

DIVERSITY, EQUITY AND INCLUSION POLICY

NEXTDC Limited and its subsidiaries (ACN 143 582 521)



N E X T D C

This policy aims to create and maintain a diverse, equitable, and inclusive (DEI) workplace where all employees are treated with respect and dignity. This policy applies to all employees of NEXTDC, regardless of their race, colour, religion, sex, national origin, age, disability, sexual orientation, gender identity, or any other protected characteristic.

Overview

NEXTDC's workforce comprises many individuals with diverse skills, values, experiences, backgrounds and attributes, including those gained on account of their gender, age, ethnicity and cultural background. NEXTDC values and is proud of its strong and diverse workforce. It is committed to supporting and further developing this diversity through attracting, recruiting, engaging, and retaining diverse talent and aligning the Company's culture and management systems with this commitment. NEXTDC strongly believes that such a commitment to DEI creates a competitive advantage and enhances employee participation, which is essential to the organisation's success and growth.

Nothing in this policy shall be taken, interpreted or construed to endorse:

- the principal criteria for selection and promotion of people to work within the Company being other than their overall relative prospect of adding value to the Company and enhancing the probability of achievement of the Company's objectives;
- any discriminatory behaviour by or within the Company contrary to the law, or any applicable codes of conduct or behaviour for the Company and its personnel; and
- any existing person within the Company being prejudiced by this policy in their career development or otherwise, merely because their diversity attributes at any time may be more, rather than less, common with others.

Definitions

- **Diversity** is the variety of differences and identities that exist among people, such as race, ethnicity, gender, sexual orientation, age, disability, and religious beliefs.
- **Equity** is the equal treatment, access, opportunity and advancement for people,, whilst acknowledging societal disparities and barriers.
- **Inclusion** is the act of creating a welcoming and supportive environment where everyone is valued and respected and feels a sense of belonging.

Key Strategies

The Company is committed to providing and promoting a corporate culture that embraces DEI as mentioned above and aims to do so by:

1. promoting the principles of merit and fairness when making decisions about recruitment, development, promotion, remuneration and flexible work arrangements;
2. having an overall transparent process for the review and appointment of senior management positions and Board members;
3. recruiting from a diverse pool of qualified candidates, engaging where practical a professional search / recruitment firm, advertising vacancies widely, making efforts to identify prospective employees who have diversity attributes and ensuring diversity of members on the selection /

- interview panel when selecting and appointing new employees (including senior management) and new Board members;
4. Continue to incrementally grow the number of women employment and women performing senior roles;
 5. embedding the importance of DEI within the Company's culture by encouraging and fostering a commitment to diversity by leaders at all levels whilst recognising that diversity is the responsibility of all employees;
 6. recognising that employees may have domestic responsibilities; and
 7. continuing to review and develop policies and procedures to ensure diversity within the organisation.

Key Initiatives and Programs

The Company aims to introduce and / or maintain the following programs and initiatives to assist with improving DEI within the organisation:

1. mentoring programs;
2. career opportunity and targeted professional development programs including those aimed at helping employees develop skills and experience in preparation for senior management and board positions;
3. work life balance policies including flexible work options, paid parental leaves, return to work programs and the like; and
4. networking opportunities.

Measurable Objectives, Targets and KPIs for Gender Diversity

1. The Company will set and implement measurable objectives, targets and / or key performance indicators (KPIs) to achieve gender diversity.
2. Management will develop, for approval by the Board or its relevant subcommittee, as appropriate:
 - a) the measurable objectives; and
 - b) the targets and / or KPIs to verify progress towards attaining those measurable objectives.
3. Management will also measure the performance of the measurable objectives against those targets and KPIs.

Responsibilities

The Board is ultimately accountable for this policy. The Chief Executive Officer (CEO), the Head of People and Culture and members of senior management are responsible for implementing this policy and monitoring compliance with it. The Chief Risk Officer (CRO) with input from Head of People and Culture is responsible for the administration of the policy (including in relation to reporting to the Board, or its relevant subcommittee as appropriate).

Reporting

The Company is committed to meeting its reporting obligations with respect to "Diversity" under the ASX Corporate Governance Principles and Recommendations (ASX Recommendations) and any other applicable regulatory requirements, including but not limited to the following:

- The proportion of women and men on their board of directors and in their senior management team.
- The proportion of directors and senior managers from First Nations backgrounds.
- The proportion of directors and senior managers from culturally and linguistically diverse backgrounds.
- The company's diversity policies and practices.
- The company's progress in achieving its diversity goals.

NEXTDC's performance against this Policy can be found in its annual Corporate Governance Statement, Environmental, Social and Governance Report (ESG) and the Workplace Gender Equality Report for the relevant period. These reports are published in the Corporate Governance section of NEXTDC's website.

Review

This Policy is reviewed at least annually by NEXTDC Senior Executive Management (CXO) and presented to the Board for approval.