Group ESG Policy

At STT GDC, we recognise that our role in enabling our digital future comes with the responsibility to minimise our environmental impact and prioritise the well-being of our employees, workers and the communities we operate in. As a leading data centre provider, we are dedicated to integrating sustainable practices into every aspect of our operations. This policy reflects our commitment to:

- Ensure effective and efficient management of our environment footprint with emphasis on decarbonisation throughout our value chain and material topics including water, waste and resource use.
- Foster a safe, secure, diverse and inclusive workplace, and amplifying positive community impact.
- Power a resilient and sustainable digital future through an unwavering commitment to governance and integrity, strengthened cybersecurity, responsible procurement practices, and enhancing the economic vitality of the communities we operate in.

SCOPE AND ORGANISATIONAL COMMITMENT

This policy applies across the entire STT GDC group of companies, including our data centres, construction sites and corporate offices in our subsidiaries, associates and joint venture companies. It defines our core values, guiding principles and the expectations we have on all functions and individual responsibilities across the Group.

To ensure effective implementation, this policy will be reinforced through appropriate standards, procedures and controls. STT GDC is committed to complying with local regulations, procedures and external commitments in all jurisdictions and regimes where it operates. In case of any conflict between this policy and local regulations, local regulations will take precedence.

STT GDC will provide the necessary resources including manpower, training, access to information, and infrastructure to achieve the commitments set out in this policy.

OUR ENVIRONMENTAL PRINCIPLES

STT GDC recognises its role in contributing to global efforts to manage environmental sustainability and mitigate the effects of climate change. We do so by responsibly managing our environmental footprint including greenhouse emissions, energy efficiency, water, waste and resource use. Our strategy is predicated on the mitigation hierarchy, a prioritisation approach towards alleviating environmental harm as far as possible through avoidance, reduction, then replacement.

We commit to:
- Embed environmental practices throughout the entire value chain to achieve carbon neutrality in our data centre operations by 2030.
- Manage and continually improve environmental performance throughout our operations using a systematic approach based on the Plan Do Check Act cycle.
- Prioritise the sourcing of high-quality renewable energy, depending on solutions available in the respective countries.

- Establish processes and procedures to address significant environmental aspects in our operations, including:
  - Greenhouse gas emissions
  - Energy use and performance
  - Water use and performance
  - Waste management
  - Resource use
- Identify opportunities to reduce carbon, energy and water use in operations and implement efficiency measures where feasible.
- Assess, pilot and deploy novel technological solutions through our R&D process to manage our significant environmental aspects.
- Design and construct new data centres with sustainability principles in mind and in alignment with industry green building certifications.
- Incorporate criteria for energy and water efficiency, as well as improvements in energy and water performance, in the review of replacement equipment during asset refresh.

OUR SOCIAL PRINCIPLES

STT GDC is committed to ensuring the health, safety and well-being of our employees and workers. We strive to make a positive impact on the communities we operate in by investing in local community development initiatives and giving back through employee volunteerism and philanthropy.

We commit to:
- Safeguard the health, safety and well-being of our workers and employees (Refer to Group EHS Policy).
- Foster a workplace that prioritises diversity, equity and inclusion.
- Develop and retain talent by investing in learning and development programmes for our employees.
- Promote economic and social development of the communities we operate in.

OUR GOVERNANCE PRINCIPLES

STT GDC upholds the highest standards of corporate governance, ensuring transparency, accountability and integrity across our business. Our governance framework is designed to promote ethical behaviour, compliance with all relevant laws and regulations, and effective risk management, with our Board of Directors having the highest oversight of ESG and climate/energy matters.

We commit to:
- Maintain the highest ethical standards by ensuring that all employees and representatives of STT GDC adhere to our Code of Conduct and Anti-Corruption Policy.
- Ensure the confidentiality, integrity and availability of our data by requiring all employees and representatives of STT GDC to abide by the Global Cybersecurity Policy.
- Embed ESG aspects in the consideration of potential mergers, acquisitions and joint venture partners.
- Continually monitor physical and transition climate risks and incorporate them into our enterprise risk management framework.
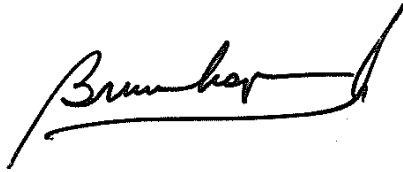
- Work closely with our supply chain partners to encourage environmentally and socially responsible practices.

TARGET SETTING AND DATA REPORTING

- Set targets and regularly monitor, report and verify ESG metrics based on continuous improvement and pollution prevention principles.
- Transparently communicate progress towards ESG goals to stakeholders.

STAKEHOLDER ENGAGEMENT

- Equip our employees and business partners with the necessary skills and knowledge to work in a safe, operationally resilient and responsible manner.
- Collaborate with governments, businesses and other industry organisations to drive collective progress in sustainability.
- Communicate our ESG progress in our annual ESG reports and website.

_____

Bruno Lopez
President & Group Chief Executive Officer
ST Telemedia Global Data Centres