

HUMAN RIGHTS POLICY

NEXTDC Limited and its subsidiaries (ACN 143 582 521)



NEXTDC respects the rights and interests of the communities in which we operate, those who may be impacted by our activities and those within our supply chains. We conduct business in a manner consistent with the United Nations' Guiding Principles (UNGP) on Business and Human Rights.

This policy applies to all NEXTDC employees in respect of all contractors/suppliers engaged directly or indirectly by the company, visitors, and other personnel present on NEXTDC work sites, using its facilities, or dealing with its employees or contractors. We are committed to ensuring that our supply chain uphold these principles and urge them to adopt similar policies within their own businesses. Our Human Rights Policy is overseen by NEXTDC's Board of Directors, including the Chief Executive Officer.

Our Commitment

NEXTDC's approach and respect to human rights is underpinned by our values and strategic objectives to uphold the commitments we make to our stakeholders. We have implemented fundamental human rights across our operations and projects by conducting ourselves and our business with humanity and due care, while staying compliant with relevant laws and regulations. We care about our impact on our stakeholders including colleagues, suppliers, customers and the community we live in. We will:

- respect the diverse cultures and heritages of our stakeholders including local communities;
- recognise the rights of Indigenous peoples, acknowledging their connections to lands and waters and respecting their culture;
- consult with stakeholders on human rights issues and provide an easily accessible complaints mechanism to resolve grievances in a timely manner;
- respect that all employees have a right to reasonable work conditions and remuneration;
- not use forced, compulsory or child labour in our operation and not tolerate such behaviours in our supply chain;
- not tolerate harassment or adverse discrimination;
- require that all personnel receive appropriate human rights and cultural training and guidance; and
- communicate this Policy and our commitment to human rights to all stakeholders.

This includes our commitment to work including with our contractors and suppliers to ensure that there is no modern slavery in our operations and supply chain and demonstrating continuous improvement in this regard through our annual reporting obligation under the Modern Slavery Act 2018 (Cth).

Reporting & Risk Management

As part of our reporting obligation under the Modern Slavery Act, NEXTDC takes a risk-based approach in maintaining a due-diligence program with our supply chain that includes reviews on human rights management. Compliance with our human rights requirements is included as part of our supplier onboarding and the ongoing management review process. Human rights risks are managed in accordance with NEXTDC's Risk Management Policy with established accountabilities, risk oversight, management, and internal control systems. Suspected or actual breaches of this Policy should be reported in line with NEXTDC's Whistleblower Policy available on our website. Where instances of Human Rights issues are identified, we will seek to address, rectify, and eliminate these in accordance with relevant legislation and the UNGP guideline.

This Policy is in line with NEXTDC's Procurement Framework and the underlying policies such as the Supplier Code of Conduct, Supplier Onboarding, and ongoing management review process.