

Environmental, Social, Governance (ESG) Policy

2024

Global Adherence Commitment

MISSION & PURPOSE

STACK Infrastructure (“STACK”) supports a sustainable digital future. We aim to design, construct, and operate data centers that scale digital progress, protect the natural world, and strengthen communities.

The purpose of this policy is to emphasize STACK’s commitment and approach to integrating Environmental, Social, Governance (“ESG”) factors into our business for the benefit of internal and external stakeholders.

STACK is owned and sponsored by IPI Partners (“IPI”), a private equity firm focused on data centers as well as other technology and connectivity-related real estate assets. STACK is comprised of multiple corporate entities – with operations and executive leadership organized by operating region, STACK Americas, STACK APAC, and STACK EMEA – which adhere to this ESG Policy.

INTRODUCTION

In an era marked by rapid digitization as well as intensifying awareness of environmental and social justice, we understand ESG to be a business imperative.

STACK has a comprehensive ESG strategy, which carefully addresses our response to material risks and opportunities while exemplifying our corporate values. Our ESG philosophy is rooted in environmental stewardship, collective social benefit, and responsible business practices.

As data center development scales globally, so does our industry’s resource consumption and impact on the communities in which we operate. Gaining and preserving STACK’s social license to operate requires active engagement with our stakeholders. We recognize the importance of demonstrating how our developments can enhance local environments and bring economic and societal value.

GOVERNANCE & OVERSIGHT

STACK and IPI have an established governance structure to ensure accountability, communication, and progress on ESG initiatives. This comprehensive, overarching global approach is executed locally within each of STACK’s operational regions: Americas, APAC, and EMEA.

1. ESG strategy and execution is ultimately the responsibility of each regional STACK CEO. Each CEO has elected ESG Leadership within their respective region to guide the development and execution of environmental sustainability and social impact programs, foster cross-regional collaboration, as well as ensure adequate ESG reporting to measure progress.
2. IPI’s Head of ESG works directly with STACK’s regional ESG representatives to ensure alignment with investor expectations and industry best practice.
3. STACK and IPI have appointed one of the regional CEOs as the Executive Sponsor of the global ESG strategy. The Executive Sponsor’s duties involve ensuring executive support of regional and global ESG priorities, thereby fostering coherence across the organization.



4. Regional CEOs contribute to STACK's global ESG strategy through participation on an ESG Leadership Council, which aims to increase visibility into and alignment on STACK ESG priorities, commitments, and resourcing requirements.
5. STACK's ESG progress is reported by each region quarterly to the Board of Directors. This reporting includes performance indicators across key Environmental Sustainability, Social Impact, and Governance areas, as well as upcoming milestones.

STRATEGIC AREAS OF FOCUS

Environmental Sustainability

Throughout each step of the real estate life cycle (design, construction, and operations), we seek to integrate solutions that promote environmental stewardship.

- **Carbon:** We commit to measure and reduce our greenhouse gas emissions impact through data management and transparency, piloting and standardizing decarbonization initiatives, as well as supporting partnerships that scale climate action across the digital infrastructure industry.
- **Energy:** We design for energy efficiency and source clean energy.
- **Water:** We conserve potable water through water efficiency and reuse, leveraging low-water cooling systems, as well as onsite or municipal recycled water systems where possible.
- **Waste & Circularity:** We support landfill and incineration diversion through recycling in construction and operations.
- **Land Use & Biodiversity:** We reduce environmental harm through following best practices for environmental health and safety and protecting ecosystems services during development.

Social Impact

Our commitment to social impact is core to STACK's corporate identity. Acknowledging our societal role, we engage in initiatives that promote socio-economic benefits and invest in future generations of the digital economy.

- **Workplace Health & Safety:** We are dedicated to maintaining excellent workplace health and safety standards, prioritizing employee well-being and minimizing incidents through proactive measures and ongoing improvement efforts.
- **Diversity, Equity & Inclusion:** We are dedicated to a discrimination-free workplace, ensuring fair treatment in all aspects of employment without regard to race, religion, disability, origin, genetic information, age, sexual orientation, gender, marital status, or citizenship status.
- **Employee Engagement:** We are dedicated to cultivating an engaged, diverse, and inclusive culture that attracts, retains, and fully engages top talent, fostering an environment where everyone feels valued and empowered to contribute.
- **Community Impact:** We aim to positively impact our operating communities through engaging with local governments and community members in support of socially responsible, sustainable development.
- **Science, Technology, Engineering, Mathematics (STEM) Education:** We support a diverse pipeline of talent into the data center industry through the promotion of industry-relevant STEM education programs.



Governance

STACK is committed to responsible corporate operations and business ethics through mechanisms which prioritize the following:

- **Integrity:** Doing business with integrity, including zero-tolerance for ethical violations.
- **Oversight:** Creating a culture of internal oversight, setting in place transparent processes that make reporting issues clear and simple.
- **Security:** Ensuring the protection of sensitive information and infrastructure assets against cyber threats and unauthorized access.
- **Compliance:** Adhering to the relevant regulations, standards, and internal policies, mitigating legal and operational risks, while upholding transparency and accountability.

Further supporting our commitment to good governance, STACK has built codes of conduct, anti-corruption policies and procedures, and data security policies and procedures. The following is a select list of relevant policies in place within one or more of STACK 's global regions, as needed and in accordance with legal and regulatory requirements:

- Employee Code of Conduct
- Equal Opportunity & Diversity Policy
- Foreign Corrupt Practices Act Compliance Mechanisms
- Human Rights Policy
- Modern Slavery Policy
- Supplier Code of Conduct
- Whistleblower Policy

STANDARDS & CERTIFICATIONS

We align our data center operations with industry best practice. This includes meeting local codes and regulations, as well as adhering to globally recognized ESG standards where feasible. The following is a select list of relevant third-party certifications that one or more of STACK 's global facilities is in compliance with:

- **HIPAA:** Health Insurance Portability and Accountability Act
- **ISAE 3000 & 3402:** International Standard on Assurance Engagement
- **ISO/IEC 27001:2023:** Information security management systems
- **ISO14001:** Environmental Management
- **ISO45001:** Health and Safety Management
- **ISO50001:** Energy Management
- **LEED:** Leadership in Energy and Environmental Design
- **PCI:** Payment Card Industry Data Security Standard
- **SA8000:** Social Accountability Certification
- **SSAE18 Type 2 SOC 1 & SOC 2:** Effectiveness of Controls
- **UL 2799:** Zero Waste Certification



PARTNERSHIPS

We proudly align ourselves with organizations and initiatives that share and support our vision for a sustainable future. Among these are:

- **AFCOM:** Engaging with industry leaders and professionals to share knowledge and best practices, driving innovation and excellence in data center operations.
- **Climate Neutral Data Center Pact:** Affirming our pledge to achieve carbon neutrality across our EMEA data center operations.
- **Data Center Safety Council:** Establishing a unified approach towards ensuring safety and wellbeing of personnel in data center operation.
- **Girl Scouts of America:** Promoting diversity in STEM education through the creation of a data center training module for girl scouts.
- **Go-Tec! Laboratory:** Partnering with educational institutions and research centers to promote STEM education and skills development.
- **iMasons Climate Accord:** Demonstrating dedication to combatting climate change alongside industry leaders.
- **Women's Forum:** Supporting gender diversity and empowerment initiatives within our communities, fostering inclusivity, and equality.
- **Clean Energy Buyers Alliance:** Supporting efforts to expand access to renewable energy procurement options and advance clean energy solutions.
- **EU Code of Conduct for Data Center Energy Efficiency:** Adhering to European Union standards for enhancing energy efficiency in data center operations.
- **Heroes of the Sea:** Benefitting the United States Coast Guard's Chief Warrant Officer's Association through fundraising.

We are dedicated to sustainable practices, positive societal impact, and responsible governance. Through global collaboration and local action, these values infiltrate our organization, enhancing stakeholder benefit.

A handwritten signature in black ink that reads "Brian C. Cox".

Brian Cox
CEO, STACK AMERICAS

A handwritten signature in black ink that reads "John Eland".

John Eland
CEO, STACK EMEA

A handwritten signature in black ink that reads "Preet Gona".

Preet Gona
CEO, STACK APAC