



NEXTDC  
where the cloud lives™

# FY22 MODERN SLAVERY STATEMENT



# CONTENTS

A Letter from the CEO and Chairman	4
FY22 Highlights	5
About NEXTDC	6
Our Corporate Values	7
Corporate Governance	8
Modern Slavery Framework	10
Modern Slavery Risks	11
Due Diligence	12
Assessing Effectiveness	13
Consultation	14
Looking Forward	14
Appendix A: Requirement Index	15

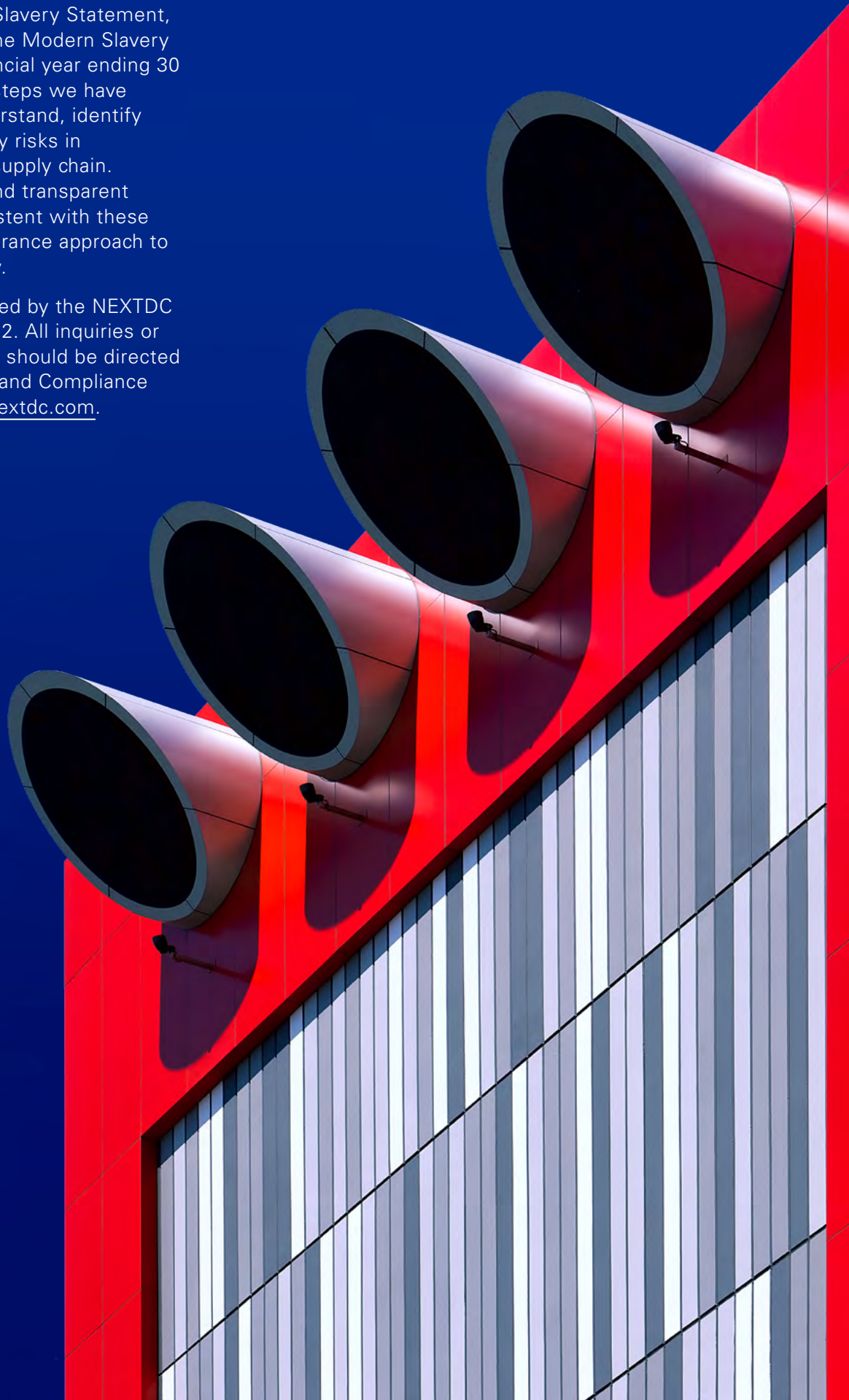




# FOREWORD

This is NEXTDC's Modern Slavery Statement, made in accordance with the Modern Slavery Act 2018 (Cth), for the financial year ending 30 June 2022. It outlines the steps we have taken in continuing to understand, identify and address modern slavery risks in NEXTDC's operations and supply chain. NEXTDC requires ethical and transparent labour practices and, consistent with these principles, takes a zero-tolerance approach to any form of modern slavery.

This statement was approved by the NEXTDC Board on 16 December 2022. 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).



# A LETTER FROM THE CHAIRMAN AND CEO

NEXTDC continues to recognise modern slavery as a global issue that calls for greater transparency, human rights-related reporting requirements, and business accountability. Our governance framework reflects the highest levels of integrity and ethical standards, including our commitment to human rights and compliance with the Modern Slavery Act.

NEXTDC has continued to conduct its business in a manner consistent with the practices outlined in the United Nations Guiding Principles on Business and Human Rights (UNGP Principles). Our Human Rights Policy acts as the overarching assurance mechanism to ensure our compliance.

Throughout FY22, we have continued to evolve our maturity framework to identify and address modern slavery risk. We value the rights of our people and the communities we operate in, our business partners, our employees, and those working within our supply chain. We are committed to addressing instances of human rights wherever we encounter these and have established a robust approach to manage and eliminate modern slavery risks in our corporate activities, and our supply chains.

While we have not identified any specific instances of modern slavery risk in FY22, we have continued to apply our robust methodology to review areas in our operations and supply chain where risk factors of modern slavery may exist. We have continued to embed modern slavery awareness and track our progress against key performance indicators. While we acknowledge that this is necessarily an ongoing program of work, we are pleased with the progress we have made in this reporting period and have set ambitious goals for the next reporting period.

Upholding the UNGP Principles and protecting the human rights of those we employ, and work with will remain a key priority, a moral obligation, and central to who NEXTDC seeks to be as a provider of first-class services. As an organisation, we will continue to innovate and invest in ways that further improve our framework in meeting the increasing customer, community, and regulatory expectations in the area.



**DOUGLAS FLYNN** CHAIRMAN



**CRAIG SCROGGIE** CEO

# FY22 HIGHLIGHTS

Published our second Modern Slavery Statement in October 2021, in line with the requirements of Modern Slavery Act 2018 (Cth).

Modern Slavery Committee continued to spearhead our efforts and coordinate due diligence activities on modern slavery risk across our operations and supply chains.

Conducted modern slavery risk assessments across suppliers, deep diving into high-risk tier-one suppliers.

Developed a customised Supplier Audit Tool to support our supply chain assurance program.

Continued to deliver modern slavery training to all employees to build greater awareness of human rights and modern slavery risks and issues.

Discussed Modern Slavery expectations with key suppliers during periodical reviews.



# ABOUT NEXTDC

## Who we are and what we do

NEXTDC Limited is a publicly listed technology company on the Australian Securities Exchange (ASX) focussed on the supply of premium enterprise-grade data centre services, connectivity solutions, and infrastructure management software. The Company has twelve operational data centres, across Australia in Brisbane, Canberra, Melbourne, Perth, Sydney and the newly acquired international sub-sea cable landing station on the Sunshine Coast. NEXTDC entered the ASX 100 in June 2020. Further details on the Company's activities, products and services, types of customers, net sales, capital, and quantity of services are available in NEXTDC's FY22 Annual Report located in the financial section of the company 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-caliber employees, and builds and enhances our customer relationships.

Our Board of Directors drives culture and accountability. They ensure our values are reflected in the Company's operations and our day-to-day activities, our values also underpin our approach to modern slavery and human rights issues, be it in our commitment to the community we work in, our supply chain and partnerships, or our employees. We care about our impact on stakeholders including colleagues, suppliers, customers, and the community we live in. We are committed to:

- respecting the diverse cultures and heritages of our stakeholders including local communities
- recognising the rights of indigenous peoples, acknowledging their connections to lands and waters and respecting their culture
- consulting with stakeholders on human rights issues and providing an accessible complaints mechanism to resolve grievances in a timely manner
- respecting 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 of any kind
- 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 our stakeholders.

“

NEXTDC recognises that modern slavery is a significant global issue that presents moral and ethical challenges for businesses. In line with our Values, we are committed to continually improving our framework to combat modern slavery within our supply chains with a zero-tolerance approach and act with integrity in all our business arrangements.

”

### Craig Scroggie

CHIEF EXECUTIVE OFFICER,  
NEXTDC





### **CUSTOMER FIRST**

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



### **ONE TEAM**

We are an elite team working together with super stars 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

## **OUR CORPORATE VALUES**



# CORPORATE GOVERNANCE

At NEXTDC, corporate governance refers to the reporting processes we use to ensure our business is compliant. It is a combination of processes, audits, and activities to enable the Board to scrutinise and manage NEXTDC's activities. NEXTDC has a Corporate Governance Framework that continues to evolve as it seeks continual improvement in the way it manages its business.

NEXTDC engages with many product and service providers, especially in connection with the design, build, operation, and maintenance of our facilities. All suppliers are required to comply with the Supplier Code of Conduct (the 'Supplier Code'). That includes complying with our Human Rights Policy and modern slavery requirements. In awarding contracts, NEXTDC prioritises suppliers that demonstrate best practices that are verified as part of the selection process. Following the appointment, NEXTDC's supplier assurance process is in place to verify that the Code is adhered to at all times. This process is further explained below.

NEXTDC is committed to operating in a socially responsible and ethical manner. NEXTDC aims to meet the highest standards of integrity in a clear and transparent manner. These are standards beyond our legislative requirements and reflect the values we detail in this document. Our approach to corporate governance is further detailed in our FY22 Corporate Governance Statement, available on our website at [www.nextdc.com](http://www.nextdc.com).

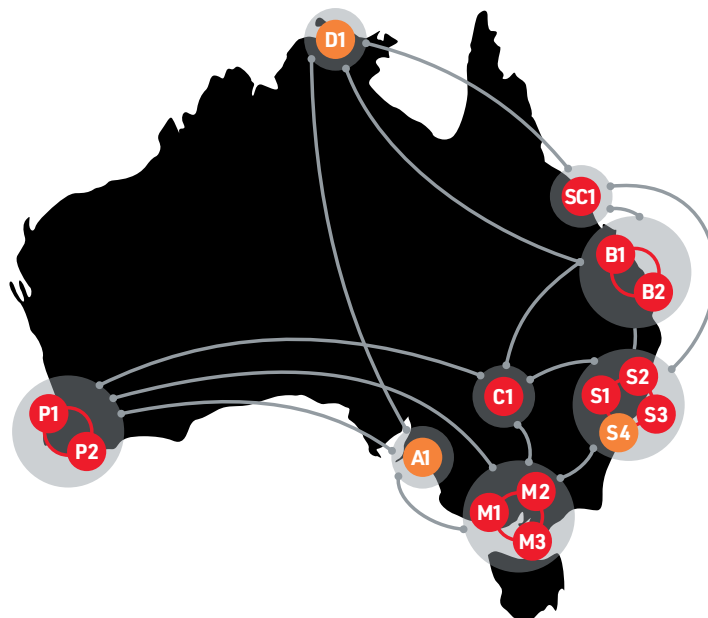




## OUR STRUCTURE, BUSINESS OPERATIONS AND SUPPLY CHAIN

### Where do we operate?

Headquartered in Brisbane, NEXTDC has twelve live and operational data centres across Australia, located in Brisbane, Sunshine Coast, Melbourne, Sydney, Perth, and Canberra. NEXTDC also has offices in Singapore and Japan.



### Our supply chain

In FY22 we transacted with 636 first tier (direct) suppliers for a total of over \$630 million.

98% of those suppliers were incorporated and located in Australia.

93% of our annual spend in FY22 was consolidated amongst top 50 first tier suppliers.

90% of our suppliers are located in Australia.

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 FY22, more than 98% of the 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 who were based in Hong Kong, Canada, Germany, Indonesia, United Arab Emirates, Ireland, Japan, Netherlands, Singapore, United Kingdom and the United States.

### COVID-19

NEXTDC has remained acutely aware of the impact of the COVID-19 pandemic and its impact on the global supply chain. Modern Slavery risks have increased due to high demand, a shortage of materials, and extended lead times.

We have continued to ensure that our actions have not contributed towards any exploitive practices.

During the third year of the pandemic, NEXTDC has sought to minimise its reliance on overseas suppliers and source goods locally where possible. An example of this would be the supply of Personal Protective Equipment (PPE) such as face masks and hand sanitiser which become more readily available during FY22. The business recognises that we have a responsibility to not only manage our risks but to take a leadership role and positively influence its stakeholders at every opportunity, which we have continued to do.

In FY22, we continued employee programmes to meet the needs of remote working during COVID-19. Our 'The Way We Work' strategy provides ongoing flexible working options to our team, recognising there is no one-size-fits-all solution to the way we work. This helped us continually adapt our strategy, proactively meet everyone's needs and support their ongoing health and wellbeing.

# 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 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 third-generation data centres. 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. 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 applies to all NEXTDC employees, its contractors, and suppliers. This includes personnel present on NEXTDC work sites, using its facilities, or dealing with its employees or contractors. The Policy has been developed in a manner that is consistent with the United Nations' Guiding Principles on Business and Human Rights. It encapsulates the principle that NEXTDC will not tolerate slavery, forced, compulsory or child labour in our supply chain or business operations and confirms its commitment to maintaining a due diligence program to prevent, identify, mitigate and eliminate any breaches in this regard. We are also committed to ensuring that our supply chain participants uphold these principles, and we encourage 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.

### 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. The Supplier Code of Conduct reserves NEXTDC the right to audit suppliers and their operations. If a supplier fails to act consistently with the Supplier Code of Conduct or specific contractual obligations, this may result in remedial action or termination of their contract. At a minimum, we review our Supplier Code of Conduct annually to maintain its relevance and ensure it appropriately captures any human rights values that we hold. We have also taken the opportunity to regularly discuss this with suppliers with a particular focus on human rights to ensure that this message is received and understood by our broader supply chain.

### Whistleblower Policy

NEXTDC's Whistleblowers Policy enables employees, contractors, and suppliers to anonymously report suspected misconduct. The Policy and associated procedures have been designed to make it easy for employees to make disclosures without fear of retaliation. This includes matters relating to modern slavery, our labour practices, and human rights. NEXTDC is committed to promoting a culture of corporate compliance and ethical behaviour to create an environment in which employees or contractors, who have genuine suspicions about improper conduct, feel safe to report without fear of reprisal. The Head of People and Culture has been appointed as the Whistleblower Protection Officer to ensure that reporters are not personally disadvantaged as a consequence of making a report. The Board's Audit and Risk Management Committee (ARMC) Chair is an independent escalation/reporting point to whom a report can also be made if other avenues are not possible or preferred. Reports can be lodged via a dedicated email ([whistleblower@nextdc.com](mailto:whistleblower@nextdc.com)) of which the ARMC Chair is the only recipient. The Board is informed of any material incidents reported under the Policy, which includes matters related to human rights and modern slavery. All allegations received are reviewed and appropriately investigated as per the policy. Corrective or disciplinary actions are taken immediately, where required, including identifying improvements or learning opportunities.



# MODERN SLAVERY RISKS

## Our Risk Management Framework

NEXTDC acknowledges that risk is inherent in all aspects of its business operation and being able to effectively recognise and manage risks and opportunities is critical for success and the growth of the Company. NEXTDC is committed to managing risk within the risk appetite set by the Board NEXTDC’s Risk Management Framework which has been established based on the ISO31000 standard is reviewed and endorsed by the Board annually. Please refer to our Risk Management Policy, FY22 Environmental Sustainability, and Governance Report, and the FY22 Corporate Governance Report available under the Corporate Governance section of our website ([www.nextdc.com](http://www.nextdc.com)) for further details on NEXTDC’s Risk Management Framework and its implementation.

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

Our largest human rights risks are associated with the supply of goods for the construction and operation of our data centres. Whilst we are primarily focused on our direct suppliers, we recognise that there is also a vulnerability in our indirect supply chain. Because of this, we actively engage with our direct suppliers and thoroughly scrutinise their management systems. We proactively seek to increase the level of visibility on the origin of goods and services before these are delivered to NEXTDC.

We have continued to focus on our high-risk suppliers during FY22 and perform detailed due diligence to identify risk gaps and opportunities for improvement. We are committed to increasing our knowledge and awareness of modern slavery risks in these relationships and regularly monitoring their evolution. This includes continuing to reference resources such as The Global Slavery Index (Walk Free Foundation), ITUC Global Rights Index (International Trade Union Confederation), United Nations publications, government advice, and media reports. We also consider external factors such as geography, industry sector, and operational circumstances. Considerations recognising that these are iterative processes that require regular review enhanced by our learnings and relationships with these providers.

## 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. 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 which 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

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



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 Construct of new data centres and the upgrading of existing data centre

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.



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 Construct of new data centres and the upgrading of existing data centre.

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.



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 which are of most concern.

### Supplier Onboarding

Our supplier vetting process includes human rights risk assessment as a key criterion in the vendor approval process. Where appropriate, potential suppliers are required to 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 is not able to 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 team 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 and 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 FY22. The assessment focussed on our first-tier, high-risk suppliers and where appropriate sought information on second-tier suppliers. This assessment process was 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.

We conducted a total of 35 desktop assessments in FY22 as part of our due diligence process. This included 20 suppliers that were considered to be in the high-risk category. The assessment process captured 75% of our annual contestable spend. Whilst no instances of modern slavery were identified, we are continuing to closely monitor five potentially high-risk suppliers for additional due diligence. Consistent with observations in the previous years, the large majority of our key suppliers have demonstrated continued maturity in the development of their own systems and processes for managing modern slavery and human rights-associated risks. The additional layers support the approach taken by NEXTDC and signify a shared commitment to permanently eradicating modern slavery in the broader supplier chain. As part of the process, NEXTDC also identified a small number of suppliers which have not made significant progress since FY21. During FY23 and beyond, we will educate and support these vendors to strengthen their own internal controls before considering alternative options.

### Physical Supplier Assessments

Throughout the procurement and sourcing process, NEXTDC is often required to visit suppliers' premises for a variety of reasons. This included 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. As with the previous year, these assessments were not however conducted in FY22 due to the travel restrictions posed by the COVID-19 pandemic. We remain committed to recommencing these activities as part of future site visits and believe the process adds tangible value to the due diligence process as part of our broader supply chain assurance programme.

“

NEXTDC believes that all of our suppliers have an essential role to play in eradicating Modern Slavery and promoting Human Rights. It is important that as a company we only continue to work with suppliers who share the same values. We remain committed to understanding how the supply chain addresses these risks and will continue to educate them on our expectations throughout the due diligence process and beyond.



**Ben Werleman**  
HEAD OF PROCUREMENT

”



## Supplier contracts

Demonstrating our clear commitment to eliminating human rights risks in our supply chain is also evident in our contracting process. In FY22, we have progressively included modern slavery provisions within our supplier precedent agreements, including our standard purchase order terms and conditions, to impose obligations on our suppliers to seek to ensure that the suppliers act to reasonably control modern slavery risks in their supply chain. 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 keeping with NEXTDC's approach to modern slavery, a breach of these modern slavery provisions may result in us terminating the contractual arrangement. We are continuing to incorporate modern slavery provisions into our ongoing contracts where relevant and we continue to ensure that our staff understands 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.

## Training and awareness

NEXTDC continues to raise awareness of modern slavery in its organisation by educating our staff and providing a variety of awareness sessions. We are committed to continuing to build our teams' knowledge and capabilities in this regard. We regard our employees as the key mechanism 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 what modern slavery is, how to identify it and how to report suspected incidents.

Importantly, we have seen a significant improvement in the number of staff who have completed modern slavery awareness training. During FY22, at least 98% of our workforce had completed one or more of these training sessions, whilst further refresher courses are being undertaken during FY23. The Modern Slavery Risk Committee is continuing to identify opportunities for this training program to be expanded to potentially include selected suppliers during FY23.

## Audit

Modern slavery was included in NEXTDC's FY22 internal audit plan as part of assurance on its procurement process. No exceptions were noted in the areas of modern slavery.

NEXTDC has been working with its external assurance provider to develop an internal audit program for supplier audits. The Audits will commence in January 2023. Besides assessing compliance with our Supplier Code of Conduct and human rights program, we will require our suppliers to disclose policies relating to ethics, compliance with the law, labor rights, and working conditions. These audits will complement the desktop assessment process and are expected to provide further assurance on risks associated with Modern Slavery.

NEXTDC was also assessed by ISS Corporate Solutions for its human rights practices. We received the highest possible score of one, which indicates a higher quality governance practice and low governance risk.

## 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 a number of 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 to raise concern 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.

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 in FY22.

## 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 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
- ✔ 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

# CONSULTATION

NEXTDC's overarching policies, systems and processes have been prepared in consultation with the various functions in our business including our procurement, operations, legal, risk and compliance teams in a collaboration that seeks meaningful progress in the elimination in human rights violations and modern slavery risk. This Statement was reviewed by NEXTDC's Chief Executive Officer and the Chief Legal Officer who are responsible for the overarching risk management in this area and approved by NEXTDC's Board of Directors.



## LOOKING FORWARD

Over the next year, NEXTDC will progress the work streams we have established, in continuing to embed our Human Rights Policy across the business and our supply chain. We will continue to build our understanding, oversight and management of modern slavery risks in our operations and supply chains. NEXTDC will continue to strengthen its ability to identify, assess and address modern slavery risks, including the evolution of and enhancements of its due diligence processes and controls. We will review and update our policies, practices and procedures, as required, to maintain appropriate safeguards against any mistreatment of persons involved in our business.

Throughout FY23, our modern slavery committee will focus closely on the below:

- Focus to bolster and drive training and awareness programs with our external stakeholders
- Extend the deep dive supplier assessment process to all new suppliers that meet the threshold
- Further strengthen our supplier audit and assurance activities, in line with the contractual obligations we have implemented
- Continue the internal assurance programs around our procurement activities by using our modern slavery framework and developing new toolsets to support these processes, including the supply chain audits
- Continue engagement with suppliers to raise awareness and improve performance and corrective actions to mitigate risk.
- Further strengthen our process for managing suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including potential termination of the business relationship.
- internal audit and assurance program which measures the effectiveness of our control framework. This includes compliance with our policies.



# 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.	6
2	Section 16 (b) Describe the reporting entities structure, operations and supply chains.	9
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.	11
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.	12
5	Section 16 (e) Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks.	13
6	Section 16 (f) Describe the process of consultation with: (i) any entities that the reporting entity owns or controls	14
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**

where the cloud lives™

1 July 2021 to 30 June 2022  
NEXTDC Limited  
ABN 35 143 582 521

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).