

FY20 ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT



N E X T D C





N E X T D C

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A LETTER FROM THE CEO



Craig Scroggie
CEO

A year of unprecedented disruption to our personal and business lives has proven that the data centre and cloud infrastructure industries are more crucial than ever. Digital infrastructure is an essential service for governments, enterprise and communities. Our business has seen growth and demand at unparalleled levels as public, private and Government organisations accelerate their digital transformation, driven by both customer demand and requirements imposed by the COVID-19 pandemic. One might say that as-a-Service, virtual infrastructure and colocation close to these clouds is more than a rising megatrend, but the foundation of digital transformation and a phenomenon that has only been accelerated by the current global health crisis.

The extraordinary events that have unfolded globally introduced new barriers to traditional business models including social distancing, closed borders, grounded flights and disrupted supply chains. In a matter of weeks, the global economy was forced to re-think how people and organisations interact,

collaborate, and sell, with businesses immediately turning their focus to their infrastructure platforms to support new ways of working. These macro impacts on all industries have in-turn driven exponential increases in data usage and therefore increased the dependence organisations and individuals have on digital infrastructure. These circumstances reinforce the importance of our ESG approach and the role NEXTDC plays in supporting individuals, businesses and communities. We expect more businesses to rely on our services and will seek to understand our stakeholders' evolving needs.

Prior to the pandemic, megatrends such as cloud computing, blockchain, the internet of things, mobile 5G, virtual reality, augmented reality and artificial intelligence were already driving extraordinary data centre growth. That trajectory continues upward and if anything, is accelerating. Social distancing introduces new tyrannies of distance that are best bridged through digital technology which keep organisations connected to their teams, customers, partners, and suppliers.

NEXTDC has two key pillars for promoting and continuously driving sustainability across our organisation:

ENVIRONMENTAL SUSTAINABILITY



NEXTDC is committed to assessing and reducing the environmental footprint of its data centres. We are focussed on the continuous improvement and delivery of sustainable initiatives.

SOCIAL SUSTAINABILITY



NEXTDC demonstrates commitment to corporate values in dealings with our customers, our team and wider stakeholders. These values are reflected in our Corporate Social Responsibility, Employee Code of Conduct, Supplier Code of Conduct and other related policies. Social sustainability improves team engagement, customer loyalty and supplier relationships, which results in improved productivity. We categorise and prioritise the most relevant sustainability issues that affect the organisation and our stakeholders.

Accelerated 4th industrial revolution

Our dependence on information is deeper than ever. Analysts estimate that the amount of data being generated across the world is doubling every two years. Industry analyst IDC forecasts there will be over 180ZBs of data generated by 2025 – a number calculated prior to COVID-19. Research from IDC estimates that the pandemic has advanced the urgency for digital transformation by 3-5 years. As we negotiate this transitional time in human history, our challenge as an industry is to sustainably manage the vast quantity of high-powered computing hardware that is running 24 hours per day, 365 days per year, with the focus on facilitating digital change.

The value proposition for colocating this equipment within data centres have been largely proven. What is not quite so understood is how much power and water it takes to run a data centre. How well data centre companies minimise the environmental impact of these operational requirements will increasingly influence customer choice as computing loads continue to multiply.

Innovating to meet spiralling energy consumption challenges

At NEXTDC, we know that by applying design, engineering, and operational excellence to reduce energy consumption, we can create market differentiation and limit the unintended consequences of digital transformation on future generations. We place extremely high priority on reducing energy usage and consumption of our planet's finite resources as well as preserving the environment locally, nationally and globally.

Without compromising on the safety and resilience of our facilities, we endeavour to innovate across all areas of the business to reduce energy and water consumption. Our efforts have been recognised globally by some of the industry's most esteemed commentators. Further details relating to awards NEXTDC has been recognised for from global organisations such as DataCenter Dynamics and Frost & Sullivan can be found in the FY20 Annual Report.

Setting a new benchmark for energy efficiency

With the transformational pressures experienced in the current environment NEXTDC is devoted to driving continuous improvement in energy efficiency and sustainability. Our facilities are designed, engineered and operated at a level of energy efficiency that is superior to competitors in the market. It is an achievement that also allows us to support our customers in their efforts to reduce their carbon footprint and impact on the environment.

Our industry-leading Power Utilisation Effectiveness (PUE) ratios, National Australian Built Environment Rating System (NABERS) 5-Star rated facilities and carbon neutral corporate operations are key outcomes from our commitment to environmental sustainability. PUE is a metric that matches total energy consumption by a data centre in comparison to the load required to run the computer equipment in the facility. In FY20, we achieved a national average PUE of 1.3 compared to the industry average of approximately 1.7. The difference is very significant indeed and a testament to the focus we apply to energy efficiency.

NEXTDC is the only data centre operator in the country to achieve a NABERS 5-Star rating for energy efficient buildings with that level of certification applying to the M1 and S1 data centre facilities. The M1, S1, C1, B2 and P1 data centres are all certified being under the ISO 14001 certification for Environmental Management Systems. Our second-generation data centres B2, M2 and S2 have all been designed to meet, if not exceed, the current energy efficiency standards and ISO 14001 certification.



Carbon neutral operations

NEXTDC's environmental credibility is based upon transparency in established accountability metrics. We focus on measurable objectives to reduce the environmental impact of our data centres through minimising power usage and carbon emissions.

We continually tune our Mechanical and Electrical Plant (MEP) in real-time to maximise energy efficiency in the environmental conditions prevailing at the time. We also proactively seek to reduce the risk of any environmental incident at our sites and strive to reduce the Company's contribution to landfill.

We take every action to minimise carbon emissions but where we can't avoid it, we procure carbon credits through the Qantas Future Planet (QFP) program. We delivered yet another industry first by having the carbon emissions of our corporate operations audited and accredited under the Australian National Carbon Offset Standard (NCOS - now known as Climate Active) as 100% carbon neutral. NEXTDC is proud to own and operate its own solar array on the roof of its M1 data centre and has also to be a Principal Partner to the Melbourne Renewable Energy Project (MREP) since its inception in 2014. Financial close on this project was achieved during FY18, and the 80MW Crowlands Wind Farm in Victoria was opened in February 2019. This was another first for a data centre operator in the Asia Pacific region.

Partnership with Qantas

Continuing our focus on leadership through industry innovation, NEXTDC's corporate operations have been independently assessed and accredited as carbon neutral under the Australian Federal Government's Climate Active program. Forming a strategic partnership with Qantas, NEXTDC became the first data centre operator in the region to achieve carbon neutrality by purchasing carbon credits through the Qantas Future Planet (QFP) carbon offset program. Our long-term goal is to help every one of our customers to achieve 100% carbon neutral corporate operations when they colocate at any of our facilities, which would be a first in the Asia Pacific region.

Reducing our environmental impact

The minimisation and management of waste streams from all human activity is also an area of increasing focus. Under NEXTDC's Waste Management Policy, and employing the principles of a circular economy and a waste hierarchy, waste is (in order of preference) avoided, reduced, reused, recycled, recovered, treated and finally disposed, only when no other avenue is available. Alongside this, water management remains a key focus for NEXTDC as we plan and manage our short and long-term water needs to further reduce our environmental impact.

The safety of our people is paramount

We are dedicated to continuous improvement in everything we do. We have also embedded world-class safety standards into the heart of our operational and corporate culture. Safety is a vital factor in the success of NEXTDC. We place the highest priority on the safety of every person who physically engages with our business and encourage a culture where safety comes first and is everybody's responsibility.

Our goal is to achieve zero-injuries for employees and visitors to our data centres, a focus that has seen very positive safety results in FY20 and on which we comment on more detail below. We strive for continuous improvements, ensuring we eliminate the potential for anything which may pose a safety risk to anyone who works in or visits a NEXTDC premise and/or uses NEXTDC services.

Improving our society through giving back

In FY20, we continued to extend our Corporate Social Responsibility (CSR) programs by helping to improve society and our local communities. NEXTDC's 'Live to Give' program was established to improve the communities in which we live and work. NEXTDC's 'Live to Give' program comprises the following:

- Corporate partnership with The Smith Family, donating approximately \$50,000 in FY20 and \$168,000 since launching the program in FY19 in addition to staff volunteering days and mentor program
- Partnership with Pledge 1%, enabling staff to devote 1% of their time to give back by participating in community and charitable endeavours
- Workplace giving programs with \$1:\$1 donation matching for Cancer Council, Beyond Blue, The Smith Family and UN Women; and
- One paid Volunteer Day each year, allowing teams and individuals to spend time with their preferred charity or in giving back to their local community.

Fostering a diverse and inclusive culture

Despite the pressures of rapid growth which has seen total employee numbers grow from 50 in 2012 to 248 as at 30 June 2020, we have strong staff retention ratios across the board. When you exclude casual and part-time staff, 39% of our staff have been with NEXTDC for three years or more, a metric that scores well against IT industry benchmarks.

NEXTDC excels when measured against many diversity and inclusion metrics in the corporate environment and particularly in the IT industry, more specifically in the data centre space. Over 33% of staff are female while our ethnic diversity closely represents the multicultural profile of Australia. We developed a parental leave program that is well ahead of regulatory obligations and industry averages, with primary caregivers given up to 20 weeks paid leave. We also offer 10 keeping-in-touch days to ensure a smooth and comfortable transition back into the workplace for returning parents.

We have built a healthy culture where people join our company and build long-term successful careers that challenge and empower them to grow and be the best version of themselves, everyday. At NEXTDC, we take our obligation to the environment and social sustainability very seriously and strive for full transparency in the way we conduct our business. We believe that our decisive actions today will make a big difference to the environment and our society tomorrow.

NEXTDC's business is conducted in a manner consistent with practises outlined by the United Nations Guiding Principles on Business and Human Rights. In addition, NEXTDC's supplier assurance program specifically addresses compliance with the Modern Slavery Act 2018 (Cth) which requires us to report on and action any risks of modern slavery identified in our operations and supply chains. There are more details about NEXTDC's stance on upholding accepted global standards for human rights within our operations and supply chains within this report.

Our work in this important sphere is ongoing. As an organisation, we will continue to innovate and invest in ways that further improve our sustainability performance so that we can meet the increasing customer, community and regulatory expectations around preserving our planet for future generations.



Craig Scroggie
CEO

OVERVIEW



About this Report

This report has been prepared in accordance with the Global Reporting Initiative (GRI) Standards - Core option. The GRI is an international, independent organisation that helps businesses communicate their impact on critical sustainability issues. It produces one of the most recognised standards for sustainability reporting, which enables organisations to measure and understand their impact on the environment, society, and the economy. By using the latest version of the GRI Core Standards, including recent revisions of certain topic-specific standards, NEXTDC ensures that it reports against the environmental and social issues identified as being significant to its business and stakeholders. For easy reference to our reporting disclosures, the GRI Index is also provided at the end of this Report. NEXTDC's FY20 Environmental, Social and Governance (ESG) Report covers all its operations within Australia for the financial year ending 30 June 2020, unless otherwise stated.

Assurance

No external assurance was sought on the details within this report. All details within this report have been reviewed and assessed internally and were approved for publication by the NEXTDC Board.

where the cloud lives™



SUSTAINABILITY HIGHLIGHTS AND VALUES



FY20 SUSTAINABILITY HIGHLIGHTS

S1 Sydney achieved a NABERS 5-Star rating for energy efficiency in FY20, an upgrade from the previous 4.5-Stars as a result of further tuning and efficiencies in the design of the facility, while M1 Melbourne has maintained its NABERS 5-Star rating throughout FY20.

Proactive action on the COVID-19 situation where the Steering committee was established very early in February to manage responses.

M2 Melbourne achieved Uptime Institute (UI) Tier IV Gold Operational Sustainability certifications following P1, S1 and B2 previously.

NEXTDC's corporate operations were accredited 100% carbon neutral under the Australian Federal Department of Environment and Energy's Climate Active (formerly NCOS) program administered by the Australian Federal Department of Environment and Energy.

FY20's annual employee survey had an 81% engagement rate with very positive feedback in the areas of social connection, diversity and inclusion and company confidence which reflects the strong faith employees have in NEXTDC's overall strategic direction.

Maintaining its strategic partnership with Qantas, NEXTDC will source carbon offset credits from Qantas Future Planet (QFP) to meet ongoing compliance requirements under the Climate Active (formerly NCOS) scheme. NEXTDC has maintained 100% carbon neutrality for its corporate business operations throughout FY20. Our end goal is to also help our customers achieve 100% carbon neutral operations when they colocate at one or more of our data centres.

A significant decrease in voluntary turnover rate from 20.1% in FY19 to 14.1% in FY20.

P1 Perth obtained ISO 14001 Environmental Management System certification.

Principal Partner to the Melbourne Renewable Energy Project (MREP) since its inception in 2014. Alongside City Councils, Universities and other corporate organisations in the MREP consortium, NEXTDC continues to be committed to a Power Purchase Agreement (PPA) which supported the construction of the 80MW Crowlands wind farm in Victoria, which went live in January 2019.

Commenced work to mitigate modern slavery risks in line with the Modern Slavery Act 2018 (Cth).



COMPANY PROFILE

NEXTDC Limited is a public company listed on the Australian Securities Exchange (ASX). The Company has nine data centres across Australia including Brisbane, Canberra, Melbourne, Perth and Sydney with its headquarters located in Brisbane. 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 FY20 Annual Report.

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.

The Company's commitment to its values, ethics and compliance foster a culture that, we believe, attracts the highest-calibre employees, and builds and enhances our customer relationships.

Our Board of Directors, drive culture and accountability. They ensure our values are reflected in the Company's operations and our day-to-day activities, are carried out in accordance with our Code of Conduct. Our Code of Conduct and the way we live our values is central to our behavioural expectations and promoted at all levels of the business. Breaches to the Code of Conduct may result in disciplinary action including dismissal in serious cases.

The Board has three sub-committees: The Audit and Risk Management Committee (ARMC), the Remuneration and Nomination Committee (REMCO) and the Investment Committee (IC). NEXTDC maintains a majority independent Board and maintains its sub-committees consistent with the recommendations of the ASX Corporate Governance Council (4th edition). The Company also has a Work Health and Safety (WHS) Committee, which meets monthly and provides WHS reports to the Board. Other key Company policies include a Whistleblower Policy, Supplier Code of Conduct, Privacy Policy, Diversity Policy and Anti-Bribery and Corruption Policy, all of which are available in the Corporate Governance section on NEXTDC's website at www.nextdc.com/our-company/corporate-governance.

Our Corporate Values



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.



RISK MANAGEMENT

NEXTDC's robust approach to risk management is shown in its operational planning and the development of new products and facilities. The growth of NEXTDC as a company over the last few years has significantly evolved our risk profile. An independent review of our Risk Management Framework was carried out in FY20 to align our risk management practices to the evolution of the Company, its risks and opportunities moving forward. This included a revised Risk Appetite Statement endorsed by the Board.

The evaluation of climate change and environmental risks and opportunities are integrated into our Risk Management Framework, as one of the seven pillars of focus in managing our enterprise-wide risks. The primary responsibility for this process lies with the management with an oversight provided by the ARMC and the Board. Further details on our Risk Management Framework and approach can be found in our annual Corporate Governance Statement available in the Corporate Governance section of our website.

Being Australia's leading Data Centre-as-a-service (DCaaS) provider, and as Australia's first and only NABERS 5-Star infrastructure rated colocation data centre is testament to our commitment to manage our environmental risks and impacts. When building new data centres, NEXTDC assess and seek to mitigate environmental risks, by considering:

- The effect construction might have on cultural heritage sites
- Its environmental impact of the site's construction and operation
- The generation of excessive dust and/or noise; and
- The development of an effective waste management plan.

Being a responsible business that also manages its social and environmental issues and responsibilities through its supply chain continues to be a focus for NEXTDC. As part of our third-party risk management process, our contractors are required to submit an Environmental Management Plan to advise NEXTDC on how they will minimise their impact on the environment where it is applicable. The effectiveness of environmental controls is included in the vetting and review process of new and existing suppliers. These are tracked and monitored via our internal assurance process. Our response to the COVID-19 crisis and steps undertaken to manage the associated work, health and safety risks is further addressed below.

COVID-19 risk management

Whilst we have seen COVID-19 have significant societal and business impacts, it has also affected NEXTDC directly, with the business seeing changes across numerous business environments. This has required the company to continuously evaluate its position when responding to operational health issues and stakeholder feedback. NEXTDC's focus has been on ensuring the continuity of its business and health of its team and customers, mindful of a robust management and segmentation of its work force to ensure resources and staffing are available should these be required.

NEXTDC management has been fully compliant with all health guidelines issued by relevant Australian health authorities including State and Federal Governments. There have been no confirmed cases of COVID-19 amongst its staff in FY20. A policy of social distancing has been a key part of our Pandemic Plan and the activation of our overarching Business Continuity Plan. Our COVID Management Committee has been a key part of our COVID-19 pandemic response. The Committee met daily until April 2020, and a governance structure was established to respond to the ongoing changes and requirements. The Committee makes informed decisions to manage the evolving situation, translated into specific COVID safe plans that were established and updated throughout the different stages of this pandemic. Further working groups consisting of site management and operational leaders were also established to implement and manage these Plans at the ground level. The Committee now meets at least once a week and will continue to do so for as long as it is required.

Besides implementing appropriate processes throughout all facilities, including increased sanitisation, our interactions with customers, vendors and suppliers to NEXTDC have been standardised to ensure a consistent and appropriate approach on health practises when dealing with persons attending any NEXTDC facility. Access and sanitation protocols were based on the different stages advised by the authorities during the rise of the pandemic and have continued to be adjusted and optimised for best effect and protection. Our security and operations team continue to manage these issues closely under the supervision of our executive and COVID Management Committee. All staff, other than those involved in the day-to-day running and ongoing construction and development of NEXTDC's data centres have been directed to work from home until further notice and provided with all necessary support to do so. All non-essential business travel has been deferred until further notice, except under exceptional circumstances, where no alternative is available, and does not breach any mandated requirements from the authorities. Additionally, any staff returning from international travel are required to self-isolate for at least 14 days.

In addition to the above, a mandatory online training on 'Infectious Disease Awareness in the Workplace' was rolled out to all employees in March 2020. The training was aimed to not only create awareness of the pandemic and the restrictions but to educate our team on its history, potential impact, the signs and symptom of the disease as well as prevention, and isolation processes.

As the uncertainty surrounding COVID-19 begins to resolve, NEXTDC's comprehensive COVID-19 plan not only prepares the Company for a return to full operations in the 'new normal' world, but continues to remain at settings that are cognisant of an ongoing health threat.



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The safety, health and wellbeing of our staff and customers is our most important priority. I am very proud of our team's emergency response preparedness during these uncertain times for the global community. We are taking all actions necessary to support our customers' rapidly evolving needs. We see the impact to the global community of these global health challenges ushering in a new way of working that will further accelerate the demand for highly resilient online technology services such as those that sit on NEXTDC's world-class infrastructure platform. The Company expects these universal changes to the way we live and work as strong tailwinds that will further accelerate the demand for our world leading data centre services”

- Craig Scroggie, CEO

STAKEHOLDER ENGAGEMENT



Meaningful stakeholder engagement builds trust and confidence in the communities in which NEXTDC operates. Our key stakeholders are identified based on the level of interest, potential impacts and opportunities related to the operation of our data centres with a summary of key stakeholders and our engagement with them in FY20 is detailed below:

Stakeholder	ESG Expectations and Concerns	How NEXTDC communicates and consults with them
NEXTDC Employees	Keeping the workplace safe Environmental impacts Diversity and Inclusion Codes of Conduct Protecting Personally Identifiable Information (PII) COVID-19 compliance	NEXTDC Values WHS Committee meetings Code of Conduct, Diversity and other annual training sessions Information regularly posted on intranet, which also provides opportunity for feedback Induction and People and Culture policies and procedures
Customers	Keeping the workplace safe Environmental impacts Protecting Personally Identifiable Information (PII) COVID-19 compliance	Site Induction and Facility Rules Privacy Policy and Privacy Collection Statements Service Advisory Notifications Weekly/Monthly/Quarterly meetings
Shareholders and their Advisors	Material and ESG risks that may affect NEXTDC and how they are being managed	ESG report, disclosure of ESG risks in the Annual Report, AGM and Roadshows
NEXTDC Board of Directors	Material and ESG risks that may affect NEXTDC and how they are being managed	Regular reports and meetings with the Board and Audit and Risk Management Committee
Regulators/Authorities (e.g. WorkCover/EPA/Clean Energy Regulator/WGEA)	Keeping the workplace safe Environmental impacts Complying with regulatory requirements	Obtaining required approvals for constructing new data centres – extensive due diligence for site selection Immediate contact for any notifiable incidents Submission of an annual National Greenhouse Gas and Emissions Report (NGER) to the Clean Energy Regulator Annual report submission to Workplace Gender Equality Agency (WGEA) Modern Slavery Act 2018 (Cth.)
Suppliers and Contractors	Keeping the workplace safe Environmental impacts Protecting Personally Identifiable Information (PII) COVID-19 compliance	Site Induction and Facility Rules Site meetings and permit to work for all hazardous works Supplier Code of Conduct Privacy Policy and Privacy Collection Statements
Community	Impact of constructing new data centres	Extensive due diligence on site selection, including impact to flora and fauna, cultural heritage and artefacts.

Industry associations

NEXTDC is actively involved in the following industry associations and represents the data centre sector in achieving its business objectives:

- Communications Alliance – Communications Resilience Administration Industry Group
- Communications Alliance – Building Access Operations and Installation
- Communications Sector Group
- Member of Trusted Information Sharing Network for Critical Infrastructure (TISN)
- Involved in the Communications Criticality Project
- Climate Active (formerly NCOS) for Carbon neutrality activities; and
- Member of National Safety Council of Australia.

In FY21, NEXTDC intends to undertake a full review of its industry associations and memberships to ensure our participation meets the expectation of our broader stakeholders with a particular focus on climate change and energy policy.

MATERIALITY ASSESSMENT

NEXTDC has followed the GRI's Reporting Principles for defining report content in structuring and detailing this report. In accordance with the GRI Standards, the Company has identified the material topics that reflect the organisation's significant economic, environmental, and social impacts or which substantively influence their assessment or those of its stakeholders. NEXTDC has identified these based on its annual review and stakeholder feedback.

NEXTDC self-assessment exercises in FY20 included internal and external workshops with NEXTDC employees and a wide range of external stakeholders. Materiality was validated by subject matter experts and the Executive team.

Our material topics remained largely consistent with the previous year; however, the annual review helped us broaden these to capture emerging issues. Key changes included:

- Reframing of 'Employee Retention and Loss of Talent' to 'Diversity, Employee Retention and Loss of Talent' to reflect our increased focus on diversity initiatives
- Introduction of 'Climate change initiatives and disclosure' to reflect growing expectations for organisations to disclose how they manage climate related risks and opportunities over the short, medium and long-term; and
- Introduction of 'Human rights including modern slavery and management' to reflect our focus on strengthening supplier due diligence practices and approach to complying with new legislative requirements following the introduction of the Modern Slavery Act 2018 (Cth).

NEXTDC's FY20 key material topics and their boundaries are identified in the table below:

Material Issue	GRI Material Aspect	Boundary ¹	Reporting
Energy Consumption	Energy, Emissions, Compliance and Supplier Environmental Assessment	External (Communities)	Environmental Sustainability and Performance
Employee Health and Safety	Occupational Health and Safety	Internal (Employees)	Social Sustainability
Diversity, Employee Retention and Loss of Talent	Training and Education, Diversity and Equal Opportunity	Internal (Employees)	Social Sustainability
Breach of Privacy Information	Customer Privacy	External (Customers)	Social Sustainability
Social Impact of the Business	Socio-economic Compliance	External (Communities)	Social Sustainability
Legal Compliance	Anti-Corruption and Anti-Competitive Behaviour	Internal (Employees)	Social Sustainability
Climate Change	Emissions and Environmental Compliance	External (Communities)	Environmental Sustainability and Performance
Human Rights including Modern Slavery and Management	Social impact on the business and Supplier Environmental Assessment, Diversity and Equal Opportunity	Internal (Employees)	Social Sustainability

¹Internal boundary refers to entities over which NEXTDC has direct control and the people and contractors employed by those entities. External boundary refers to people and entities outside of NEXTDC's direct control.

ENVIRONMENTAL SUSTAINABILITY AND PERFORMANCE



NEXTDC is devoted to driving continuous improvements in energy efficiency and sustainability as its facilities are designed, engineered, and operated at a level of energy efficiency that is superior. NEXTDC is dedicated to monitoring, tuning, and continuously improving the way we manage our data centres, in order to:

- Deliver the highest levels of energy efficiency
- Minimise our impact on the environment and natural resources; and
- Meet and exceed the minimum environmental legislative requirements.

NEXTDC's Energy and Environmental Policy has been established to achieve the above by setting meaningful and achievable objectives and targets, overseen by NEXTDC management and the Board.

ENVIRONMENTAL TARGETS

NEXTDC acknowledges that our customers and our data centres have increasing IT power requirements year-on-year. NEXTDC controls the non-IT power usage portion of the data centre environment. The performance of this is measured through Power Usage Effectiveness (PUE), an internationally accepted standard metric used to rate the efficiency of each of NEXTDC's data centres. This represents the ratio of total power consumption divided by the usable power delivered to customer IT equipment. A low ratio represents effective reuse and recycling of heat in a data centre facility.

In FY20, the total power consumed by all NEXTDC nationwide reached 250,344MWh with the average PUE across all data centres being 1.30. It compares very favourably with an Australian industry average of approximately 1.7. Targeted adjustments in the MEP's operation improve our operational efficiency and enable us to gain higher NABERS ratings. NEXTDC's operations and approach to carbon emissions is compliant with the Australian Federal Government's National Greenhouse and Energy Reporting Act 2007 and all associated guidelines pertaining to that statute.

NEXTDC's environmental risks and opportunities are integrated into its Enterprise-wide risk management processes and are managed as part of the overall business strategy. Facility level risk assessments are undertaken regularly as part of planning processes which considers operational and environmental risks, constraints, and challenges.



NEXTDC recorded an average PUE of **1.30** across its facilities in FY20, well below the target of 1.40.

ENVIRONMENTAL OBJECTIVES

The following environmental objectives remained as NEXTDC's focus in FY20:

➔ Design, commission and tune MEP to maximise energy efficiency

➔ Reduce the risk of an environmental incident, such as a diesel spill or discharge of pollutant

➔ Minimise carbon emissions

➔ Minimise NEXTDC's contribution to landfill

OBJECTIVE 1 –

Design, commission, and tune MEP to maximise energy efficiency

In FY20, NEXTDC continued to engage in various initiatives to minimise and continuously improve its PUE rating:

Continuous tuning of MEP for maximum efficiency

NEXTDC's engineering team continued to seek the most efficient settings for the MEP to obtain further reduction in PUE as each of the data centres fill with customers, based on the following parameters:

- Using MEP data to help predict trend of IT load over the year and adjusting MEP operational parameters accordingly
- Greater and proactive management of cooling plant efficiencies; and
- Reducing the MEP used for a given level of demand (less MEP plant driven at higher load is more efficient).

Implementing the latest data centre recommendations from The American Society of Heating, Refrigeration and Air Conditioning Engineers (ASHRAE)

For the newest data centres, the data hall supply air temperature has been increased from 22 to 25 degrees Celsius with relative humidity across a much broader band, which allows NEXTDC to improve energy efficiency without reducing infrastructure reliability.

Optimum placement of the floor grills

Careful management of floor grill placement increases the temperature of the return air from the data halls, which improves the efficiency of the cooling plant.

Air-side free cooling

The use of external air sources, coupled with the optimum placement of floor grills, further improves energy efficiency.

Water-side free cooling

Depending on the weather conditions, external air sources can be used to cool water, a process which will activate automatically at M1, M2, S1, S2, B2 and P1 to drive the cooling plant efficiency. P2, which was fully commissioned in July 2020, has the same operational capabilities.

Rack blanking panels

Racks are checked regularly, and blanking panels are placed in the empty spaces, which significantly reduces the energy required to cool the data halls.

Energy monitoring systems

An extensive project involving the collection of accurate performance data. Targeted adjustments in the MEP's operation improved our operational efficiency to enable higher NABERS ratings.

Fan speed tuning

A process for on-going monthly operational checks was implemented in FY20 to further optimise the efficiency of the data centre cooling systems.

OBJECTIVE 2 –

Reduce risk of environmental incident

NEXTDC continues to conduct quarterly business reviews of its suppliers' efforts to minimise their environmental risks, including a detailed review of supplier's Safe Work Method Statement (SWMS). All the suppliers reviewed in FY20 have met the mandatory environmental requirements.

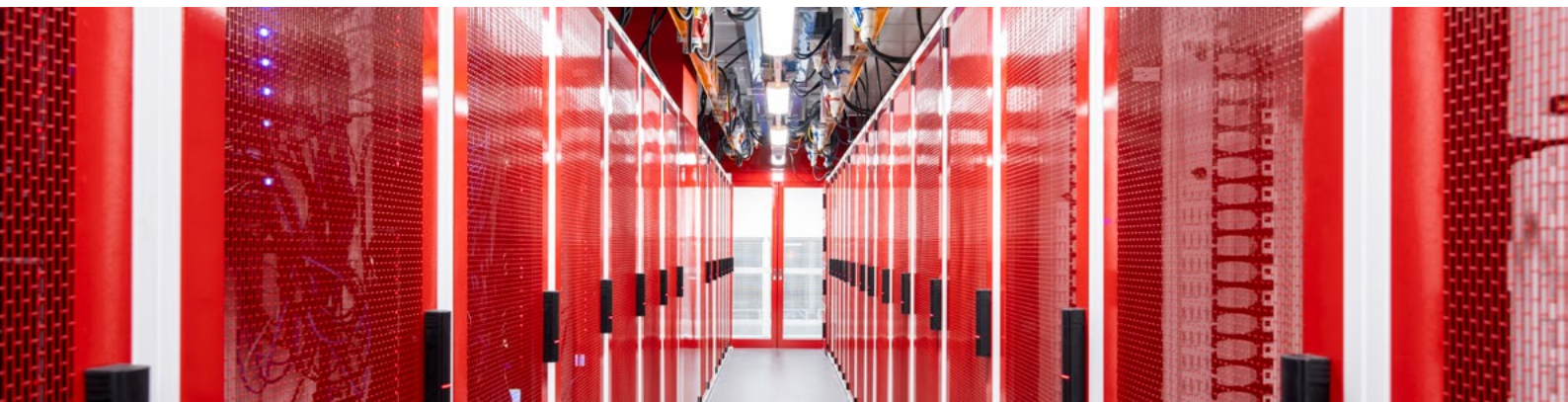
In addition, NEXTDC has improved its internal procedures and staff training in relation to preventing environmental incidents, and environmental incident response. Staff training at each facility has included a re-enactment of a diesel spill to actively practise how to use the spill kits and other activities which would negate or reduce the effect of this type of incident.

OBJECTIVE 3 –

Minimise carbon emissions

NEXTDC's material sources of carbon emissions relate to grid supplied energy and diesel use. Through careful management of engine testing regimen NEXTDC endeavours to keep non-emergency use of diesel to a minimum. Over the reporting period, NEXTDC consumed 160kL of diesel nationally representing 862-hours of diesel supported load. This is reflected in a significant reduction in the total Scope 1 emissions from the previous reporting period.

NEXTDC's generators are also set to run at maximum efficiency, which reduces their emissions. NEXTDC monitors its carbon emissions for reporting and participates in the National Greenhouse and Energy Reporting Act (NGER) initiative by the Clean Energy Regulator annually. NEXTDC's carbon emissions are offset through an internationally recognised carbon offset program. NEXTDC also plans to offer a carbon offsetting program to customers who wish to offset their carbon emissions in NEXTDC facilities, with an end goal of customers also having the option to achieve 100% carbon neutral operations when they colocate at any NEXTDC data centre.



OBJECTIVE 4 –

Minimise landfill contribution (Waste Management)

Reducing waste generation through the prevention, reduction, recycling, and reuse of waste produced during operations is a priority for NEXTDC. In line with the Australian National Waste Policy 2018, we have adopted the waste hierarchy reflecting the principles of a circular economy, which seeks to retain the value of resources, through reuse, recycling, and reprocessing, for as long as possible to reduce the impact on the environment.

In FY20, we have continued to investigate options to minimise the volumes of general waste being sent to landfill. All waste generated across NEXTDC's operations is managed in accordance with NEXTDC's Waste Management Plan as well as the Hazardous Materials Management Procedure. The following reduction activities were carried out in FY20:

- Clearly marked bins for separate recycling streams such as 'cardboard and packaging materials' are made available for all customers and staff in all NEXTDC facilities. These include deploying coloured bins for general waste, cardboard waste, and commingled waste so customers and staff have the appropriate bin to dispose of their waste products. These are then collected routinely and disposed of accordingly.

- End life battery bins have been made available within the garbage rooms to ensure these are not disposed of within general waste. These are then collected routinely and recycled.
- NEXTDC does not permit disposal of e-waste in its bins. Clear signage is available around the disposal area to remind staff and customers of this.
- All replacement fluorescent lights are kept and placed into recycling boxes to ensure these are not disposed of within general waste. These are then collected routinely and recycled.

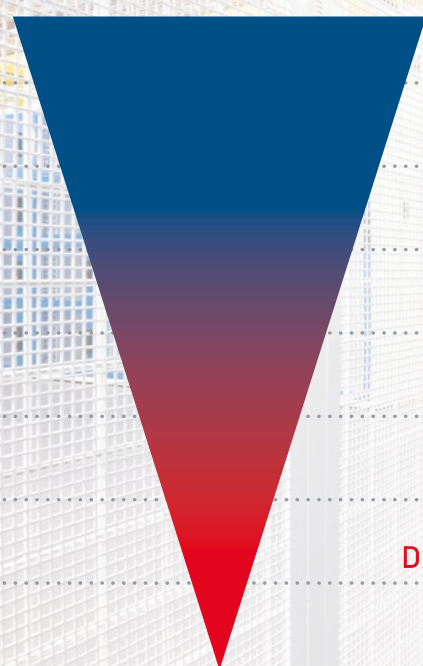
E-waste (computers, phones, etc) disposal options for customers have been trialled at our facilities over the last few months. An effective process has been established and will be placed into service at all NEXTDC facilities in Q1 of FY21.

NEXTDC's waste management initiatives are measured and shared with Management regularly with Facility Managers held accountable to site level targets.

NEXTDC produced 310 tonnes of waste during FY20, with 87 tonnes or 28% being recycled and prevented it from going into landfill. As NEXTDC continues to investigate and identify opportunities and options to minimise the volumes of waste within its facilities while providing its customers with a world-class data centre facility, we are committed to providing a more detail disclosure of our waste management data in FY21.

THE WASTE HIERARCHY

MOST PREFERABLE



Avoid Waste

Reduce Waste

Reuse Waste

Recycle Waste

Recover (Including Energy)

Treat (Including Hazardous Waste)

Dispose Waste

LESS PREFERABLE

Water management

Water is used as the main medium for heat transfer in and out of the data halls in our data centres. NEXTDC commits to optimising the use of water in its facilities by reusing, recycling, and recovering water to the extent possible as we plan and manage our short and long-term water needs to reduce our impact on the environment. Our proactive approach to responsible water management, as a minimum, complies with water licensing requirements set by industry regulators. Alternative water management options are explored to mitigate our impact on an ongoing basis. Analysing the facility design and identifying opportunity for improvement or extra measurement points to accurately collect data is an ongoing requirement for the Facility Managers as part of their quarterly goals. This will be fed into improvement plans and future data centre build designs.

The efficiency of NEXTDC's water usage is measured through the Water Usage Effectiveness (WUE) rating metrics for each of its data centres. NEXTDC has adopted this industry-standard metric which helps data centres measure how much water a facility uses for cooling and other operational needs. This represents the ratio of total site water used divided by IT equipment energy usage. A low ratio represents effective reuse and recycling of water in a data centre facility.

Water usage includes cooling, regulating humidity and producing electricity onsite. IT equipment energy includes any power drawn by hardware used in the day-to-day functioning of the data centre. WUE is tracked and reported as part of the weekly operational dashboard presented to Management. In FY20, NEXTDC's total water consumption was 346ML and we recorded an average WUE of 2.07.

Renewable energy

NEXTDC has always been proactive in working to reduce energy consumption and reduce its dependence on non-renewable energy sources, where practical and economical. NEXTDC is actively engaged in directly procuring and investing in renewable energy, in order to develop and execute a strategy that will ensure it transitions to renewable energy over the near to medium term while keeping its cost of electricity (and so the cost to its customers) in line with or better than market rates. Ideally, the respective local distribution grids will also provide improved levels of sustainably generated energy.

NEXTDC's M1 data centre has a 400kW rooftop solar array, which was the largest rooftop solar array in Australia at its

commissioning in 2014. In FY20, it produced 814MWh in renewable energy, which provided an offset of over 871 tonnes of CO₂. The array produced around 1.1% of the electricity used by NEXTDC's customers at M1, to reduce our peak demand for energy from the grid and continued to support the work done by the City of Melbourne in achieving its stated sustainability and clean energy goals.

NEXTDC is evaluating the installation of similar rooftop arrays at other facilities with feasibility assessments on-going. The installation of incremental cooling infrastructure previously precluded the installation of such an array at some of our facilities. As the facilities approach full capacity and incremental cooling infrastructure is no longer needed, rooftop solar becomes an option for generating renewable energy. Additionally, we are currently working with a number of electricity market participants on off-site renewable generation projects, with associated physical and financial hedges, to promote further reductions in our reliance on non-renewables and manage the procurement risk in switching to renewables.

Energy efficiency

NEXTDC builds and operates a national footprint of Australia's most energy efficient data centres which serves as a reminder that organisations can be engineered to both support the environment and improve business efficiencies. In 2018, M1 became the first data centre facility in Australia to achieve a NABERS 5-Star rating for energy efficiency. In FY20, NEXTDC has achieved the same for its S1 Sydney facility making S1 the only data centre facility in New South Wales and the second in Australia to achieve a NABERS 5-Star rating for energy efficiency. NEXTDC's continued investment and commitment into certification through NABERS has set new benchmarks in the country by achieving a level of certified energy efficiency not previously attained in the industry. NEXTDC's second-generation data centres will deliver even higher levels of energy efficiency, with B2, M2 and S2 showcasing world-leading engineering that will better support our business, the environment, and our customers' as well as stakeholders' long-term needs.

NABERS is a national rating system that measures the environmental performance of Australian buildings by measuring the energy efficiency, water usage, waste management and indoor environment quality of a building or tenancy and its impact on the environment. The rating scale ranges from one to six stars with six stars indicating market leading performance and one star that the building under review has considerable scope for improvement.

ENERGY SAVINGS FOR CUSTOMERS

By using NEXTDC data centres to power and cool their IT equipment, customers reduce their overall energy usage through efficiencies created by scale, specialist design and professional operations. These are key features of our highly efficient colocation data centres which usher in mutual energy efficiency benefits for all parties.

Sustainability during climate change

NEXTDC is committed to contributing to the global efforts in managing climate change and supports the shift towards a low carbon economy, in line with the Paris Agreement. This is evident in our efforts on carbon neutrality and embedding climate change risk management across our business processes.

The evaluation and management of climate change risks and opportunities are integrated into NEXTDC's risk management process to ensure a consistent approach to the recognition, measurement and evaluation of all risks and opportunities in this area. We are working to further improve our approach to climate change governance and to embed our climate change strategy and aspirations within our business operations. From a governance perspective, we will continue to define roles, responsibilities, and procedures at every level of our business to support this.

All NEXTDC's facilities are designed and constructed with sufficient redundancy to ensure that our customer's Service Level Agreements (SLA) for power, temperature and humidity are met, even if there is an energy outage or heatwave.

Fuel levels at each data centre are topped up to ensure the generators can continue to operate for up to 48-hours without any utility grid power. Emergency fuel supply contracts are in place with major fuel suppliers to cover the unlikely event of interruptions extending beyond that duration. NEXTDC's Uptime Institute (UI) certifications for our facilities reflect the exceptional fault tolerance of our data centres and their resiliency to the impacts of climate change. Staff and vendors are trained to operate and maintain the data centre in accordance with UI's Operational Sustainability best practice standards. These training programs have been rolled out nationally to all our data centres in FY20. NEXTDC's UI certification journey is further detailed in the 'External Initiatives' section of this report.

As an organisation we continue to push the boundaries and set a new global benchmark in data centre design to deliver the highest possible level of sustainability for our customers and our environment. We are responsible for building the critical infrastructure for the digital era that will support our future generations. This is a responsibility we take very seriously.



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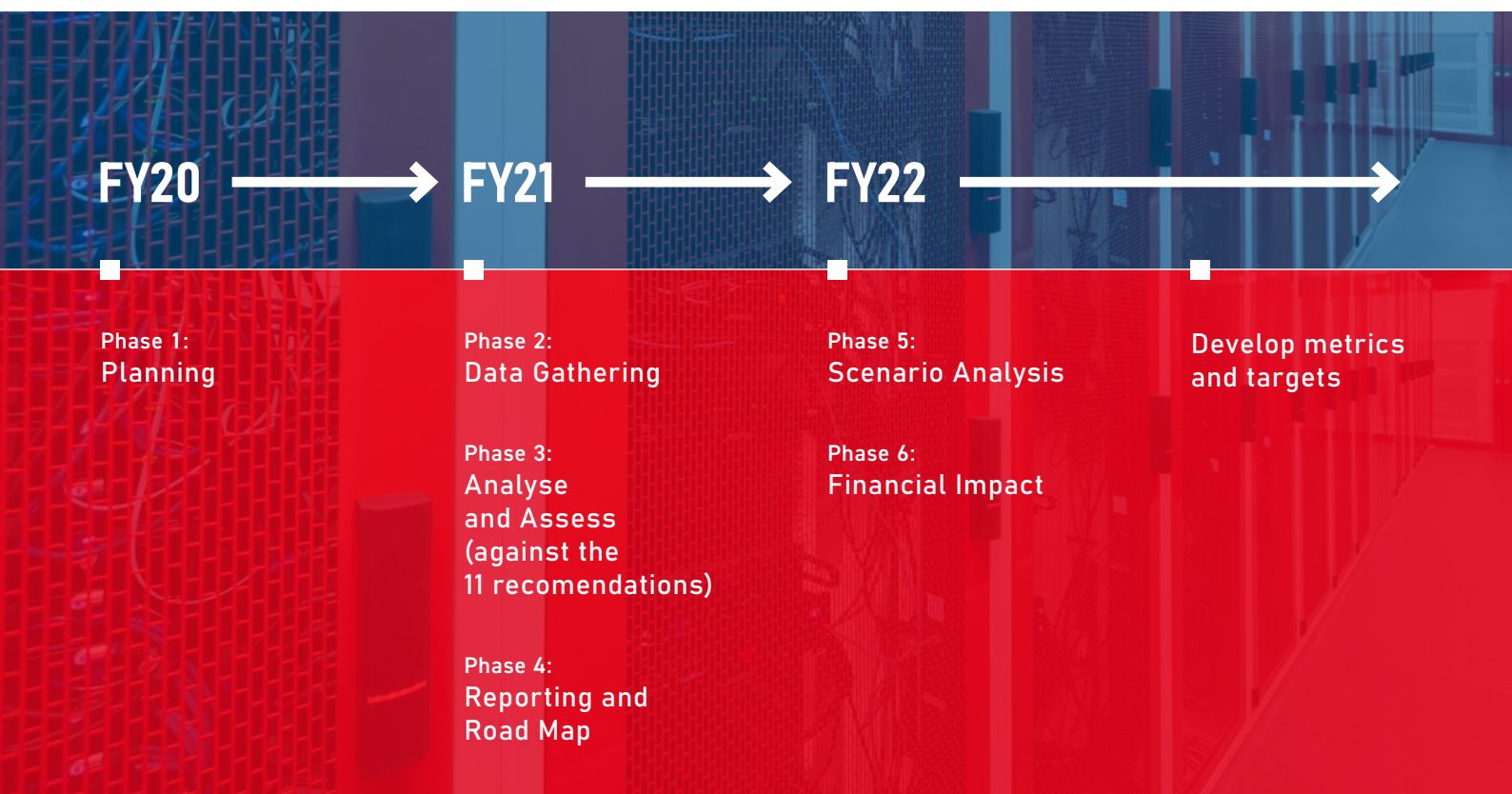
Leading the industry to be Australia's first and only NABERS 5-Star energy efficiency certified data centres has taken 10 years of commitment, not just from the design perspective, but also thorough commissioning and years of on-site analysis, modelling and tuning. To become Australia's first and only NABERS 5-Star infrastructure rated colocation data centre operator is one of NEXTDC's proudest achievements and reflects our commitment to climate change action and environmental sustainability for our children's future.”

– Jeff Van Zetten
Chief of Engineering and Design

Task Force on Climate-related Financial Disclosures (TCFD)

Our strong focus on renewables and energy efficiency, along with the achievement in making our business carbon neutral, further exemplifies our commitment to climate change action. In continuing this effort, we commit to disclosing consistent, forward-looking information on the material financial impacts of our climate-related risks and opportunities, including those related to the global transition to a lower-carbon economy. We support the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) and recognise that TCFD-aligned climate risk disclosures are of increasing interest to our investors and wider stakeholders.

We are on a journey to enhance our management and disclosure against the recommendations. We are now at the planning phase and continuing to review our operational and management practices related to climate issue management to determine the feasibility of the additional management and reporting loads required to report under such a regime (e.g. building specifications to withstand extreme weather, emission reduction management, customer reporting and carbon neutrality, etc.). In FY21, we will continue to analyse the available data and assess ourselves against the 11 recommendations of TCFD in order to establish a clear road map with the intention to move into the next phases of scenario analysis and financial impact assessment to establish meaningful metrics and targets for the Company over the subsequent years.



Environmental compliance and sanctions

NEXTDC has not received any fines or non-monetary sanctions for non-compliance with any environmental laws or regulations and is not aware of any environmental authorisation or licensing breaches. Similarly, NEXTDC has not received any fines or non-monetary sanctions in respect of any other laws.

During the reporting period NEXTDC met the following environmental compliance requirements:

- Environmental Protection Acts for each State/Territory in Australia
- Local council requirements for waste management
- Relevant dangerous goods legislation for each State/Territory regarding storage and handling of chemicals
- Relevant waste reduction/recycle legislation for each State/Territory
- Relevant control of noise legislation for each State/Territory; and
- Heritage Acts – cultural heritage obligations for each site.

As part of site selection for new data centre locations, NEXTDC also undertakes extensive due diligence, including flora and fauna studies to ensure native wildlife and vegetation are protected. Should any asbestos be found during construction, this is managed and removed by a licenced hygienist.

EXTERNAL INITIATIVES

NEXTDC participates in benchmarking assessments and maintains its memberships with key bodies. Together with our commitments, partnerships and stakeholder feedback, these assessments and memberships allow the Company to track performance against relevant standards and peers to ensure continual improvement in the way we conduct business.

ISO Standards

NEXTDC was initially certified to ISO 9001 (Quality Management System) in May 2013 and ISO 27001 Information Security Management System (ISMS) in July 2014. These certifications now apply to its Head Office, M1, M2, S1, S2, C1, P1, B1 and B2. NEXTDC's M1, S1 and C1 are certified to ISO 14001 (Environmental Management System) since August 2016. B2 was certified to ISO 14001 in May 2019, followed by P1 in May 2020.

The scope of these certifications covers the operations and maintenance of the data centres and associated services. Stakeholders involved in the development and governance of these initiatives included the senior management team, heads of departments throughout the organisation and Risk and Compliance. Besides reiterating a sound management system in these areas, these certificates meet customer expectations in the respective areas.

All NEXTDC facilities are maintained and operated in line with the ISO 45001 (Occupational Health and Safety Management Systems) requirements as part of our existing WHS Management System. NEXTDC also aims to obtain this certification for all its facilities as the next step in the assurance process.

ISO 27001:2013



Information Security Management System (ISMS) certification

(All operational sites including the Head Office)

Information Security
ISO 27001

 SAI GLOBAL

ISO 9001:2015



Quality Management Systems (QMS) certification

(All operational sites including the Head Office)

Quality
ISO 9001

 SAI GLOBAL

ISO 14001:2015



Environmental Management Systems (EMS) certification

(C1, M1, S1, B2 and P1)

Environment
ISO 14001

 SAI GLOBAL



Uptime Institute

B2 and M2 data centres are both certified as designed and constructed to the 'Tier IV Certification of Design Documents' and 'Tier IV Certification of Constructed Facility' certifications. These are the highest certifications from the Uptime Institute (UI). B2 and M2 were the first two Australian colocation data centres to achieve the Tier IV Certification for Constructed facility. Following on the success of P1 and S1 in 2018 and B2 in 2019, M2 has achieved UI Tier IV Gold Operational Sustainability certifications in FY20.

The S2 Sydney and P2 Perth data centres are both certified to 'Tier IV Certification of Design Documents' and are expected to achieve the 'Tier IV Certification of Constructed Facility' standard in FY21.



Design Documents

Tier Certification of Design Documents ratifies the functionality and capacity of the engineering and architectural facility design. Design certification ensures that the facility plans have been designed to meet uptime goals and is intended to provide the sustainable business critical infrastructure that your organisation requires.

Constructed Facility

Tier Certification of Constructed Facility ensures that your facility has been constructed as designed and verifies that it is capable of meeting the defined availability requirements.

Operational Excellence

Operational Sustainability provides Tier Certified facilities with the prioritised behaviours and risks intrinsic to data centre operations and serves as an essential guide for effective and efficient operations. Operational Sustainability verifies that practices and procedures are in place to avoid preventable errors, maintain IT functionality, and support effective site operation.

Carbon Disclosure Project (CDP)

NEXTDC participated in the 2019 climate change CDP survey which was submitted in July 2019. 2020's CDP is due for submission in August 2020. The CDP is a non-profit organisation that has established a global disclosure system that enables companies to measure their environmental impact(s). Participation in the CDP survey reflects NEXTDC's commitment to disclosing its management of climate related risks in a transparent and efficient manner.

SOCIAL SUSTAINABILITY



Human capital development

As at 30 June 2020, NEXTDC had 248 employees that were all directly employed by the Company. NEXTDC makes limited use of self-employed contractors, with no workers covered by enterprise agreements.

NEXTDC understands the value its employees bring to the Company. All NEXTDC employees received regular performance, remuneration and career development reviews during the reporting period. Each employee is encouraged to establish a Personal Development Plan with goals and training that are individually designed depending on the employee's role and individual needs. This roadmap for achieving their goal is reviewed with their manager each quarter through the 'Check-in' process. Our 'Check-in' process is the foundation of our approach to performance and development at NEXTDC. This quarterly conversation aims to effectively foster a culture of continual feedback and ensure the employee is heading in the right direction for their growth with NEXTDC.

Supporting and upskilling our team members is an essential investment in our people and our future growth. NEXTDC strongly believes that a fundamental requirement to the provision of meaningful employment is the ongoing learning and professional development of its staff and provides development opportunities to help them achieve their personal and career goals. We understand that life changes and can throw up unexpected situations – we have leave policies in place (covering areas such as parental, carers, compassionate, family and domestic violence, and volunteer day leave) and other programs to support our team members through the challenges they may face.

NEXTDC invests in developing its people through a range of learning and development activities, including external training programs and qualifications, internal training programs, workshops, online self-paced training and on the job training:

- All facility staff hold the necessary licences to carry out their duties, including cabling and electrical licences
- People managers participate in ongoing development involving external training, one-to-one coaching, internal workshops, webinars, and online resources; and
- All employees complete annual compliance training, which averages to approximately four hours per employee, per year.

In FY20, NEXTDC increased its use of casual employees across customer facing roles. We continue to focus on hiring early-in-career talent and exploring intern and graduate opportunities across the organisation where we have had the opportunity to extend permanent employment. In addition to bringing on new talent, we were also heavily invested in retaining our employees and this renewed focus resulted in a decrease in our voluntary turnover rate from 20.1% in FY19 to 14.1% in FY20.

Employee engagement

Having an engaged workforce is vital to achieving our strategic objectives. Employee feedback is requested on a regular basis, both through formal employee engagement surveys and informal

feedback requests by managers. This feedback is then used to determine the areas of focus for the business to improve the level of employee engagement across the Company.

Several initiatives have been implemented throughout FY20 to address feedback from the employee survey, drive increased employee engagement and to manage turnover. These initiatives include:

- Increased focus on mental health and wellbeing, including health checks, awareness weeks, guided meditation and access to a 3rd party providing counselling that is further elaborated in the WHS section of this report
- Delivered feedback and recognition sessions to help our people better understand our approach to remuneration at NEXTDC
- Continuous improvement of employee 'Check-in' process to foster a culture of continuous feedback and ongoing personal growth and development
- Invested in people managers and facilitated several development workshops including 'Coaching for High Performance' and 'Unconscious Bias'
- Continued focus on active listening to increase the capability of our employees to live and breathe our 'Straight Talk' value
- Unveiled quarterly 'One Team' award to recognise teams and cross-functional project groups
- Increased rigor in the recruitment process, which has improved the quality of candidates applying with improved skills and cultural fit throughout
- Invested in building our change management capability so we can successfully execute our company strategy
- Continued company 'Spotlight Series' to assist teams' company-wide to better understand different parts of the business and identify potential career opportunities
- Promoting and sharing internal career stories each quarter so our people can learn how others within the business took ownership of their development
- Created a monthly 'L&D Download,' containing recommended courses, articles, blogs and updates to enable our people to have a growth mindset
- Enabled and empowered managers to own recognition for their team – budget and guidance provided to managers in how to tailor recognition appropriately
- Developed 'The Next Way – Living the Values' workshop to ensure our values are alive at NEXTDC and not just up on our walls
- A rigorous approach to talent management to ensure we identify and tailor development for our key talent and identify clear succession plans for critical leadership roles; and
- Launched targeted pulse surveys to obtain regular feedback on how we are tracking against our objectives.

NEXTDC ensures any formal grievances raised are addressed in accordance with legislative obligations including meeting any procedural fairness requirements. NEXTDC has not received any fines or non-monetary sanctions for non-compliance with laws and regulations related to labour practices during the reporting period.



FY20's annual employee survey had an 81% engagement rate with very positive feedback in the areas of Social Connection, Diversity and Inclusion and Company Confidence which reflects the strong faith employees have in NEXTDC overall strategic direction.

Flexible working

We care deeply about ensuring each of our team members has the flexibility necessary to balance their work and life priorities. As we work together to succeed as a business, we strongly believe that providing greater flexibility will enable us to attract and retain a diverse, committed workforce, and improve well-being, engagement, productivity, and our overall effectiveness. Offering greater flexibility also empowers us to adapt to an ever-evolving workplace, especially considering the recent situations we have faced with COVID-19, where our employees have the option to continue to work from home for as long as they need to look after their health and wellbeing and that of their families. We also recognise that flexibility means different things to different people and our Flexible Working Arrangements Policy allows team members to work hours that better suit family, study and other commitments, adopt flexible patterns of work (e.g. split shifts or job sharing), consider flexible leave options, and explore opportunities to work at flexible and/or diverse locations. We have also provided the option for some of our employees to work from home on an ongoing basis, provided they can do so productively and safely.

NEXTDC's Risk and Compliance Manager, Malashini Veerappan, who works from home twice a week said:

“ A flexible working arrangement has allowed me to spend less time on the road and more time with my son while still continuing to work effectively from home. This works perfectly for my work-life balance. Thank you NEXTDC for the flexible work options!”



Employee recognition

NEXTDC believes that we need to reward the right behaviours if we want our people to flourish and drive long-term performance outcomes for the Company to achieve its objectives. Besides ensuring we have the right remuneration framework, which is elaborated on in our Remuneration Report, NEXTDC has created various opportunities to recognise its people.

Employees are recognised for living NEXTDC's values every day informally through the Yammer internal communications platform and every month through a formal awards program. Our annual conference also includes a range of awards for "A-Players", sales success and for team leadership.

Managers are given a budget throughout the financial year to recognise their people in an appropriate way whether it's for an anniversary, birthday or because the employee has gone above and beyond to achieve excellence in their role.

NEXTHERO

The 'NEXTHERO' recognition program selects a monthly winner from a short-list of candidates nominated by employees. Nominations are based on individual achievement or contribution that team members believe is exceptional. Winners of the monthly and annual awards receive gift vouchers.

NEXTDC day

Managers are empowered to recognise and reward team members for going above and beyond by rewarding them with an extra day of leave, outside of their existing employee benefits. Once awarded, the employee will have 12 months to take advantage of the reward.

'Living our values' cards

The 'values' cards are an avenue for recognising colleagues for living NEXTDC's values with a personalised message describing how much their contribution is valued. Anyone in the company is empowered to send a values card representing the value best represented by a fellow team member.

One Team Award

A new award created in response to employee feedback around wanting more recognition options for teams. Nominations are based on teams (can be cross-functional) who have worked collaboratively to deliver an exceptional outcome. Winners of this quarterly award receive a NEXTDC day.



DIVERSITY AND INCLUSION

NEXTDC is committed to providing a balanced and inclusive working environment underpinned by our Diversity Policy and initiatives which are guided by our company values. NEXTDC is in an industry sector focussed on security, construction, electrical and mechanical engineering, and IT which, in the past, have had a workforce strongly skewed towards male participation, particularly in senior roles.

Currently, 33% of NEXTDC's workforce is female with a strong representation of mature workers. There are functions in the business that reflect female participation rates at or above 50% (such as in the Legal and Compliance, Marketing, Finance and HR functions). Where possible, NEXTDC aims to shortlist female candidates during the recruitment process. Currently, our female representation target is set at 50% of applicants for all roles. The Company also demonstrates gender diversity at Board level where, for five months of the reporting cycle, two of the Board members (29%) were female. The retirement of Ms Sharon Warburton from the Board effective 1 March 2020 took the female representation ratio to one of six (17%) total Board members as at 30th June 2020. It has now returned to 29% with the appointment of Dr Eileen Doyle as at 26 August 2020. Gender diversity remains a key focus and priority for the Company at all levels.

Making things better for our employees and their families is an integral part of what we believe at NEXTDC. This includes supporting our team members who are at the start of their parenting journey. NEXTDC provides 20 weeks paid parental leave for primary caregivers and 4 weeks for secondary caregivers. Additionally, team members who have primary caregiver responsibilities for a new child may also qualify for up to 12 months unpaid parental leave. Information and resources of initiatives taken to embrace diversity and inclusion are available to all employees on our intranet.

To address the broader imbalance, NEXTDC has been active in developing and encouraging gender diversity and inclusiveness initiatives to make it a balanced and desirable workplace for all people. The FY20 annual employee survey found 85% of our employees rated our efforts on diversity and inclusion as favourable or better, identifying NEXTDC as an inclusive and respectful workplace. However, the Committee recognises that the work in this area requires ongoing action to achieve true equal participation. Our FY21 Diversity and Inclusion program has been developed to address this. NEXTDC is confident that it will remain focussed on delivering outcomes that materially shift the needle on these topics for NEXTDC's employee community and that do everything possible to encourage diverse and inclusive participation at all levels of the organisation. NEXTDC is continually developing a workplace that promotes diversity and fosters an inclusive culture that also recognises and celebrates the success of our team. Some of its key achievements in FY20 include:

- Diversity and Inclusion (D&I) Council raising awareness of D&I with employees via Town Halls, Yammer, Team meetings etc
- Launched 'NEXTWOMEN', an ongoing forum designed to support women by sharing issues and challenges they face at work, and engaged both women and men in the solution
- Conducting diversity and inclusion benchmarking against other companies to ensure we continue to mature in this space
- Celebrated days promoting inclusivity including 'R U OK' Day (mental health) and International Day for Tolerance (cultural diversity)
- Face-to-face inclusive leadership and unconscious bias training for all people managers saw participation from across the business to develop and practice constructive and inclusive behaviours in the workplace. The training also covered the potential for unconscious bias in hiring process, which has a big impact on embracing diversity
- International Women's Day celebrations conducted nationwide under the banner of 'each for equal'
- Gender pay gap review conducted to identify ways to reduce the gap in ratio of basic salary and remuneration from women to men for each of the employee categories; and
- Attracted 40% female external hires in FY20, noting the challenge in attracting female talent to Operations/Technology roles.

FY20 has seen so many great 'A-Players' join NEXTDC with 21% of vacancies filled with internal staff movement across the businesses, and 35% of external hires come through employee referrals. This is a good indication of NEXTDC's reputation in the industry and how it is perceived as an employer both internally and externally.

NEXTDC participates in the Workplace Gender Equality Annual Compliance Reporting and is compliant with the Workplace Gender Equality Act 2012 for FY20. The detailed breakdown of employees disclosed within the Company's 2020 Workplace Gender Equality report is available at www.nextdc.com.

The Company has a formal strategy in place that specifically supports and promotes gender equality and diversity. We want our female employment rate to continue to grow and are focussed on offering more initiatives that help our staff members balance work and family responsibilities, while fostering a workplace culture that embraces diversity in all forms. NEXTDC recognises the skills, values, and experiences a diversified group of people with different backgrounds can offer and is proud of its strong and diverse workforce. Overall, NEXTDC's aim is to create a fun, inclusive and interesting workplace where we invest in our team and celebrate their achievements.



Customer data security

There is a clear delineation between the data that NEXTDC holds as part of managing its business and the data that its customers hold or process as part of their operations. NEXTDC collects a minimal amount of customer Personal Identifiable Information (PII), limited to activities such as account and contact management, marketing, and to permit entry into its facilities. NEXTDC does not store, interact with or manage any data stored on its customers' equipment. Customers are responsible for managing their own data on their IT equipment and the security of their data. NEXTDC is responsible and takes pride in the best in class physical security controls to secure customers equipment in its facilities.

In any case, we recognise that a breach of data security could have a significant reputational impact on NEXTDC and its customers. Any customer related information that we store is protected by NEXTDC in accordance with our Privacy Policy, a document based on and consistent with the Australian Privacy Principles (APP) and the European Union's General Data Protection Regulation (GDPR) where applicable.

Internal data management procedures, such as the Data Retention Policy, Data Breach Notification Process, and the IT Disaster Recovery Plan supports or outlines how a privacy breach would be managed and these procedures are designed to comply with relevant legislation such as the Privacy Amendment (Notifiable Data Breaches) Bill (Commonwealth of Australia) 2016.

All NEXTDC staff as well as external contractors and consultants are required to undergo privacy management and information security awareness training annually and as part of their induction.

Our Board endorsed annual audit and assurance program is established to manage our risks while helping us measure ourselves against mandated requirements and data management best practices, such as ISO 27001, APP, ASIC Report 429 – Cyber Resilience, and the ASD Strategies to Mitigate Cyber Security Incidents. Regular updates on these topics are provided to the Executive Team and the Board to enable their oversight of the management of these risks. NEXTDC Operational Excellence (NOE), the second line of defence or internal assurance program for the various operational areas, further aligns our operational, ISO, Uptime methodologies to ensure we have a robust control framework to manage our risks whilst maintaining our Power, Secure and Connectivity brands promise.

NEXTDC's annual Disaster Recovery and Business Continuity Plan testing includes data security, to test our ability to manage breach of customer privacy information and assess the effectiveness of our data breach notification process should there be a privacy breach. NEXTDC has not received any substantiated complaints regarding breaches of customer privacy or losses of customer data during the reporting period.





WORK HEALTH AND SAFETY

Work Health and Safety (WHS) and incident is our number one priority and vital to the ultimate success of NEXTDC as an organisation. NEXTDC is committed to providing and maintaining a safe and healthy working environment for all employees, workers, customers and visitors. The Company continually strives to eliminate the potential for anything which may pose a safety risk to those who work in or visit NEXTDC premises or use NEXTDC services. The Company works diligently to identify these risks and ensure adequate controls are in place to mitigate them.

NEXTDC is committed to doing everything necessary to achieve this goal. Appropriate resources are allocated for the continuing implementation of a robust WHS Management System. The Company has a WHS Committee, which meets monthly to review WHS matters and consult with NEXTDC's employees who are represented on the Committee through a Health and Safety Representative (HSR) for each site or office. All employees and contractors are required to undergo mandatory WHS training. Task specific safety training is provided for employees and contractors based on hazards they are exposed to and equipment they use on a day-to-day basis. WHS policies and procedures are regularly reviewed and updated based on continuous improvement methodology. NEXTDC's WHS team and external auditors are engaged to conduct regular audit and safety inspections of all data centre sites to ensure we have an effective WHS control framework according to risk profiles. The Board and Senior Executives are provided with regular reports

on WHS activities and issues across the business. The Company has established a program of education, coaching, training, monitoring, and reporting to promote the safety culture and is actively engaged with industry and regulators.

NEXTDC maintained positive safety results for FY20, with the Company recording only one lost time/recordable injury, involving a NEXTDC staff who suffered a minor injury because of a trip and fall whilst on the way to work. This resulted in LTIFR and TRIFR rates of 2.5 for FY20. Though the one incident was outside of NEXTDC's control, adequate root cause analysis was performed to mitigate the risk of recurrence and in getting the Company back on track to its zero-injury target, which was achieved for 16 months prior to this incident.

The mental health of our team members continues to be a safety, health, and wellbeing priority. We aim to establish a culture where psychological safety is seen as just as important as physical safety. We have implemented programs to assist our teams and their families, including regular health checks, awareness weeks, facilitating guided meditation sessions as well as the partnership with Access EAP to provide a national Employee Assistance Program (EAP). This is available to all staff 24 hours, 7 days a week. EAP is a voluntary, confidential, and complimentary counselling service available to our employees and their immediate family. It is a short term, solution focussed approach to help enhance their overall wellbeing.

OUR GOAL IS **ZERO** INJURIES.



“
**Safety is
everyone's
responsibility**”

– Craig Scroggie, CEO

Supply chain

Sustainability is a key element of NEXTDC's supply chain management. We operate in accordance with our Supplier Code of Conduct which also aligns with our Corporate Social Responsibility Policy. NEXTDC engages with many product and service providers across its business – especially in connection with the design, build, operation, and maintenance of our facilities. All these suppliers are required to comply with this Code.

With a focus on demonstrating integrity, the Code establishes minimum requirements for corporate governance and ethical practices including WHS, social, environmental, and economic risk management, employment practices, and information security requirements.

In awarding contracts, NEXTDC prioritises suppliers that demonstrate best practice as part of the due diligence process. We have systems in place to ensure the integrity of the Code is maintained. Where appropriate, suppliers are subject to a competitive selection process which evaluates their experience, qualifications, the depth of quality assurance, demonstrable financial viability, and comprehensive insurance coverage.

Prior to any maintenance or other relevant works being undertaken at any NEXTDC facility, a risk assessment is conducted (including safety, environmental, human rights management, and information security requirements) to ensure risks are sufficiently identified and mitigated by the contractor.

We recognise that some of our suppliers need support to achieve the minimum standards we expect and acknowledge that ceasing support can have negative consequences on the suppliers' workers. Where appropriate, we continue to work with these suppliers to address non-conformances and help them step up to the required standards.

Supporting Australian industries

As a neutral hub for cloud computing, NEXTDC's facilities are purpose built to enable broad industry participation across a range of sectors. NEXTDC presently has an ecosystem of over 70 telecommunications carriers and a plurality of local and international infrastructure, platforms, applications, software, and Network-as-a-Service providers. Many of these providers are Australian companies, who in turn are powering the cloud computing revolution in Australia with their own diverse and ever evolving service offerings.

While certain materials are of a highly specialised nature and are not produced domestically, NEXTDC purchases specialised equipment and services from Australian based companies and Australian subsidiaries of international providers. These companies also undertake installation, testing, commissioning, and maintenance services within Australia and utilise Australian labour where possible as well as Australian subcontractors.

NEXTDC's Partner Program is the largest and most active in Australia, supporting an ecosystem of more than 640 vendors, telcos and providers of infrastructure, platform, and cloud services. The business invests heavily into our local SMB network to support Australian start-ups and small businesses via various partner agreements across the country. With national pride, NEXTDC is creating jobs for our country. We employ 248 staff across the country in QLD, NSW, ACT, VIC and WA, which is an increase of 6% from FY19. We are not only creating jobs in Australia; we are heavily investing into the future of ICT careers within the local market.

NEXTDC actively seeks to enhance and promote mutual research and development possibilities and strategic partnerships with its suppliers. By working with NEXTDC, many of our partners can demonstrate an enhanced proposal or solution to their customers that assists them in winning business. Our suppliers can also use their relationships with NEXTDC to demonstrate the unique skills they have gained in providing goods or services in a high-tech environment. This in turn, improves their chances of success with other businesses. An example is NEXTDC's pioneering work in Australia relating to the use of Diesel Rotary Uninterruptible Power Supplies (DRUPS) and an Isolated Parallel Bus system. These are innovations that have created significant data centre efficiencies. Suppliers involved in this project can now use their experience with NEXTDC to demonstrate the success of the technology to other customers as well as their role in the design and engineering process. As more and more domestic providers of data centres replace battery banks with DRUPS technology, this is an important and high-value example that our suppliers can use to help grow their own business capabilities.

Legal and socio-economic compliance

Due to NEXTDC's stringent sales and purchasing processes and procedures, we regard the risk of fraud and corruption as low. A Board endorsed Statement of Delegated Authority is in place to manage authority limits to prevent staff exceeding their approval limits. In addition, the disbursement of funds requires two members of the C-Suite to approve all payments.

All NEXTDC staff and Directors undergo Code of Conduct training as part of their induction with an annual refresher. The Code of Conduct is supported by NEXTDC's extensive framework of policies and standards including the Work Health and Safety Policy, Procurement Policy, Diversity Policy, Anti-Bribery and Corruption Policy, Human Rights Policy, Securities Trading and Continuous Disclosure and Market Communications Policies and the Whistleblower Policy and procedure, which encourages them to come forward if they witness untoward behaviour.

There have been no identified instances of fraud since the Company was founded.

Protecting Human Rights

NEXTDC values human rights for all people including employees, the communities we operate in, our business partners, and those working within our supply chains. We are committed to reducing instances of human rights violations and risks within our supply chain.

NEXTDC conducts its business in a manner consistent with practises outlined by the United Nations Guiding Principles on Business and Human Rights. NEXTDC's supplier assurance program specifically addresses compliance with the Modern Slavery Act 2018 (Cth.) which requires us to report on and action any risks of modern slavery identified in our operations and supply chains.

We have undertaken a comprehensive risk assessment of our supply chain and are currently implementing relevant policies to promote increased awareness amongst our staff and our suppliers about the existence of modern slavery. We will be publishing our Modern Slavery Statement based on United Nations guidelines before December 2020 which will outline actions NEXTDC is undertaking to eliminate risks of modern slavery in our supply chains.

COMMUNITY INVOLVEMENT



NEXTDC is committed to giving back. The Company supports a range of charities by holding internal fundraising events and encouraging volunteering throughout the year. Through NEXTDC's Corporate Social Responsibility program, 'Live to Give,' the Company supports various charities and the community. A key partnership has been established with The Smith Family and NEXTDC is proud to sponsor their 'Learning for Life' program which supports disadvantaged students to receive the extra support they need to stay in school and go on to further studies.

NEXTDC has continued to take the 1% pledge and committed to a program where all employees are empowered to spend 1% of

their time giving back to the community. To enable employees to fulfil their pledge, everyone has access to and is encouraged to take 'Volunteer Days' to support causes of personal significance. NEXTDC's Workplace Giving Program allows employees to donate directly from their pre-tax salary to The Smith Family, Cancer Council, Beyond Blue or UN Women. To embed the ethos of giving back yet further, NEXTDC matches employee contributions, dollar for dollar.

In light of the bushfire this year, each NEXTDC site was allocated a sum of which was donated to their chosen fund. A number of employees used their volunteer days to provide emergency support in their localities.



SUSTAINABILITY DATA



NEXTDC's sustainability data provided below relates to the financial year ending 30 June 2020 and is presented to the nearest significant figure.

Environmental indicators

Environmental Indicators	Target	FY20	FY19	FY18	FY17
Average Power Usage Effectiveness (PUE) [^]	1.40*	1.30	1.30	1.34	1.36
NEXTDC's Scope 1 emissions		8	8	16	5
NEXTDC's customers Scope 1 emissions		426	387	781	215
Total Scope 1 emissions (tCO ₂ e)	N/A ^{^^}	434	395	797	220
NEXTDC's Scope 2 emissions		4,479	3,958	4,066	3,554
NEXTDC's customers Scope 2 emissions		219,629	194,068	199,276	155,088
Total Scope 2 emissions (tCO ₂ e)	N/A ^{^^}	224,108	198,026	203,342	158,642
Total water consumption (kL)**	N/A***	346ML	216ML	303ML	175ML

Notes:

[^] Average is measured across all data centres over a full year

* Target has been set based on all data centres being fully built and operational, and operating at target customer load

^{^^} There are no targets for reducing Scope 1 or Scope 2 emissions as they will reflect customer growth; rather this is managed through PUE

** Total water drawn from water grids and rain consumption from all data centres over a full year

*** There are no targets for total water consumption as this will reflect organisation/customer growth. NEXTDC has started tracking its WUE and will be setting a target in the near future

NEXTDC people

	30 Jun 20	30 Jun 19	30 Jun 18	30 Jun 17	30 Jun 16
Total Headcount*	248	233	202	165	170
BY DIVISION					
Corporate (Executive, Finance, Legal, People and Culture and Sales)	67	66	57	53	55
Facility Operations, Project Management, and Engineering	68	63	50	42	50
Technology, Customer Operations and Marketing	113	104	95	65	65
Turnover Rates [^]	14.1%	20.1%	19.9%	14.0%	18.5%

Notes:

* Headcount: The number of employees as at the end of the reporting period (includes part-time employees)

[^] Turnover rates: The average regretted voluntary turnover rate for the reporting period

Workforce by location, type and gender

	Managers		Non-Managers		Totals (actuals)
	M	F	M	F	
Melbourne	9	0	31	17	57
Sydney	11	2	40	19	72
Brisbane	8	4	37	30	79
Canberra	3	0	10	0	13
Perth	1	2	15	7	25
Singapore	1	0	0	0	1
Tokyo	1	0	0	0	1
Totals (actuals)	34	8	133	73	248

Workforce – New hires by gender, location and age group

	20-30		31-40		41-50		51-60	
	M	F	M	F	M	F	M	F
Melbourne	4	2	3	1	1	1	3	0
Sydney	4	3	4	3	1	3	1	0
Brisbane	3	2	2	2	0	0	0	0
Canberra	0	0	1	0	0	0	2	0
Perth	3	4	0	1	0	0	2	0
Singapore	0	0	0	0	0	0	0	0
Tokyo	0	0	0	0	0	0	1	0
Totals	14	11	10	7	2	4	9	0

GRI CONTENT INDEX

GRI Standard	Disclosure	Page	Omission
GRI 102: General Disclosures 2016	General Disclosures		
	102-1 Name of the organisation	10	N/A
	102-2 Activities, brands, products, and services	Annual Report	N/A
	102-3 Location of headquarters	10	N/A
	102-4 Location of operations	10	N/A
	102-5 Ownership and legal form	10	N/A
	102-6 Markets served	Annual Report	N/A
	102-7 Scale of the organisation	Annual Report	N/A
	102-8 Information on employees and other workers	37	N/A
	102-9 Supply chain	33	N/A
	102-10 Significant changes to the organisation and its supply chain	Not Applicable	No significant changes during the reporting period
	102-11 Precautionary Principle or approach	10	N/A
	102-12 External initiatives	Annual Report	N/A
	102-13 Membership of associations	14	N/A
	102-14 Statement from senior decision maker	3	N/A
	102-16 Values, principles, standards, and norms of behaviour	10	N/A
	102-18 Governance structure	Company's FY20 Corporate Governance Statement	N/A
	102-40 List of stakeholder groups	14	N/A
	102-41 Collective bargaining agreements	24	N/A
	102-42 Identifying and selecting stakeholders	14	N/A
	102-43 Approach to stakeholder engagement	14	N/A
	102-44 Key topics and concerns raised	15	N/A
	102-45 Entities included in the consolidated financial statements	Annual Report	N/A
	102-46 Defining report content and topic boundaries	7	N/A
	102-47 List of material topics	15	N/A

GRI Standard	Disclosure	Page	Omission
GRI 102: General Disclosures 2016	102-48 Restatements of information	Not applicable	No information restatements made during the reporting period
	102-49 Changes in reporting	7	N/A
	102-50 Reporting period	7	N/A
	102-51 Date of most recent report	7	N/A
	102-52 Reporting cycle	7	N/A
	102-53 Contact point for questions regarding the report	43	N/A
	102-54 Claims of reporting in accordance with the GRI Standards	7	N/A
	102-55 GRI content index	39	N/A
	102-56 External assurance	23	N/A
Material Topics			
1. Energy			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its boundaries	15	N/A
	103-2 The management approach and its components	17	N/A
GRI 302: Energy	302-1 Energy consumption within the organisation	17	N/A
2. Emissions			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its boundaries	15	N/A
	103-2 The management approach and its components	19	N/A
GRI 305: Emissions	305-1 Direct (Scope 1) GHG emissions	37	N/A
	305-2 Energy indirect (Scope 2) GHG emissions	37	N/A
3. Environmental Compliance			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its boundaries	15	N/A
	103-2 The management approach and its components	17	N/A
GRI 307: Environmental Compliance	307-1 Non-compliance with environmental laws and regulations	22	N/A

GRI Standard	Disclosure	Page	Omission
4. Supplier Environmental Assessment			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its boundaries	15	N/A
	103-2 The management approach and its components	33	N/A
GRI 308: Supplier Environmental Assessment	308-1 New suppliers that were screened using environmental criteria	33	N/A
5. Occupational Health and Safety			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its boundaries	15	N/A
	103-2 The management approach and its components	32	N/A
GRI 403: Occupational Health and Safety	403-1 Occupational health and safety management system	32	N/A
	403-8 Workers covered by an occupational health and safety management system		
6. Employee Retention and Loss of Talent			
GRI 103: Management Approach	103-1 Explanation of the material topic and its boundaries	15	N/A
	103-2 The management approach and its components	26	N/A
GRI 404: Training and Education	404-1 Average hours of training per year per employee	26	N/A
	404-2 Programs for upgrading employee skills and transition assistance programs		
	404-3 Percentage of employees receiving regular performance and career development reviews	26	N/A
GRI 405: Diversity and Equal Opportunity	405-1 Diversity of governance bodies and employees	29	N/A
7. Breach of Privacy Information			
GRI 103: Management Approach	103-1 Explanation of the material topic and its boundaries	15	N/A
	103-2 The management approach and its components	30	N/A
GRI 418: Customer Privacy	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	30	N/A
8. Social Impact of the Business			
GRI 103: Management Approach	103-1 Explanation of the material topic and its boundaries	15	N/A
	103-2 The management approach and its components	33	N/A
GRI 419: Socioeconomic Compliance	419-1 Non-compliance with laws and regulations in the social and economic area	33	N/A

GRI Standard	Disclosure	Page	Omission
9. Legal Compliance			
GRI 103: Management Approach	103-1 Explanation of the material topic and its boundaries	15	N/A
	103-2 The management approach and its components	33	N/A
GRI 205: Anti-corruption	205-2 Communication and training about anti-corruption policies and procedures	33	N/A
	205-3 Confirmed incidents of corruption and actions taken	33	N/A
GRI 206: Anti-competitive behaviour	206-1 Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	33	N/A



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where the cloud lives™

1 July 2019 to 30 June 2020
NEXTDC Limited
ABN 35 143 582 521

For any queries about NEXTDC's
sustainability reporting, please use the
following link to contact us.