PORTUS DATA CENTERS

Environmental, Social and Governance (ESG)

Policy

Table of Contents

1   Purpose

The Board of Portus Data Centers (the "Group" or "Portus") recognizes that environmental, social and governance ("ESG") issues play an increasingly important role in today's environment, have a material effect on the performance of the Group companies and that acting in a sustainable manner at all times is the right thing to do. The aim of this policy is to ensure that ESG issues are considered at all levels of the Group's business activities, and in accordance with International and National Codes and Principles.

Specifically, Portus aims to achieve this by:

- Ensuring that our vision and ESG objectives are relevant, understood and communicated and that our employees demonstrate alignment to them
- Identifying all material ESG risks in the business activities undertaken by Portus companies and ensuring that the risks are fully considered and managed in a responsible and ethical way
- Ensuring that key decisions are only taken after full consideration of all material ESG issues and risks
- Including ESG as an agenda item for all Group company Board meetings and establishing standardised Board reporting to monitor incidents and their impacts
- Identifying an individual at each of the Group companies who is responsible for ESG matters
- Setting targets for environmental, social and governance matters which will be reported, monitored, reviewed and disclosed to our employees and shareholders
- Providing appropriate information, instruction and training and ensuring that this policy is communicated to all persons working for Portus companies
- Working together with our customers, suppliers and business partners to encourage them to adopt the principles or similar policies with the same outcomes
- Aspiring to achieve benchmark levels in environmental, social and governance performance and making these themes core to what we do

Environment

- Committing to the protection of the environment through continuously reducing the environmental footprint of the Group companies
- Encouraging Group companies to actively explore initiatives to improve their energy efficiency within their facilities by using energy-efficient mechanical and engineering equipment, optimising water usage and, where applicable and required

- Mandating that all Group Companies use biofuel (e.g. hydrotreated vegetable oil) where technically possible and reasonable to do so
- Mandating that all Group Companies procure electricity that is sourced from renewables and certified as same
- Encouraging Group companies' transport operations to utilise fuel-efficient vehicles and trailers, and to explore alternative renewable energy procurement (e.g. via PPAs, and/o private wire arrangements with renewable energy producers) where practical and economic to do so
- Encouraging all staff to consider the environmental consequences of their actions and to seek to minimise the impact where reasonably practicable
- Consideration and monitoring of key environmental metrics material to the Group companies, including energy usage, energy efficiency (i.e. PUE), water usage, water efficiency (i.e WUE), greenhouse gas emissions, and waste (especially from any construction activities)
- Through monitoring of greenhouse gas emissions and exploring decarbonization opportunities, Portus targets to achieve net zero emissions by 2050
- For new developments actively consider and design for use of waste heat
- Adopting relevant international environmental standards
- Comply with all applicable biodiversity laws, regulations, and contractual obligations and policies
- Contribute to the United Nations Sustainable Development Goals, and evaluate which of these are most applicable for Portus

Social

- Encouraging a culture of diversity with the highest ethical standards, respect human rights, promote equality of all kinds and act against incidents and grievances in a systematic and fair manner, through contribution towards SDG 5 Gender Equality and SDG 10 Reduced Inequalities
- Supporting a culture in which all employees are valued and respected, with regular employee engagement to collect feedback
- Promoting the Group's commitment to the wider society and community development as well as local employment
- Ensuring that Group companies' services contribute to the goal of reduction of global emissions while providing essential services to house mission critical IT and communications infrastructure

- Ensuring appropriate and timely stakeholder engagement, in line with the Group's stakeholder engagement policy and strategy
- Supporting local and international initiatives, with the goal of making a positive contribution to our local communities, and to organisations relevant to our business
- Providing adequate control of health and safety risks in order to prevent any incidents occurring in the workplace or through any of the Group's operations for our employees, contractors, supply chain and users – especially so when any construction or maintenance activities are performed within data centre facilities.
- Providing appropriate training, underpinned by defined procedures and support systems
- Providing appropriate PPE and procedures when dealing with mechanical or engineering equipment
- Ensuring that contractors meet safety and certification standards to conduct maintenance, construction or operating activities at or around data centre facilities, as required by law, regulations or industry standards
- Reporting on H&S incidents regularly through board reporting, promoting a continuous improvement philosophy with a zero accidents ambition

Governance

- Ensuring compliance with regulations and guiding principles governing the protection of human rights, operational and occupational health and safety, environmental and business practices in the jurisdictions in which we operate
- Identifying the relevant legislative and regulatory requirements and ensuring that the colocation facilities are compliant with these requirements, and where practicable, meeting them in an environmentally responsible manner
- Ensuring appropriate mitigation measures and procurement of relevant IT software to minimise the risk and impact of cyber security breaches
- Adopting appropriate measures and guidelines to prevent the incident of fraud and ensure data protection and privacy
- Ensuring availability of whistleblower and grievance processes throughout the organisation where required
- Adopting the highest standards of governance and ethics of business conduct and practice
- Ensuring the Board of Directors have oversight of all material business activities (including ESG matters and key decisions) through Company Board meetings where ESG will be an agenda item

2 Reporting, Disclosure and Communications

Environmental, Social and Governance risks and opportunities are addressed periodically at Group company Board meetings. The Group companies shall monitor and report key ESG metrics. These metrics include personal injuries and fatalities, operational incidents, energy consumption/generation, GHG emissions, water consumption, other board-level or operational issues, and any other metric request by the respective Group company Board.

ESG Reporting Matrix

The below matrix provides guidance to the Group companies on the approach to classification of ESG incidents. Serious incidents, injuries and fatalities (i.e. level 3 or above) are reported to board members as soon as they occur and become known.

Type of Impact	Impact				
	1 = Very Low	2 = Low	3 = Medium	4 = High	5 = Very High
Financial	< € 50k	€ 50k < € 100k	€ 100k < € 250k	€ 250k < € 500k	> €500k
Personal Injury	First aid treatment	Medical treatment required	Extensive injuries	Loss of livelihood	Death
Operational	Minor operational incident, no client impact	Minor operational incident with client impact	Incident causing temporary disruption to facility or client operations	Incident causing prolonged disruption to facility or client operations	Incident causing shut-down of facility or material disruption to client operators
Compliance	Minor breaches by individual staff members	No fine, but some disruption to services	Fine with some disruption to services	Fine and significant disruption to services	Fine and extreme disruption to services with the potential to lead to collapse of the business
Reputational	Negative coverage in local/state/social media	Series of negative coverage in local/state/social media	Extensive negative local/state/social media coverage	Extensive negative nationwide media / widespread social media coverage	Extensive extremely negative nationwide or international media coverage / viral social media coverage
Environmental	Environmental exposure immediately contained	Environmental exposure contained with active management over a short period of time	Environmental exposure contained with active management and outside assistance over a short period of time	Significant environmental exposure contained with active management and outside assistance over an extended period of time	Critical environmental exposure with significant detrimental effects

Personal Injury Reporting

At each Board meeting, a designated Group company employee shall present a report on the incidence and severity of employee or sub-contractor injury occurring on company property or at the fault of the company. The report should include statistics on the number of injury incidents, the severity of those incidents (as per the guidelines above) and the number of lost work days as a result of the incidents. Statistics shall be presented for the year to date of the current year and compared with the equivalent period in the prior reporting year.

The personal injury statistics should be presented to the Board in a standardised format across the Portus Group companies in line with the below example.

Impact	Injury Incidents				Lost Work Days			
	Q1 2023	Q1 2022	YTD 2023	YTD 2022	Q1 2023	Q1 2012	YTD 2023	YTD 2022
1 = Very Low								
2 = Low								
3 = Medium								
4 = High								
5 = Very High								

In addition, at each Board meeting, the Group companies shall present their "Accident Frequency Rate" for the current financial year. The Accident Frequency Rate shall be calculated by dividing the number of injury incidents with lost time by the total number of worked hours and multiplying the resultant figure by 1,000,000.

Accident Frequency Rate	Q1 2023	Q1 2022	YTD 2023	YTD 2022

Operational, Compliance, Reputational Incident Reporting

At each Board meeting, a designated Group company employee shall present a report on the incidence and severity of operational, compliance and reputational incidents at the company and the financial impact of such incidents. Statistics shall be presented for the current financial period and compared with the equivalent period in the prior reporting year.

The operational, compliance and reputational incident report should be presented in a standardised format across the Group companies in line with the below example.

Impact	Incidents		Total Financial Impact	
	YTD 2023	YTD 2022	YTD 2023	YTD 2022
1 = Very Low				
2 = Low				

3 = Medium				
4 = High				
5 = Very High				

<u>Environmental Reporting</u>

At each Board meeting, a designated Group company employee shall present a report containing statistics on a number of measures to indicate the company's impact on, or positive contribution to, its local environment.

To the extent that these statistics are not readily available, the Group companies shall attempt to implement the necessary processes and procedures for this information to be obtained as soon as reasonably practicable.

The environmental report should be presented in a standardized format across the Group companies in line with the below example.

Measure	Q1 2023	Q1 2022	YTD 2023	YTD 2022
Energy Consumption (Mwh)				
Water usage (litres)				
Biofuel/fuel consumed (litres)				
GHG emissions (kg)				
Waste generation (tonnes)				

3 Training

Annual ESG training is completed by those within the organisation who are responsible for and have oversight of ESG as part of their role. The Group companies will monitor and track the number of FTE employees who have undergone training during the year and the total annual expenditure on training for its employees.

Direction and oversight of the Environmental, Social and Governance Policy is the responsibility of the Portus Board which has delegated day-to-day management responsibility to the respective CEO's of the Group companies.

This Policy applies to all Portus Group companies. This Policy will be reviewed annually.