



NEXTDC Limited ACN 143 582 521 and its subsidiaries (the “Company”)

RISK MANAGEMENT POLICY

1. Purpose

NEXTDC is committed to having a sound risk management framework and recognises it is not only an important component of good corporate governance, but is also fundamental in achieving strategic and operational objectives and meeting legislative, industry and client obligations. It improves decision making by identifying potential exposure to economic, environmental and social sustainability risks and mitigates material events that may impact shareholder value.

2. Methodology

NEXTDC has implemented a risk management framework consistent with the international risk standard ISO31000 which ensures a systematic approach is used to identify and assess risks, and determine treatment plans to manage, transfer and avoid risks. NEXTDC’s Risk Management Framework promotes awareness of risks throughout the organisation and an understanding of the company’s risk appetite.

NEXTDC commits to continuous improvement in governance and the implementation of best practice. The performance of the risk management framework shall be measured by assessing risk maturity rating.

3. Responsibilities

The Board is ultimately responsible for identifying and assessing the nature and extent of internal and external risks that may impact NEXTDC in achieving its strategic objectives. The Board is responsible for setting the risk appetite and overseeing the development and implementation of the Risk Management Framework to satisfy itself that the framework is sound.

Management is responsible for ensuring risks are identified, analysed, evaluated and mitigated and champion the implementation of risk management processes within their areas of responsibility.

This policy applies to all staff at NEXTDC. Risk management processes shall be applied to all design and construct projects, engineering, service delivery, information security management and the ongoing management of the facilities. NEXTDC commits to making the necessary resources available to assist those accountable and responsible for managing risks.

4. Reporting

In accordance with the ASX Corporate Governance Principles and Recommendations (3rd Edition) and the Corporations Act, the CEO and the CFO provide a declaration to the Board which will state that their opinion has been formed on the basis of a sound system of risk management and internal control which is operating effectively.

5. Policy Review

The Board is responsible for reviewing and approving the Risk Management Framework at least annually to ensure its effectiveness and continued application and relevance to NEXTDC.

Adopted by the Board of Directors on the 25th day of August 2015