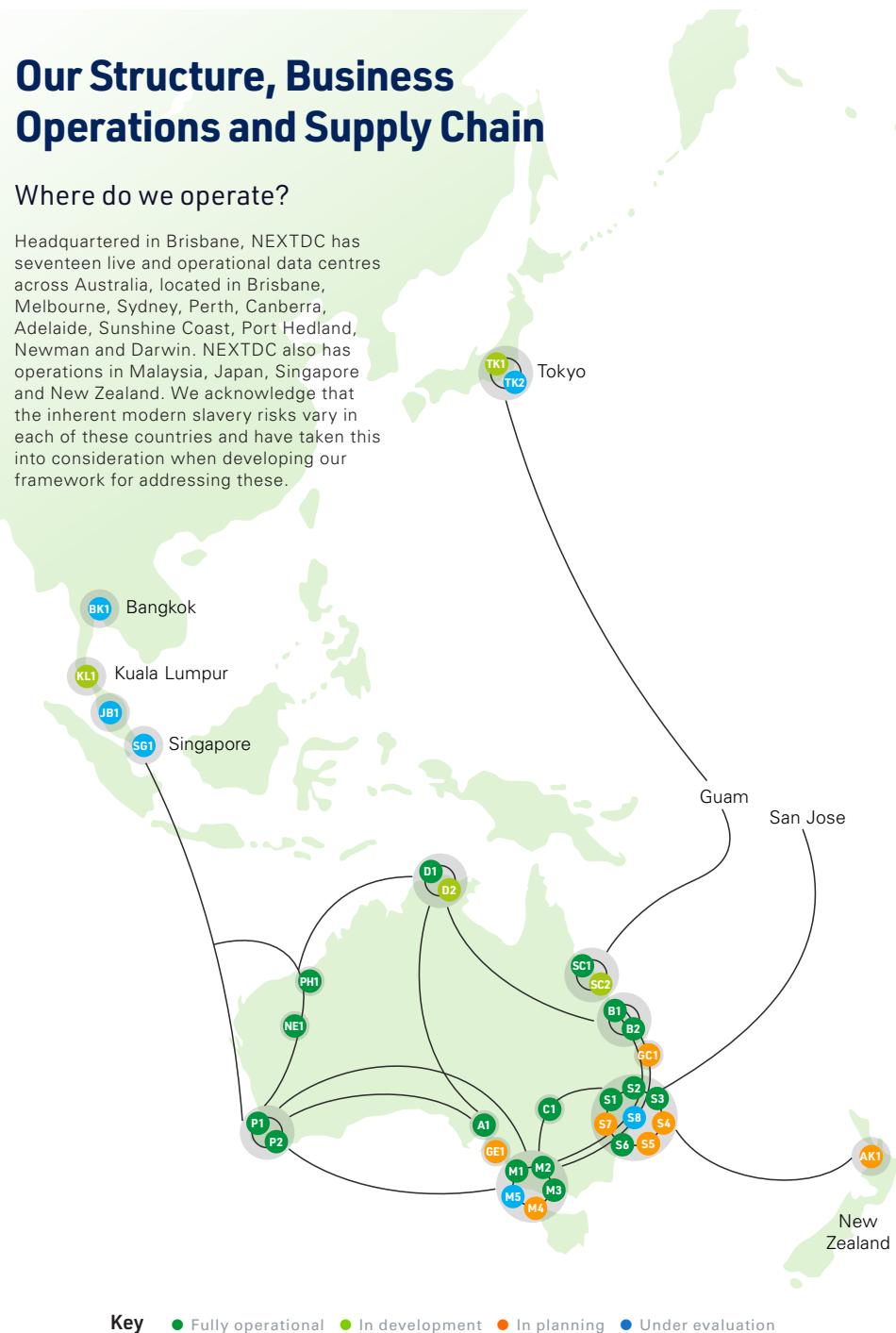
We take social responsibility and ethical conduct seriously, going beyond legal obligations to promote transparency, integrity, and accountability across all operations. Our values, detailed in this statement, guide our commitment to upholding the highest standards. More information on our governance approach can be found in our FY25 Corporate Governance Statement at [www.nextdc.com](http://www.nextdc.com).



## Our Structure, Business Operations and Supply Chain

## Where do we operate?

Headquartered in Brisbane, NEXTDC has seventeen live and operational data centres across Australia, located in Brisbane, Melbourne, Sydney, Perth, Canberra, Adelaide, Sunshine Coast, Port Hedland, Newman and Darwin. NEXTDC also has operations in Malaysia, Japan, Singapore and New Zealand. We acknowledge that the inherent modern slavery risks vary in each of these countries and have taken this into consideration when developing our framework for addressing these.



## Our supply chain

The goods and services that we source primarily relate to the development and construction of data centres, the operation and maintenance of our existing sites and a range of corporate enablement services such as the provision of office space, professional services and information technology. Our major categories of spend include:

- Construction
- Critical data centre plant and equipment (i.e., electrical and cooling systems etc)
- Energy and Utilities
- Facility Operations (including maintenance and repairs)
- Real Estate
- Professional Services
- Information Technology and Communications
- Marketing
- Travel and Entertainment

During FY25, more than 92% of the tier one suppliers we transacted with were incorporated in Australia, although some of these goods and services originated from overseas locations. The remaining overseas related procurement included suppliers based in New Zealand, Canada, Germany, France, Malaysia, United Arab Emirates, Ireland, Japan, Netherlands, Singapore, Thailand, the United Kingdom and the United States.

The majority of our core supply-chain workforce comprises directly employed staff. However, in certain circumstances, suppliers also engage contract labour, lower-skilled workers, and, on occasion, migrant workers for specific projects where existing labour capacity is insufficient.

In FY25 we transacted with 847 suppliers (including government agencies) a total of \$1.9 billion



94% of our spend was with suppliers who are incorporated and located in Australia



92% of our annual  
spend in FY25 was  
consolidated amongst  
top 50 first tier  
suppliers



92% of our active supplier base in FY25 were located within Australia



## Modern Slavery Framework

NEXTDC's comprehensive framework on Modern Slavery policies and procedures, is outlined below and seeks to promote an active and inquisitive approach to identifying risks and ensuring we do not support transactions involving Modern Slavery in any form. NEXTDC's Procurement Policy sets out how we procure and manage third parties across the business and has been established in accordance with the core principles of our Procurement Framework.

Our standard processes now include a risk assessment for new procurement activities and due diligence for new suppliers as required. This has been particularly important as we have expanded our supply chain to support the development of our next generation of data centres and our operations in Asia. We have now incorporated these activities into the selection of suppliers and consider this to be a critical element of our tendering process.



## Relevant Policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations. Each of these policies is reviewed annually and endorsed by the Board as appropriate.

All the policies are available on NEXTDC's website, at [www.nextdc.com](http://www.nextdc.com).

### Employee Code of Conduct

NEXTDC Board endorsed Codes of Conduct (the Codes), governance framework, and supporting policies and procedures are available in the Corporate Governance section of our website [www.nextdc.com](http://www.nextdc.com). NEXTDC's commitment to using ethical labour and eliminating modern slavery in our operations and supply chain is articulated in these documents. NEXTDC will not knowingly permit any human slavery or similar abuse to enter NEXTDC's operations or supply chain. Suppliers that are found to be in breach of these principles will not be tolerated.

### Human Rights Policy

NEXTDC's Human Rights Policy outlines our commitment to embedding respect for human rights across all aspects of our operations, ensuring compliance with applicable regulatory requirements wherever we operate. This commitment is particularly important as we expand in Asia and in the construction sector, where materials and services are sourced from a diverse range of suppliers and regions.

The Policy applies to all NEXTDC employees, contractors, and suppliers, including personnel on our worksites, using our facilities, or interacting with our teams. Developed in line with the United Nations Guiding Principles on Business and Human Rights, it establishes that NEXTDC will not tolerate slavery, forced, compulsory or child labour in our operations or supply chain. The Policy also reinforces our commitment to a robust due diligence program to prevent, identify, mitigate and address any breaches.

We expect our suppliers and partners to uphold these principles and encourage them to adopt similar human rights practices within their own businesses.

Oversight of the Policy rests with NEXTDC's Board of Directors, with the Board kept informed of any breaches and the remedial actions taken, demonstrating our unwavering commitment to responsible and ethical business practices.

### Supplier Code of Conduct

The NEXTDC Supplier Code of Conduct sets out the behaviours and practices we expect from our suppliers. This includes our expectation that our suppliers will operate in a responsible manner on social, environmental, and ethical issues and comply with all applicable laws and regulations, including labour and child labour laws. Our view is that these expectations should also apply to their own supply chain and sub-contractors. NEXTDC reserves the right to audit suppliers and their operations with adequate notice. Should a supplier fail to comply with the Supplier Code of Conduct or specific contractual obligations, remedial action may be taken, up to and including termination of the contract. We review the Supplier Code of Conduct at least annually to ensure it remains relevant and fully reflects our human rights principles. In addition, we engage regularly with suppliers to discuss human rights expectations, reinforcing our commitment and ensuring these standards are clearly understood throughout our supply chain.

### Whistleblower Policy

NEXTDC is committed to fostering a culture of compliance and ethical behaviour. We want all employees, contractors, and stakeholders to feel safe to speak up about any genuine concerns, without fear of reprisal. Our Whistleblower Policy, available to everyone on our website, explains how concerns can be raised, with clear procedures and multiple reporting channels in place.

The Head of People and Culture acts as our Whistleblower Protection Officer, ensuring anyone who reports misconduct is protected from disadvantage. Where it's not possible or appropriate to report through this channel, the Chair of the Audit and Risk Management Committee (ARMC) serves as an additional independent escalation point. The Board is kept informed of any significant matters reported under the Policy.

NEXTDC will not tolerate anyone being discouraged from speaking up or being treated unfairly for doing the right thing and reporting misconduct.

# Modern Slavery Risks

## Our Risk Management Framework

NEXTDC recognises that operating data centres across Australia, Malaysia, Japan and the broader Asia-Pacific region involves inherent risks. Effectively managing these risks, including modern slavery and human rights risks, is critical to supporting long-term sustainable growth.

Our Board-approved risk management framework, aligned with ISO 31000, provides a structured approach to identifying, assessing, and mitigating modern slavery risks across operations, supply chains, and partnerships. It informs supplier selection, ongoing assurance, employee practices, and targeted training programs, ensuring proactive management and continuous improvement.

For more details on our approach, refer to the Risk Management Policy, FY25 Environmental, Social and Governance Report, and FY25 Corporate Governance Statement available under the Corporate Governance section of our website at [www.nextdc.com](http://www.nextdc.com).

## Identification and assessment of modern slavery risks in the supply chain

Our primary human rights risk lies within the supply chain for our data centre construction and operations. While we prioritise direct suppliers, we acknowledge the vulnerability of our indirect supply chain. To mitigate this risk, we actively engage with direct suppliers, scrutinise their management systems, and strive for increased visibility into the origin of goods and services before they reach NEXTDC.

Throughout FY25, we maintained a focus on high-risk suppliers, conducting thorough due diligence to identify potential risks and opportunities for improvement. We remain committed to staying informed about modern slavery risks within these relationships and regularly monitoring their evolution. By referencing to resources like The Global Slavery Index, ITUC Global Rights Index, UN publications, government advice, and media reports, we consider factors such as geography, industry sector, and operational considerations. We recognise the iterative nature of this process and continuously refine our approach based on ongoing learning and supplier relationships.

## Identifying geographic risk

Whilst the majority of our first-tier suppliers are based in Australia, we recognise that supply chains are complex and often involve a number of indirect inputs. With expansion activity underway in Malaysia and more generally across Asia, NEXTDC acknowledges the increased risks associated with human rights and the supply chain. This is primarily a concern in the construction industry, which is a major employer of migrant workers, and there have been reports of forced labour and passport confiscation in this sector. This is particularly relevant in jurisdictions where knowledge of modern slavery is limited and where regulation and enforcement are lacking. In these circumstances, NEXTDC is employing a higher standard and taking

active steps to identify and eliminate these risks. This includes working with several tier-one suppliers, such as construction service providers to understand how these risks are being identified and mitigated across the broader supply chain in tier two and three layers. These are being included at the selection and contract negotiation stage.

The process for supplier selection in Malaysia has involved physical interviews and site visits to specifically discuss modern slavery risks. As part of the tendering process, contractors and suppliers are required to formally acknowledge NEXTDC's human rights policy and supplier code of conduct and provide specific details on their own process prior to moving onto the next stage. Furthermore, NEXTDC intends to conduct regular assurance activities on these suppliers and contractors post the selection phase to ensure continued adherence to the expectations of the company.

Given our increased focus in Malaysia and across the broader Asia-Pacific region, NEXTDC engaged closely with relevant supply-chain partners to assess modern slavery risks and to strengthen awareness and understanding of these issues.

During FY25, a proposed tier-one supplier notified NEXTDC of an identified modern slavery incident involving one of its own suppliers, relating to the non-payment of wages to foreign workers. Upon becoming aware of the issue, the supplier initiated remediation actions for affected workers and commenced an immediate investigation. This investigation confirmed breaches of the supplier's own code of conduct and contractual obligations by the tier-two supplier. The tier-one supplier also provided immediate financial and non-financial support to impacted workers. While the tier-two supplier was not providing goods or services to NEXTDC, the matter was treated seriously, and NEXTDC undertook an independent review of the tier-one supplier's due diligence processes. The review, conducted by NEXTDC's Procurement and Risk and Compliance teams, found that the supplier's response and overall conduct were appropriate. The review also identified a number of improvements to strengthen aspects of the existing risk framework. These improvements were acknowledged by the supplier and agreed to be implemented, with NEXTDC continuing to monitor progress against these actions.

We have focused on our high-risk suppliers to not only understand where their own businesses are located but also where they are sourcing their goods and services from. The countries that are most relevant to our business include Australia, New Zealand, Germany, Italy, Switzerland, China, United Arab Emirates, United Kingdom, Turkey, Malaysia, South Korea, and Philippines, where a large proportion of the goods and services we procure originates from. We are committed to working with the key suppliers with whom we have the largest influence due to the spend profile. We recognise the importance of our suppliers implementing appropriate controls, processes, and policies to mitigate modern slavery risks in countries where modern slavery is more prevalent. We continue to monitor and manage this as part of our supplier due diligence process and hold them accountable for complying with NEXTDC's Supplier Code of Conduct.

# Risks by Categories and Sector



## Data centre parts and consumables

Goods may be manufactured and sourced from countries with elevated risks of Modern Slavery.



## Construction

Multi-tiered supply chain layers which can involve labour from countries that are poorly regulated particularly in relation to raw materials. Use of low skilled low paid construction workers in the design and construction of new data centres and the upgrading of existing data centres.



## Computing and electronic equipment

Typically manufactured from countries that are considered higher risk for Modern Slavery due to poor regulation and limited protections for workers. Such items may include computers, mobile phones, and audio-visual equipment.



## Professional services

Services may be provided by companies engaging in long-term subcontracting and the use of labour sourced from overseas locations, where Modern Slavery is prevalent due to poor regulation.



## Critical plant equipment

Manufacturing of subcomponents for the directly procured equipment (via tier 2 and 3 suppliers) may be sourced from locations with elevated risks of Modern Slavery.



## Facility maintenance

Modern Slavery risks exist with particular categories such as cleaning, where workers are typically low-skilled, low-paid and belong to a transient workforce that is sometimes subjected to inappropriate labour hire and subcontracting practices.

# Due Diligence

Our Procurement team conducts a range of supplier due diligence assessments at various stages of our sourcing and procurement process. NEXTDC's due diligence and remediation activities are performed in line with the United Nations Guiding Principles. We are focused on identifying, assessing, preventing, and mitigating human rights risks with a priority on our highest-risk direct suppliers on a periodic basis.

## Prevention and mitigation

We employ an interactive process to assess human risks in our supply chain for both new and existing suppliers. This ensures that our approach remains relevant and identifies changes where we may directly or indirectly cause or contribute to instances of Modern Slavery. We remain committed to expanding our knowledge and transparency of those risks and taking appropriate action to eliminate these, including targeting those suppliers that are of most concern.

## Supplier onboarding

Our supplier vetting process includes a risk assessment as a key criterion in the vendor approval process. Where appropriate, potential suppliers must provide additional information to address our concerns on human rights and modern slavery risk. This includes the completion of an assessment to articulate how those risks are mitigated and managed by their organisation. In addition, all suppliers are required to acknowledge NEXTDC's Supplier Code of Conduct, which outlines our commitments in this area and our expectations of their conduct in maintaining human rights standards, including the elimination of child, bonded, forced, or involuntary labour in accordance with international and domestic best practice. Where a potential supplier cannot demonstrate their compliance with these requirements, they will not be permitted to conduct trade with us.

## Renewing supplier agreements

Where a supplier is seeking to renew their contract, NEXTDC's Procurement and Legal teams will review and determine whether further assessments on Modern Slavery compliance are required before new

agreements are finalised. This is a step that has been introduced to provide a safety net for long-standing suppliers and to ensure our suppliers' human rights compliance posture is foremost in the relationship.

## Desktop supplier assessments

NEXTDC continued its annual supplier desktop assessment to identify and manage modern slavery risks throughout FY25. The assessment primarily focussed on our first-tier, high-risk suppliers and where appropriate sought information on second-tier suppliers. This assessment process is designed to provide NEXTDC with further insights into our supply chain by reviewing industry-specific data, supplier policies, processes, and the control framework in place to manage modern slavery.

In FY25, we conducted a total of 42 supplier assessments, and 12 of those were considered high-risk suppliers when considering the scope and the geographical locations. Whilst no instances of modern slavery were identified, we are continuing to closely monitor six potentially high-risk suppliers. Consistent with trends in previous years, an increasing number of suppliers have indicated a level of maturity in their own systems to detect and eradicate modern slavery and human rights risks. Pleasingly, this is the case for several vendors who do not have an obligation to publish their own modern slavery statement, which indicates a broad commitment beyond their own regulatory requirements. Where it is evident that a supplier is not demonstrating progress in this respect, NEXTDC proactively supports and educates these vendors to improve their systems and processes. The additional layers support the approach taken by NEXTDC and signify a shared commitment to permanently eradicating modern slavery in the broader supplier chain.

## Physical supplier assessments

Throughout the procurement and sourcing process, NEXTDC is often required to visit suppliers' premises for a variety of reasons. This includes factory acceptance testing of key equipment or components at both their Australian and international locations. Where it is appropriate, we have committed to a

process under which a modern slavery assessment is undertaken as part of supplier visits.

During FY25, the Procurement and Risk and Compliance teams conducted several in-person visits, including for assessing potential suppliers within the Asian region. We believe that this is an essential part of the due diligence process, particularly where modern slavery risks are considered higher than in other jurisdictions. In particular, the supply chain audit process was conducted in both Australia and Malaysia, noting the different risk environments in each country. As a result, NEXTDC has provided feedback to the audited suppliers around opportunities to strengthen their approach to eliminating modern slavery risks from their own supply chains and has continued to advocate for long-lasting meaningful change. These efforts will continue in FY26 as the business continues its expansion activities both in Australia and across the Asia Pacific area.

## Supplier contracts

Demonstrating our clear commitment to eliminating human rights risks in our supply chain is also evident in our contracting process. In FY25, a large majority of supplier agreements included positive obligations on modern slavery and transparency in supply chains. The modern slavery provisions also require suppliers to notify NEXTDC if they become aware of an instance of modern slavery in their supply chain and provide information to NEXTDC to allow it to conduct its own assessment in relation to the suppliers response and ongoing suitability to trade with the company.

In keeping with NEXTDC's approach to modern slavery, a breach of these modern slavery provisions may result in us terminating the contractual arrangement with those suppliers. We are continuing to incorporate modern slavery provisions into our ongoing contracts where relevant and we continue to ensure that our employees understand the importance of this control in our contracting process. It is important that new suppliers understand and appreciate these expectations and where appropriate we are also discussing this before entering into new contracts. To further enhance awareness and knowledge of modern slavery, we also take the opportunity to consult with our suppliers at regular cadence sessions.

## Training and awareness

NEXTDC continues to raise awareness of modern slavery in its organisation by educating our employees and providing a variety of awareness sessions. We are committed to continuing to build our teams' knowledge and capabilities in this regard. We consider our employees as a key factor in identifying and addressing the risks of modern slavery. Our training program aims to equip them with the knowledge, tools, and skills to understand and describe modern slavery, how to identify it and how to report suspected incidents.

During FY25, 97.3% of NEXTDC staff had completed one or more of these training sessions. In FY26, we plan to progress our personalised, on-site training program for our Malaysian contractors and project team members. Building on the groundwork laid in prior years, this initiative will focus on strengthening understanding of ethical business practices, including modern slavery and human rights. We continue to recognise that in-person training is particularly valuable for supporting foreign workers, as it enables deeper engagement, better appreciation of cultural nuances, and stronger working relationships. The program will be delivered in a tailored format that reflects the needs and skill levels of participants.

## Audit

We remain committed to completing in-person audits to identify supplier risks, including those related to modern slavery and human rights, using our supplier internal audit framework that we established in 2023. Besides assessing compliance with our Supplier Code of Conduct and human rights program, we require our suppliers to disclose policies relating to ethics, compliance with the law, labour rights, and working conditions. These audits complement the desktop assessment process and will provide further assurance on modern slavery risks for our tier-1 suppliers. In FY26, we will continue to audit our tier-1 and tier 2 suppliers and contractors based on the relevant risk profiles, noting that our focus on human rights continues to increase as the business expands across Asia.

## Remediation

NEXTDC is committed to remediating any identified instances of human rights and modern slavery abuses in our operations and supply chain. We have provided several mechanisms for employees, contractors, and third parties to raise grievances, including raising any actual or suspected breaches. Policies and procedures such as our Grievance Handling Procedure, our Equal Opportunity Policy, and a variety of policies covering discrimination, harassment, workplace bullying issues as well as our Whistleblower Policy provide a framework within which our teams can raise concerns and grievances and ensure they are managed fairly and impartially. We also encourage team members to talk with the modern slavery committee members, their leaders, or People and Culture representatives about any actual or suspected breaches in a confidential manner. In the construction space, we extend this expectation to site-based personnel and subcontractor workers, encouraging them to raise any concerns or observations directly through our established grievance channels or via their site supervisors.

Where non-conformances or risks of modern slavery are identified, NEXTDC will partner with the supplier to formulate and execute a corrective action plan and agree on a timeline for its implementation.

**No modern slavery-related complaints were received or actioned by NEXTDC during FY25.**

## Assessing Effectiveness

NEXTDC's modern slavery framework represents an ongoing journey we will continue to mature in keeping pace with our growth while staying aligned with the UNGP. We measure the effectiveness of our actions through ongoing monitoring of vendor risk ratings, completion of corrective actions, training participation rates, and regular internal reviews of vendor management and onboarding processes. We will continue to build on the foundation we have established to evolve and assess our effectiveness in identifying and managing modern slavery risks within our operations and supply chain.

Our modern slavery committee, which was established in 2018, will continue to drive these initiatives by:

- Investigating complaints and grievances and reports of issues received through our mechanisms such as the [Whistleblower Policy](#)
- Annual reporting on human rights and modern slavery related matters to the Executive Management and the Audit and Risk Management Committee (ARMC) of the Board
- Supplier audits and other assurance activities
- Incorporating procurement and human rights risks into the scope of our internal audit program
- On-going assessments of compliance against our Supplier Code of Conduct
- Ensuring contract templates include the right clauses
- Continuous improvement initiatives
- Regular engagements and collaboration with the suppliers of goods and services
- On-going training and awareness sessions for internal and external stakeholders

## Looking Forward

As our business continues to grow in Australia and Asia, including expansion into new territories, so too does our supplier footprint. We remain committed to preventing and addressing modern slavery risks across our operations and supply chains.

In FY26, we will continue to focus on the following initiatives:

- **Training and Awareness:** We prioritise education and awareness programs for our teams and suppliers, particularly those operating in high-risk environments. We are exploring face-to-face training sessions to enhance engagement and effectiveness.
- **Supplier Audits and Assurance:** We continue to strengthen our supplier audit and assurance activities in line with contractual obligations, with a particular focus on suppliers in Asia.
- **Internal Assurance and Procurement Controls:** Our internal assurance programs around

## Consultation

NEXTDC's overarching policies, systems and processes have been prepared in collaboration with key functions including our procurement, operations, legal, risk and compliance teams. This collaborative approach ensures that our efforts to eliminate human rights violations and modern slavery risks are comprehensive and effective. Our Chief Executive Officer and Chief Risk Officer, who oversee our overall risk management framework, have reviewed this Statement. It has subsequently been approved by our Board of Directors.



procurement leverage our modern slavery framework. We are developing new tools to support these processes, including targeted supply chain audits focused on new and emerging markets.

▪ **Supplier Engagement and Risk Mitigation:** We maintain active engagement with suppliers to raise awareness, improve performance, and implement corrective actions. This includes using translators and expanding communication methods to ensure understanding across diverse markets.

▪ **Embedding Best Practice:** We integrate learnings and best practices across Australia and Asia. This

includes incorporating worker voice into assessments and collaborating with suppliers to extend our oversight into tier two supply chains.

▪ **Monitoring and Compliance:** Our internal audit and assurance programs measure the effectiveness of our control framework, ensuring compliance with company policies and alignment with industry best practices.

Through these efforts, we aim to continuously enhance our understanding of modern slavery risks and strengthen our capacity to address them as our business and supplier networks expand.

## Appendix A: Requirement Index

Table below outlines the sections of this Statement addressing NEXTDC's response to meet the core mandatory content required by the Modern Slavery Act 2018 (Cth).

No	Reporting criteria	Page
1	Section 16 (a) Identify the reporting entity.	5
2	Section 16 (b) Describe the reporting entities structure, operations and supply chains.	7
3	Section 16 (c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls.	9
4	Section 16 (d) Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address the risks, including due diligence and remediation processes.	10
5	Section 16 (e) Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks.	11
6	Section 16 (f) Describe the process of consultation with: (i) any entities that the reporting entity owns or controls.	11
7	(ii) in the case of a reporting entity covered by a statement under section 14—the entity giving the statement.	N/A
8	Section 16 (g) Include any other information that the reporting entity (or the entity giving the statement) considers relevant.	N/A





N E X T D C



All enquiries or feedback on this statement should be directed to NEXTDC's Procurement and Compliance team at [all.procurement@nextdc.com](mailto:all.procurement@nextdc.com)