

ANTI-BRIBERY AND CORRUPTION POLICY

NEXTDC Limited and its subsidiaries (ACN 143 582 521)



Purpose

NEXTDC is committed to conducting business transparently, honestly and with integrity. Therefore, it is important that the Company complies with and conducts its business in accordance with applicable anti-bribery and anti-corruption laws.

This policy outlines the responsibilities in observing and upholding the prohibition on bribery and related improper conduct and should be read in conjunction with the Company's Code of Conduct.

Scope and Responsibility

This policy is applicable to all directors, employees, temporary staff, contractors, suppliers, service providers, and other third parties acting for or on behalf of the NEXTDC Limited and its subsidiaries. Bribery and the related improper conduct referred to in this policy are serious criminal offences for both the company and any individuals involved.

Each one of the above-mentioned individuals has a personal responsibility and obligation to conduct NEXTDC's business activities ethically and in compliance with all applicable laws based on the countries in which NEXTDC does business. Failure to do so may result in disciplinary action, or resultant action under a relevant contract.

NEXTDC has developed a comprehensive program for implementing this Policy, through appropriate guidance, training, investigation and oversight. The Chief Legal Officer (CLO) has overall responsibility for the program, supported by the Board. The Risk and Compliance Manager together with the Chief People and Culture Officer (CPCO) are responsible for giving advice on the interpretation and application of this policy, supporting training and education, and responding to reported concerns.

Overview

NEXTDC strictly prohibits bribery or other improper payments in any of its business operations. This prohibition applies to all business activities, anywhere in the world, whether involving government officials or other commercial enterprises. A bribe or other improper payment to secure a business advantage is never acceptable and can expose individuals and NEXTDC to possible criminal prosecution, reputational harm or other serious consequences.

Improper payments prohibited by this policy include bribes, kickbacks, excessive gifts or entertainment, or any other payment made or offered to obtain an undue business advantage. These payments should not be confused with reasonable and limited expenditures for gifts, business entertainment and other legitimate activities directly related to the conduct of NEXTDC's business.

The Policy

NEXTDC personnel must:

- (a) read, understand and adhere to this policy and all related standards, guidelines and procedures;
- (b) not give, offer, accept or request bribes, facilitation payments, secret commissions or other prohibited payments or engage in money laundering or cause any of them to be given, offered, accepted or requested;
- (c) not approve any offers, or make, accept or request an irregular payment or other thing of value, to win business or influence a business decision in favour of NEXTDC;
- (d) comply with any reporting and approval processes for gifts, entertainment or hospitality;
- (e) not offer or receive any gifts, entertainment or hospitality to or from public or government officials or politicians, without approval from the relevant CXO members for your business;
- (f) obtain required approvals for donations and sponsorship;
- (g) maintain accurate records of dealings with third parties; and
- (h) be vigilant and report any breaches of, or suspicious behaviour related to, this policy.

Review

This Policy will be reviewed at least annually by NEXTDC Senior Executive Management and presented to the Board for approval. Any questions should be directed to: fraud@nextdc.com