

Environment, Health and Safety (EHS) Policy

Policy Statement

DataBank Holdings Ltd. and its affiliates (“DataBank”) are committed to providing world-class data center services while operating in ways that protect people, the environment, our facilities, and the communities in which we operate. To meet these commitments and bolster long-term success, DataBank has established policies and programs that support safety, environmental protection, and compliance.

Health and Safety

DataBank is committed to providing a safe, healthy, and secure work environment that is free of occupational injury and illness. To meet this commitment, we assess hazards and design programs to eliminate or mitigate risk; design safety programs that include written procedures, general and job specific training, and emergency response; comply with local, state, and federal regulations; and integrate health and safety aspects into project planning and implementation.

Environment

DataBank is committed to preventing pollution, conserving natural resources, optimizing energy and water usage, preserving water quality, reducing noise and light pollution, protecting sensitive habitats and biodiversity, and reducing environmental impacts throughout the lifecycle of our facilities. We support the company’s goal of net zero scope 1 and 2 carbon emissions by 2030, as detailed in the DataBank Climate Policy. To meet these commitments, we systematically manage energy consumption, water and materials usage, and waste; implement monitoring systems to track environmental metrics; train our employees to respond quickly and safely to unexpected deviations and events; and comply with local, state, and federal regulations.

EHS Management System (EHS MS)

Our EHS MS provides the procedures, resources and training needed to implement this policy. The EHS MS promotes transparent communication, our leadership team supports its integration into business processes, and we review it regularly to ensure its continued relevance to our organization’s purpose and strategic direction. Our EHS MS is designed to align with ISO 14001:2015 Environmental Management Systems and ISO 45001:2018 Occupational Health and Safety Management Systems, further demonstrating our dedication to occupational health and safety and environmental protection.

Employee Responsibilities

All DataBank employees have EHS responsibilities. DataBank leadership provides EHS program resources, supports policy implementation, reviews EHS performance regularly, supports continuous improvement, and maintains open communication. Employees are expected to follow all EHS procedures, report hazards and incidents promptly, participate in training programs, suggest improvements, and support policy implementation. The EHS team writes policies and procedures; collaborates with facilities, operations, and construction to implement them; evaluates performance through on-site reviews and third-party assessments; and uses data from those assessments and other feedback mechanisms to continually improve EHS policies, programs, and procedures.

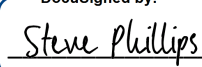
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This EHS policy is endorsed by the executive team, supported by the Board of Directors, maintained by the Director of EHS, and available to all stakeholders. All personnel, including employees, customers, data center visitors, and suppliers are expected to follow this policy.

Approval

The Vice President of Human Resources hereby approves this policy:

DocuSigned by:


Signed

February 12, 2025

Date

Further Information

Additional information on DataBank's EHS practices can be found on our website.

To Report an EHS Emergency, Incident or Concern

Life-threatening emergencies: Call 911 or your local police, fire, or other emergency responders first. Then, alert DataBank site security.

Non-life-threatening EHS incidents: Submit a report within 24 hours through DataBank's Internal Incident Reporting Tool or to EHS@ databank.com.

EHS ethics concerns: Reach out to Vice President of Human Resources, General Counsel, Director of EHS, or DataBank's anonymous Ethics Hotline:

- www.databank.ethicspoint.com
- www.databankmobile.ethicspoint.com
- U.S. Toll-Free: 844-979-4929
- UK Toll-Free: Dial 0-800-89-0011, then dial 844-979-4929

Other EHS concerns: Contact a supervisor or EHS, Legal, or Human Resources.