

Asia Pacific Data Centre Group

DIVERSITY POLICY

1. Policy Statement

- 1.1 Asia Pacific Data Centre Group's (**APDC Group**) anticipates that its workforce will comprise many individuals with diverse skills, values, experiences, backgrounds and attributes including those gained on account of their gender, age, ethnicity and cultural background.
- 1.2 The APDC Group values and is proud of its strong and diverse workforce and is committed to supporting and further developing this diversity through attracting, recruiting, engaging and retaining diverse talent and aligning the APDC Group's culture and management systems with this commitment.
- 1.3 The APDC Group believes that such a commitment to diversity creates competitive advantage and enhances employee participation, and in this way is essential to the organisation continuing to succeed and grow strong.

2. Key Strategies

- 2.1 The APDC Group is committed to providing and promoting a corporate culture which embraces diversity in line with the Diversity Policy Statement set out above, and aims to do so by:
- (a) promoting the principles of merit and fairness when making decisions about recruitment, development, promotion, remuneration and flexible work arrangements;
 - (b) having an overall transparent process for the review and appointment of senior management positions and Board members;
 - (c) recruiting from a diverse pool of qualified candidates, engaging where practical a professional search / recruitment firm, advertising vacancies widely, making efforts to identify prospective employees who have diversity attributes and ensuring diversity of members on the selection / interview panel when selecting and appointing new employees (including senior management) and new Board members;
 - (d) embedding the importance of diversity within the APDC Group's culture by encouraging and fostering a commitment to diversity by leaders at all levels whilst recognising that diversity is the responsibility of all employees;
 - (e) recognising that employees may have domestic responsibilities; and
 - (f) continuing to review and develop policies and procedures to ensure diversity within the organisation.

3. Key Initiatives and Programs

- 3.1 The APDC Group also aims to introduce and / or maintain the following programs and initiatives to assist with improving diversity within the organisation:
- (a) mentoring programs;
 - (b) career opportunity and targeted professional development programs including those aimed at helping employees develop skills and experience in preparation for senior management and board positions;
 - (c) work life balance policies including flexible work options, in-house childcare facilities, return to work programs and the like; and
 - (d) networking opportunities.

4. Measurable Objectives, Targets and KPIs for Gender Diversity

- 4.1 The APDC Group will set and implement measurable objectives, targets and / or key performance indicators (**KPIs**) to achieve gender diversity. The setting of objectives and targets will occur at such time when there are or anticipated to be more than 10 employees of the Group.
- 4.2 Management will develop, for approval by the Board or its relevant sub-committee, as appropriate:
- (a) the measurable objectives to achieve gender diversity; and
 - (b) the targets and / or KPIs to verify progress towards attainment of those measurable objectives.
- 4.3 Management will also at least annually, assess the measurable objectives against those targets and KPIs.
- 4.4 At least annually, Management will monitor, review and report to the Board on the achievement of these matters, gender diversity and the APDC Group's progress under this Policy more broadly.

5. Communication

- 5.1 In order to promote transparency and accountability and to further the objectives of this Policy the APDC Group will:
- (a) post a copy of this Policy or a summary of it on the APDC Group's website; and
 - (b) disclose a copy of this Policy or a summary of it in the APDC Group's annual report.

6. Compliance Requirements

- 6.1 The APDC Group is committed to meeting its obligations with respect to "Diversity" under the ASX Corporate Governance Principles and Recommendations (3rd Edition) (**ASX Recommendations**) and any other applicable regulatory requirements, including by:
- (a) establishing this Policy (pursuant to ASX Recommendation 1.5(a));
 - (b) establishing measurable objectives for achieving gender diversity (pursuant to ASX Recommendation 1.5(a));
 - (c) the Board annually assessing the measurable objectives and the APDC Group's progress in achieving them (pursuant to ASX Recommendation 1.5(a));
 - (d) disclosing this policy or a summary of it on the APDC Group's website and in its annual report (pursuant to ASX Recommendations 1.5(b));
 - (e) disclosing the measurable objectives and progress in achieving them in its annual report (pursuant to ASX Recommendation 1.5(c));
 - (f) disclosing the respective proportions of men and women across the APDC Group, in senior executive positions and on the Board in the corporate governance statement (pursuant to ASX Recommendation 1.5(c)(1)); and
 - (g) disclosing a board skills matrix setting out the skills and diversity that the Board currently has or is looking to achieve in its membership (pursuant to ASX Recommendation 2.2).
- 6.2 The Company Secretary is responsible for ensuring that the APDC Group meets its compliance and reporting obligations referred to above.

7. Responsibilities

- 7.1 The Board is ultimately accountable for this Policy.
- 7.2 The Chief Executive Officer and members of senior management are responsible for the implementation of this Policy and monitoring compliance with it, with the Company Secretary being responsible for the administration of the Policy (including in relation to reporting to the Board, or its relevant sub-committee as appropriate).

8. Overriding Caveat

- 8.1 Nothing in this Policy shall be taken, interpreted or construed so as to endorse:
- (a) the principal criteria for selection and promotion of people to work within the APDC Group being other than their overall relative prospect of adding value to the APDC Group and enhancing the probability of achievement of the APDC Group's objectives;
 - (b) any discriminatory behaviour by or within the APDC Group contrary to the law, or any applicable codes of conduct or behaviour for the APDC Group and its personnel; and
 - (c) any existing person within the APDC Group being prejudiced by this Policy in their career development or otherwise, merely because their diversity attributes at any time may be more, rather than less, common with others.

9. Review of this Policy

- 9.1 This Policy will be reviewed regularly by the Chief Executive Officer.
- 9.2 A report will be made to the Board of Directors of the outcome of any such review and recommended changes to the Policy. The review must address generally the efficacy of the Policy. In particular, it must consider the fairness of investigations undertaken, the actual consequences for persons who report concerns and compliance with the Policy generally.
- 9.3 The Board may discontinue or amend any part or the whole of this Policy from time to time at its absolute discretion.

10. Further Information

- 10.1 If you have any questions regarding this Policy you should contact:

Address: Company Secretary
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Sydney NSW 2000

Telephone: 02 8973 7493

Email: info@asiapacificdc.com

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