



5 September 2024

Ms Ramona Seeto  
ASX Listing Adviser, Listings Compliance  
20 Bridge Street  
Sydney NSW 2000

Dear Ms Seeto

**NEXTDC Limited (NXT): Price Query**

NEXTDC Limited (NXT or the Company) refers to your letter of today and provides the following responses:

- 1) **Is NXT aware of any information concerning it that has not been announced to the market which, if known by some in the market, could explain the recent trading activities?**

No.

- 2) **If the answer to 1. Is 'yes':**
  - (a) **Is NXT relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1?**
  - (b) **Can an announcement be made immediately**
  - (c) **If an announcement cannot be made immediately, why not and when is it expected that an announcement will be made?**

Not applicable

- 3) **If the answer to 1) is 'No', is there any other explanation that NXT may have for the recent trading in its securities?**

NEXTDC Limited | ACN 143 582 521 [info@nextdc.com](mailto:info@nextdc.com)  
[www.nextdc.com](http://www.nextdc.com)

20 Wharf St. Brisbane QLD 4000 | GPO Box 3219. Brisbane

For personal use only

The Company understands that it has been included in the NAREIT Real Estate Index - Quarterly Review 2024, released in the United States, overnight Australian time. In addition, it notes there has been significant recent activities in the data centre sector.

- 4) Please confirm that NXT is complying with its Listing Rules and, in particular, Listing Rule 3.1.**

Confirmed

- 5) Please confirm that NXT's response to the question above have been authorized and approved under its publishes continuous disclosure policy or otherwise by its Board or an officer of NXT with delegated authority from the Board to respond to the ASX on disclosure matters.**

Confirmed.

Please do not hesitate to contact me should you wish to discuss further

Yours sincerely



Michael Helmer  
Company Secretary  
**NEXTDC Limited**



5 September 2024

Reference: 99529

Mr Michael Helmer  
Chief Legal Officer and Company Secretary  
NEXTDC Limited

Dear Mr Helmer

### **NEXTDC Limited ('NXT'): Price – Query**

ASX refers to the following:

- A. The change in the price of NXT's securities from a closing price of \$16.07 on 4 September 2024 to an intraday high of \$18.14 at the time of writing today, 5 September 2024.
- B. The significant increase in the volume of NXT's securities traded over this period.

### **Request for information**

In light of this, ASX asks NXT to respond separately to each of the following questions and requests for information:

1. Is NXT aware of any information concerning it that has not been announced to the market which, if known by some in the market, could explain the recent trading in its securities?
2. If the answer to question 1 is "yes".
  - (a) Is NXT relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in NXT's securities would suggest to ASX that such information may have ceased to be confidential and therefore NXT may no longer be able to rely on Listing Rule 3.1A. Accordingly, if the answer to this question is "yes", you need to contact us immediately to discuss the situation.
  - (b) Can an announcement be made immediately? Please note, if the answer to this question is "no", you need to contact us immediately to discuss requesting a trading halt (see below).
  - (c) If an announcement cannot be made immediately, why not and when is it expected that an announcement will be made?
3. If the answer to question 1 is "no", is there any other explanation that NXT may have for the recent trading in its securities?
4. Please confirm that NXT is complying with the Listing Rules and, in particular, Listing Rule 3.1.
5. Please confirm that NXT's responses to the questions above have been authorised and approved under its published continuous disclosure policy or otherwise by its board or an officer of NXT with delegated authority from the board to respond to ASX on disclosure matters.

### **When and where to send your response**

This request is made under Listing Rule 18.7. Your response is required as soon as reasonably possible and, in any event, by no later than **1:00 PM AEST Thursday, 5 September 2024**. You should note that if the information requested by this letter is information required to be given to ASX under Listing Rule 3.1 and it does not fall within the exceptions mentioned in Listing Rule 3.1A, NXT's obligation is to disclose the

---

information 'immediately'. This may require the information to be disclosed before the deadline set out in the previous paragraph and may require NXT to request a trading halt immediately.

Your response should be sent by e-mail at **ListingsComplianceSydney@asx.com.au**. It should not be sent directly to the ASX Market Announcements Office. This is to allow me to review your response to confirm that it is in a form appropriate for release to the market, before it is published on the ASX Market Announcements Platform.

### **Trading halt**

If you are unable to respond to this letter by the time specified above, or if the answer to question 1 is "yes" and an announcement cannot be made immediately, you should discuss with us whether it is appropriate to request a trading halt in NXT's securities under Listing Rule 17.1. If you wish a trading halt, you must tell us:

- the reasons for the trading halt;
- how long you want the trading halt to last;
- the event you expect to happen that will end the trading halt;
- that you are not aware of any reason why the trading halt should not be granted; and
- any other information necessary to inform the market about the trading halt, or that we ask for.

We require the request for a trading halt to be in writing. The trading halt cannot extend past the commencement of normal trading on the second day after the day on which it is granted. You can find further information about trading halts in Guidance Note 16 *Trading Halts & Voluntary Suspensions*.

### **Suspension**

If you are unable to respond to this letter by the time specified above, ASX will likely suspend trading in NXT's securities under Listing Rule 17.3.

### **Listing Rules 3.1 and 3.1A**

In responding to this letter, you should have regard to NXT's obligations under Listing Rules 3.1 and 3.1A and also to Guidance Note 8 *Continuous Disclosure*: Listing Rules 3.1 – 3.1B. It should be noted that NXT's obligation to disclose information under Listing Rule 3.1 is not confined to, nor is it necessarily satisfied by, answering the questions set out in this letter.

### **Release of correspondence between ASX and entity**

We reserve the right to release a copy of this letter, your reply and any other related correspondence between us to the market under Listing Rule 18.7A.

### **Questions**

If you have any questions in relation to the above, please do not hesitate to contact me.

Yours sincerely

---

**ASX Compliance**