

SUPPLIER CODE OF CONDUCT

NEXTDC Limited and its subsidiaries (ACN 143 582 521)






Introduction

NEXTDC is committed in ensuring its supplier management and procurement practices are transparent, fair and responsible, aligned with the Company's Values. As an extension to our core Values, NEXTDC seeks to engage with suppliers who share these values and adhere to the minimum requirements outlined in this Code of Conduct ('Code').

NEXTDC takes care in selecting its third-party suppliers and contractors of goods and services, and expects them to read, understand and ensure that their business and supply chain meet the requirements of this Code; and communicate the same to related entities, suppliers and subcontractors who support them in supplying to NEXTDC.

Our corporate Values

At NEXTDC, our corporate Values and strong focus on ethics and compliance, are the behaviours and commitments that are expected from every individual in the Company and those supporting us externally, including our suppliers and their supply chain. These values remain as the six most important attributes by which we will recognise, reward, hire, fire and promote our people. NEXTDC's defined corporate values are as follows:

					
CUSTOMER FIRST	ONE TEAM	BRIGHT IDEAS	PURSUIT OF EXCELLENCE	STRAIGHT TALK	FRUGAL NOT CHEAP
We are obsessed with delivering the world's best customer-experience.	We are an elite team, working together with super stars playing in every position.	The best way to predict the future is to create it.	We are relentless in our pursuit of excellence, not perfection.	We don't talk bull, we have crucial conversations, we disagree and then we commit.	We spend our money where it matters the most.

Principles

While our suppliers are independent entities, their business practices and actions may impact upon our reputation. For this reason, our suppliers are expected to work to the following ethical, social and environmental standards of conduct. NEXTDC favours suppliers who can demonstrate having established a strong governance in each of the pillars below.

Corporate governance and ethical practices

- Operate ethically, with integrity and cultural sensitivity while employing clear standards of corporate governance;

- comply with all relevant laws and regulations in relation to bribery, corruption and other prohibited practices; and
- be accountable and transparent in their operations and provide an avenue for anyone to express concerns relating to any improper conduct without fear of reprisal.

Suppliers should also familiarise themselves with the NEXTDC's Whistleblower Policy and Anti-bribery and Corruption Policy (available at www.nextdc.com) which outlines what to do if they have any genuine concerns regarding improper conduct in their relationship and dealings with NEXTDC.

Workplace, health and safety

- Provide and maintain a safe and healthy working environment for all workers and visitors;
- comply with all relevant laws and regulations in relation to work, health and safety; and
- comply with reasonable directions from NEXTDC in relation to work, health and safety.

Workplace Health and Safety, intended as the provision of a safe, healthy and secure work environment to our employees, contractors and visitors is of paramount importance to NEXTDC as outlined in its WHS Policy available in our website at www.nextdc.com.

Environmental, social and governance risk management

- Proactively identify the actual and potential social, environmental and economic impacts of their decisions and activities, with the aim of avoiding and mitigating negative impacts;
- comply with all relevant environmental laws and regulations;
- have systems in place to manage and monitor environmental risks and performance; and
- have business continuity plans in place that are maintained and tested regularly.

Information security and privacy management

We expect our suppliers to work with us to protect our data and networks by implementing industry best practice or standard technical and organisational security measures, including managing and monitoring their supply chain to protect NEXTDC data and networks from breaches. Suppliers must:

- treat NEXTDC data they have access to as confidential information and only use that data for the purpose of services provided to NEXTDC;
- notify NEXTDC on any data or network breach immediately;
- have appropriate information security policies and procedure in place to protect any NEXTDC information they may have access to; and
- adhere to and follow any policies or directions given to them by NEXTDC or its representatives to ensure NEXTDC's continual compliance to its own information security certification program.

NEXTDC's **Privacy Policy** (available in our website at www.nextdc.com.) outlines our privacy commitment and explains how we collect, use, disclose and protect personal information. Privacy is a non-negotiable part of how we work, and our suppliers must apply adequate data privacy and security protection to protect the personal information of our employees, customers and other stakeholders from unauthorised access, use and disclosure. Suppliers who collect, use, store or have access to this personal information must have adequate processes and procedures in place to monitor compliance with applicable privacy laws and contractual privacy obligations with NEXTDC. This includes suppliers not doing anything which would cause NEXTDC to be perceived as acting inconsistently with our Privacy Policy.

Labour policies and human rights

- Respect fundamental human rights and the dignity of people by ensuring equal opportunity, equality and diversity irrespective of race, ethnic or national origins, gender, sexuality, disability, marital status and religious belief;
- suppliers must comply with all relevant, local and national laws and regulations with regards to employment practices, benefits, health and safety and anti-discrimination;
- suppliers must have written workplace management policies and standards inclusive of equal opportunity, anti-discrimination and anti-harassment, bullying principles and employee grievance resolution;
- employment is freely chosen and there is no forced, bonded or involuntary labour; and
- must not use any form of child, forced or involuntary labour and abide with all international standards and domestic regulations relating to the employment of children.

Supply chain

NEXTDC aims to collaborate with its suppliers to minimise adverse social, economic and environmental effects of activities occurring along its supply chain. We will work with our suppliers to ensure they follow our sustainable practices as outlined in this Supplier Code of Conduct to meet our expectation and the community. At a minimum, suppliers are expected to adopt similar principles to those outlined in this Code of Conduct when dealing with their own critical suppliers.

Assessment and review

NEXTDC will work closely with its suppliers to ensure that they are aligned to this Code. NEXTDC may carry out regular assessments of the practices of its suppliers, including self-assessment by suppliers of their operations, periodical request of supporting documentations and site visits to carry out in-depth reviews. Our objective is to work with our suppliers to identify best practice and support improvement where required. We expect that suppliers to the NEXTDC will respond to these requests to their best ability, by providing open, honest and complete information.