DataBank Green Finance Framework

DataBank Holdings, Ltd Overview

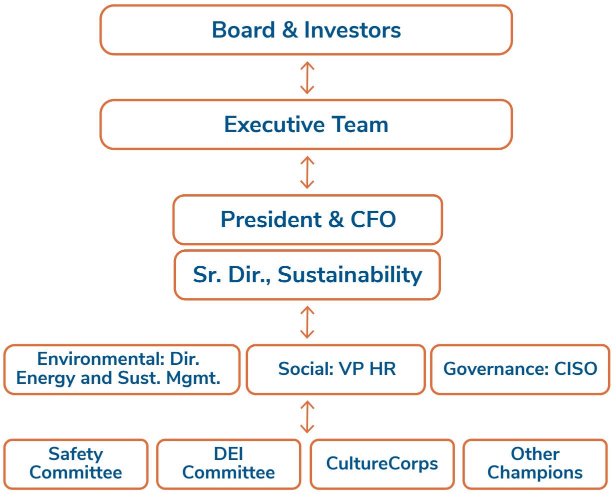
DataBank (together with its consolidated subsidiaries, “DataBank” or the “Company”) is the leading edge data center platform in the U.S. with 65+ data centers in 27+ tier 1 and 2 metros, capable of putting any workload within 100 miles of more than 60% of the U.S. population and has more data centers in more metros than any other provider, public or private, DataBank is evolving the data center experience by enabling enterprises to flexibly shift workloads between our colocation, cloud, and interconnection platforms, providing compliance and managed security services that liberate IT staff, and backing it all up with a culture that inspires confidence and lets you focus on your business.

Environmental, Social, and Governance (ESG) Strategy

At DataBank, we take seriously our responsibility to make positive impacts to the environment, our employees, and the communities in which we operate. We do this by living our corporate values of putting people first, rewarding ownership and collaboration, and demanding transparency and accountability at every level of the organization. Realizing positive ESG outcomes will inspire the confidence, gratitude, and loyalty of our employees, customers, partners, investors, and communities — and make the world a better place. For additional information on DataBank’s ESG Strategy, including key policies and reports, please see the ESG section of DataBank’s website.

Our ESG governance and oversight structure begins with our Board of Directors and cascades throughout the organization.

Board & Investors	Provides guidance and oversight, review quarterly or annual reporting
Executive Team	Advises on and supports ESG initiatives and goals, review quarterly and annual reporting
ESG Leadership	Determines strategy and advises on initiatives and goals. Works with ESG committee and champions to integrate ESG practices throughout company. Produces quarterly reporting
ESG Committee	Collaborates with ESG leadership around strategy, initiatives and goals. Tracks and reports on ESG metrics
ESG Champions	Lead from across all departments, integrate initiatives into their work groups and provide support and accountability around goals. Includes sub-committees including DEI and Safety



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As a commitment to environmental stewardship, we have set a net zero scope 1 and 2 emissions goal by 2030. Additionally, we take both an operational and strategic approach to achieving this target by utilizing energy efficient standard designs, implementing efficiency retrofit projects, utilizing innovative technologies, and purchasing renewable power. We focus on responsible environmental practices through land use, and siting considerations and mitigation, sustainable building practices, water optimization, responsible waste management, and climate risk and resiliency measures.

Our focus on social responsibility begins with our employees and expands to our customers and communities. We thrive on an engaged and inclusive culture both inside and outside the company. Initiatives such as diversity, equity, and inclusion; employee engagement; health and safety; customer and other stakeholder engagement; and corporate citizenship provide a well-rounded culture. Responsible governance is a cornerstone of our business. Good governance starts with strong structural and oversight frameworks at the Board and leadership levels to guide sound policies and continues with engaged employees who embrace ethical practices. In addition to business ethics, risk management, and responsible supply chain, we specifically focus on robust data security and privacy programs to ensure the integrity of our systems and our customers' data.

DataBank recognizes that building and operating data centers leads to a geographic concentration of environmental impacts, even if the total impact is reduced compared to inefficiencies of smaller data rooms. Being a leader in this industry means embracing a responsibility for reducing those impacts. As a result, DataBank's sustainability mission focuses on the following environmental areas:

1. **Energy Management:** Reduce and optimize energy consumption in our data centers through energy efficiency and advanced technology initiatives, including energy storage technologies.
2. **Renewable Power:** Reduce our reliance on fossil fuels by procuring or generating renewable power for our data centers.
3. **Carbon Emissions:** Reduce our impact on climate change by tracking and reducing our carbon emissions in alignment with globally recognized climate change, environmental regulations, and air quality standards.
4. **Sustainable Buildings Practices:** Integrate low-embodied carbon materials, sustainable building envelopes, and resilient design standards into new building and retrofit construction.
5. **Climate Risk and Resiliency:** Reduce our risk of climate-related impacts through scenario analyses, resiliency measures, and business continuity planning initiatives in alignment with globally recognized climate change, environmental regulations, and air quality standards.
6. **Water and Waste Management:** Reduce water consumption through operational standards. Optimize water usage in cooling systems. Consider water constraints in decisions around cooling systems. Reduce waste production through operational standards. Dispose of hazardous waste (including e-waste) responsibly and incorporate recycling and compost where feasible.

Progress against sustainability-related key performance indicators (KPIs) and goals are included in our annual ESG Report. Those include energy consumption and intensity, renewable power consumption, water consumption, GHG emissions, and carbon intensity.

In 2022, DataBank pledged to become carbon neutral by 2030. In 2023, we refined that goal to be scope 1 and 2 net zero by 2030, aligned with the Science-Based Target initiative (SBTi). We intend to submit our commitment to SBTi this year. Additionally, we will work with our suppliers to mitigate scope 3 emissions.

In addition to protecting the environment, we also understand that we have a responsibility to act as good corporate citizens with an opportunity to have a positive effect on our employees, our community members, our suppliers, and our customers. We align our ESG strategy around the following social topics:

1. **Diversity, Equity, and Inclusion**: Recruit, retain, and support employees with a diversity of characteristics, values, beliefs, experiences, backgrounds, preferences, and behaviors. Provide all employees with equal access to opportunities and resources. Foster a culture of inclusion and value around DEI through company-wide training and initiatives.
2. **Employee Engagement and Development**: Provide a supportive workplace with opportunities for wellness, career development, and engagement, and offer competitive benefits and compensation.
3. **Health and Safety**: Provide safe and supportive facilities for employees, contractors, suppliers, customers and community members. Develop safety training programs and provide an avenue for reporting safety concerns.
4. **Customer Experience**: Provide unparalleled colocation data centers, flexible add-on services and industry-leading support, attention, and security to meet or exceed customer expectations.
5. **Corporate Citizenship**: Support local and global communities through employee volunteering and corporate philanthropy.

Finally, responsible governance is a cornerstone of our business. It starts with strong structural and oversight frameworks to guide sound policies and continues with engaged employees who embrace ethical practices. Our governance focal topics include:

1. **Data Security and Privacy**: Safeguard the personal and customer information we collect; process and/or maintain information in accordance with relevant laws and contractual obligations.
2. **Business Ethics**: Promote a culture of ethical conduct and integrity with our employees, partners and suppliers through corporate values and policies, and comply with all applicable laws.
3. **Risk management**: Utilize a robust risk framework to identify, minimize, and monitor systemic business risks.
4. **Responsible Supply Chain**: Encourage and compel vendors, suppliers, partners, and contractors to act in an ethically, environmentally and socially responsible way through supplier programs. Source suppliers and vendors responsibly and with concern for environmental and social practices.

A significant element of DataBank's ESG strategy is a commitment to transparency. The Company's ESG Report is designed to provide disclosures aligned with third-party standards. These standards include the Taskforce for Climate-related Financial Disclosures (TCFD) and the Sustainability Accounting Standards Board (SASB) Guidance. Our ESG strategy and public commitments also intend to directly align with specific United Nations' Sustainable Development Goals (SDGs), including specific SDG indicators and targets:

We have thematic connections to other SDGs, but their specific SDG Indicators are metrics that our activities do not directly affect, and so they are not listed above.

DataBank's Green Finance Framework (the "Framework") promotes our sustainability commitments through connecting our ESG strategy to our financing strategy, advancing and accelerating our progress while providing additional transparency to all stakeholders.

Green Finance Framework

The Green Bond Principles, June 2021 (with June 2022 Appendix 1) ("GBP") and the Green Loan Principles, February 2023 ("GLP"), as administered by the International Capital Market Association ("ICMA") and the Loan Market Association, respectively (collectively "the Principles"), are voluntary process guidelines for best practices when issuing green bonds and loans. The Principles recommend transparency and disclosure and seek to promote integrity in the development of the sustainable finance market. The Framework seeks to align with the Principles which outline the following core components and key recommendations:

- **Use of Proceeds**
- **Process for Project Evaluation and Selection**
- **Management of Proceeds**
- **Reporting**
- **External Review**

This Green Finance Framework will guide future green financings for instruments including bonds, loans (such loans may include, construction loans, term loans, revolving credit facilities, guarantee lines or letters of credit), commercial paper and securitizations (collectively, "Green Financing Instruments"), by DataBank, any of its subsidiaries and/or special purpose vehicles. Bonds or loans may take the form of project financings. Securitizations (e.g., ABS, CMBS) may take the form of either a "Secured Green Collateral Bond" or a "Secured Green Standard Bond," as defined by ICMA in the Green Bond Principles Appendix 1, June 2022. In the case of a securitization in which both green and traditional financing will be issued, a tranche of that financing will be labelled as green only if all of its proceeds are financing eligible green projects.

Though securitizations may be issued by a special purpose vehicle backed by assets owned by DataBank, the underlying sustainability strategy and related green financing approach will be aligned with the Framework. For all issuances by DataBank subsidiaries and special purpose vehicles under the Framework, the Company will be responsible for ensuring continual alignment of the issuance with the criteria defined with the Framework..

Use of Proceeds

DataBank will allocate an amount equivalent to the net proceeds from any contemplated green bond, loan, or Secured Green Standard Bond issued by the Company to finance and/or refinance, in whole or in part, new or existing Eligible Green Projects. Eligible Green Projects are expected to be located throughout the countries in which we operate, including the U.S. and U.K.

For any securitization issued as a Secured Green Collateral Bond, the collateral underlying the securitization will align with the eligibility criteria set forth in this Green Financing Framework at the point of issuance. A portion of the collateral underlying a Secured Green Standard Bond may also align with the eligibility criteria set forth in this Framework. For each green securitization issued, the Company will clearly specify whether a transaction is to finance and/or refinance Eligible Green Projects, the collateral underlying aligns with the eligibility criteria, or a combination thereof, with any additional details clearly outlined in the offering's documentation. For the avoidance of doubt, a property or investment that aligns with the eligibility criteria for "Energy Efficiency Projects" and "Green Building Projects" will be considered eligible collateral for a securitization.

Eligible Green Projects other than green collateral underlying securitizations will include those that have been funded by DataBank within the 24 months prior to the date of the green issuance and those acquired or developed during the life of the bond. DataBank intends to fully allocate Green Financing Instruments within 36 months of each issuance date.

For the avoidance of doubt, the Company will ensure that there is no occurrence of double counting of Eligible Green Projects for any outstanding Green Financing Instrument, including issuance by any special purpose vehicle.

We expect that each of our Eligible Green Projects will meet one or more of the following eligibility criteria (collectively, "Eligible Green Projects"):

Energy Efficiency Projects:

Energy efficiency projects include investments, expenditures, and associated costs which improve the energy performance of new or existing data centers and offices, such as district heating and cooling systems and improvements to data center efficiency. Energy efficiency projects will meet one of the following thresholds:

- Data centers with design Power Usage Effectiveness (PUE) of 1.5 or below for existing, retrofitted and new-build data center infrastructure
- Data centers achieving annualized operating PUE of 1.5 or below for existing, retrofitted and new-build data center infrastructure as of the latest calendar year end prior to allocation
- Upgrades, retrofits, or improvements which improve the overall energy efficiency of a data center by 2% per annum or more through a reduction in losses or improvement in electrical or mechanical efficiencies. Examples include replacement of mechanical and cooling equipment with more efficient designs. This excludes improvements to fossil fuel powered equipment.

Contribution to UN SDGs

9 INDUSTRY, INNOVATION AND INFRASTRUCTURE

12 RESPONSIBLE CONSUMPTION AND PRODUCTION

Green Building Projects:

Eligible green building projects include investments and expenditures related to the design, construction and maintenance of buildings – data centers and offices – which have, or are expected to have, relevant green building certifications or energy ratings. Certifications include:

- **BREEAM:** Excellent or Outstanding
- **LEED:** Gold or Platinum
- **Green Globes:** 3 or 4 Globes
- **ENERGY STAR:** ENERGY STAR score of 85 or greater.

Contribution to UN SDGs

Renewable Energy Projects:

Renewable energy projects include expenditures and associated costs of renewable energy generation and procurement for data centers and offices. Expenditures and investments include:

- Long term (≥ 5 years) direct and virtual renewable power purchase agreements (PPAs) which we have entered into prior to commercial operation of the related renewable energy facility
- Renewable energy generation, limited to solar, wind, geothermal and hydropower sources of generation.
- Battery storage and related infrastructure associated with and/or exclusively used by eligible renewable energy facilities as defined in this framework

Eligible renewable energy projects and related expenditures described above will primarily include solar PV and wind projects but may also include geothermal (where the life-cycle GHG emissions are lower than 100gCO2e/kWh) or hydropower (where either (a) electricity generation facility is a run-of-river plant and does not have an artificial reservoir, (b) the power density of the electricity generation facility is above 10 W/m2, or (c) the life-cycle GHG emissions are lower than 50gCO2e/kWh) projects.

Contribution to UN SDGs

Sustainable Water and Wastewater Management Projects:

Sustainable water projects include expenditures and associated costs of sustainable water management for data centers and offices such as updating or replacing water-efficient cooling solutions. Sustainable water and wastewater management projects will meet the following threshold: Expenditures or investments that result in a 20% improvement in water efficiency or water management as measured by Water Usage Effectiveness (WUE).

Contribution to UN SDGs

Clean Transportation:

Clean transportation projects include expenditures and associated costs for electric vehicle solutions located at or near our offices or data centers, which includes installation, acquisition, modernization, and maintenance of infrastructure projects associated with electric vehicles and charging stations. Projects will exclude new and existing road infrastructure construction and parking facilities construction.

Contribution to UN SDGs

Process for Project Evaluation and Selection

DataBank will follow a transparent process for evaluation and selection of Eligible Green Projects.

Eligible Green Projects for green bond, loan, or Secured Green Standard Bond allocation will be evaluated and selected by members of DataBank's Green Finance Committee, based on the criteria set out in the Framework.

DataBank's Green Finance Committee consists of members of DataBank's ESG, Accounting, Finance, and Legal functions.

For Secured Green Collateral Bonds (and, where relevant, for portions of Secured Green Standard Bonds), collateral underlying the securitization will be evaluated and selected by DataBank's Green Finance Committee based on the eligibility criteria above. No assurances can be made that the proceeds of Secured Green Collateral Bonds will be allocated to fund any such specified categories, projects or assets.

All potential Eligible Green Projects will first comply with local laws and regulations, including any applicable regulatory environmental and social requirements, as well as DataBank's internal policies which aim to manage and mitigate environmental, social, and governance risks. DataBank's Green Finance Committee includes members of the ESG Committee which integrates sustainability and ESG strategy and planning into each function at the company and coordinates cross-functionality, ultimately enabling and ensuring Board oversight. The connection ensures that DataBank's key ESG policies and practices are integrated into Eligible Green Project evaluation as the Green Finance Committee considers environmental and social risks prior to allocations.

Management of Proceeds

DataBank's Chief Accounting Officer will allocate an amount equal to the net proceeds of any green bond, loan, or any securities issuance to an Eligible Green Project portfolio, selected in accordance with the use of proceeds criteria, evaluation, and selection above. DataBank will track investments in identified Eligible Green Projects using its internal accounting system. Any portion of the net proceeds of any green bond, loan, or Secured Green Standard Bond that are unallocated to an Eligible Green Project due to development timelines may be used for the payment of outstanding indebtedness or invested in accordance with DataBank's cash investment policy until all net proceeds are allocated within the 36-month timeframe. In the event a portfolio project no longer meets the eligibility criteria, DataBank will seek to add additional Eligible Green Projects to the green project portfolio to ensure that the net proceeds from a green bond, loan or any securities issuance will remain allocated to Eligible Green Projects.

Reporting

For a green bond, loan, or any securities issuance, DataBank will report on a project portfolio basis the allocation of the net proceeds of the green instrument annually until all net proceeds are fully allocated to Eligible Green Projects and as promptly as practicable in case of any material changes in the proceeds allocation thereafter. In the case of revolving credit facilities, allocation will be reported annually until the maturity of the loan. The first report will be published within one year of issuance and annual reports will follow until the net proceeds are fully allocated. In cases where the report is not made publicly available on the Company's website, the report will be shared with relevant investors or lenders.

An external auditor or an independent third-party consultant with experience in ESG research and analysis, appointed by DataBank, will verify the proceeds allocated and the remaining balance on an annual basis until full allocation. The allocation reporting will include information such as:

- Amount of proceeds allocated to each Eligible Green Project category
- Share of net proceeds allocated to financing or refinancing
- List of Eligible Green Projects funded, to the extent practicable and subject to confidentiality considerations
- Total amount of proceeds allocated
- The balance of unallocated proceeds

In addition to allocation reporting, DataBank will publicly report the environmental impacts of the Eligible Green Projects funded, to the extent feasible, at least at the category level and on an aggregated basis for all of DataBank's green bonds, loans or Secured Green Standard Bonds on the Company's website until full allocation. Examples of potential impact reporting metrics include the following:

- **Energy Efficiency Projects**: PUE, energy savings (MWh per year or over project lifetime), greenhouse gas emissions avoided (mtCO2e)
- **Green Building Projects**: level of certification, greenhouse gas emissions avoided (mtCO2e), PUE
- **Renewable Energy Projects**: electricity from clean and renewable energy (MWh), greenhouse gas emissions avoided (mtCO2e)
- **Sustainable Water Projects**: water use savings (gallons), WUE
- **Clean Transportation**: electric vehicle charging stations installed

For any securities issuance fully allocated at issuance, ongoing reporting regarding allocation of net proceeds is unnecessary because all the net proceeds will immediately be allocated to Eligible Green Projects. For the avoidance of doubt, reporting may occur at the time of issuance in conjunction with offering documentation.

External Review

DataBank's Green Finance Framework has been reviewed by an external provider, who has issued a second-party opinion. The second-party opinion will be published in the sustainability section of DataBank's website.

Upon full allocation of a green bond, loan or any securities issuance, an independent party will verify that the net proceeds have been allocated to Eligible Green Projects. Such verification will be published in the sustainability section of DataBank's website.

For any securities issuance fully allocated at the time of issuance, DataBank may appoint a second-party opinion provider to evaluate alignment of the portfolio of green assets and expenditures.

Disclaimer

The information contained in this Green Finance Framework is current as of the date of this document and is subject to change without notice. The Company does not assume any responsibility or obligation to update or revise any statements herein, regardless of whether those statements are affected by the results of new information, future events or otherwise.

The material provided herein is for informational purposes only. It does not constitute an offer to sell or a solicitation of an offer to buy any securities relating to any of the products referenced herein, notwithstanding that any such securities may be currently being offered to others. Any such offering will be made only in accordance with the terms and conditions set forth in the offering documents pertaining to such fund. Prior to investing, investors are strongly urged to review carefully all of the offering documents. No person has been authorized to give any information or to make any representation, warranty, statement, or assurance not contained in the offering documents.

FORWARD-LOOKING STATEMENTS. This Green Finance Framework contains "forward-looking statements". When we use words such as "may," "will," "intend," "should," "believe," "expect," "anticipate," "project," "estimate" or similar expressions that do not relate solely to historical matters, we are making forward-looking statements. Forward-looking statements are not guarantees of future performance and involve risks and uncertainties that may cause our actual results to differ materially from our expectations discussed in the forward-looking statements.

The United Nations Sustainable Development Goals (SDGs) are aspirational in nature. The analysis involved in determining whether and how certain initiatives may contribute to the SDGs is inherently subjective and dependent on a number of factors. There can be no assurance that reasonable parties, including the Company, or any third-party consultant will agree on a decision as to whether certain projects or investments contribute to a particular SDG. Accordingly, investors should not place undue reliance on the Company's application of the SDGs, as such application is subject to change at any time and in the Company's sole discretion.

There is currently no generally accepted definition (legal, regulatory or otherwise) of, nor market consensus as to what criteria a particular financial instrument must meet to qualify as "green," "social," or "sustainable" (and, in addition, the requirements of any such label may evolve from time to time), no assurance is or can be given that expectations regarding the sustainability-related criteria set out in this Green Finance Framework will be met, or that any adverse social and/or other impacts will not occur in connection with the Company striving to achieve the sustainability-related criteria set out in this Green Finance Framework.