

## EcoDataCenter Sustainability Policy

### Company vision

EcoDC's vision is a world where AI infrastructure powers global innovation and local progress. Guided by this vision, our sustainability policy reinforces our commitment to ensure our operations benefit both the environment and the communities where we operate. We strive for leadership in sustainable digital infrastructure by actively minimizing our environmental footprint, promoting social responsibility, and fostering local economic development. By embedding sustainability into our organization, from strategic decisions to everyday operations, EcoDC aims to create lasting positive impacts, ensuring a balance between technological advancement, environmental stewardship, and community enrichment.

### About the sustainability policy

EcoDC's sustainability policy applies to the entire group and forms the basis for the company's sustainability work. EcoDC complies with laws and requirements and fulfils its commitments, for example linked to current environmental permits and third-party certification. Sustainability is deeply integrated into the company's strategy, decision-making processes and governance. EcoDC's Board of Directors has overall responsibility for the strategic direction of the sustainability work and follow-up of set sustainability goals. The CEO, together with the management team, has overall responsibility for the operational implementation and daily monitoring of the sustainability work. The success of the sustainability programme requires close cooperation between the Board and management.

Within the framework of the business plan, EcoDC strives to reduce its dependence on resources in order to limit the company's negative environmental impact and increase our resilience as a company. EcoDC monitors and reports on material sustainability impacts based on double materiality analysis according to ESRS. As part of this work, actual and potential impacts of the company's operations are systematically identified and assessed. The company's material impacts on the environment and people, as well as the related risks and opportunities, are publicly disclosed as part of our annual sustainability report.

### Targets and third-party auditing

Sustainability goals are an essential part of the company's overall goals and governance. The company's sustainability goals are public and are stated on [EcoDC's website](#). An annual sustainability report is prepared in accordance with globally accepted frameworks such as the GHG Protocol and GRI and is third-party audited by an independent auditor. We report progress to the UN Global Compact and undergo annual third-party assessment based on CDP and EcoVadis. We are certified to ISO9001 and ISO140001.

### Environmental impact of operational activities

The identification, assessment and management of environmental aspects is a central part of EcoDC's environmental work. As a complement to the identified impact based on double materiality analysis according to ESRS, the organisation determines which aspects have or may have one or more types of significant environmental impact based on established criteria. The basis for significant environmental aspects in our operations are listed in the Environmental Aspects List. Each employee has a responsibility to raise incidents or suggestions for improvement in order to continuously improve our environmental work. Furthermore, it is incumbent on all employees concerned to follow the operational routine descriptions that are linked to the environment in their daily work.

### Environmental impact in the value chain

We actively engage with our suppliers and partners in the value chain to collectively minimise the environmental impact of our operations. We systematically monitor and report our indirect environmental impacts to stakeholders. New suppliers undergo a due diligence process, and all suppliers sign our [supplier-specific Code of Conduct](#). We are committed to respecting all internationally recognised human rights along our value chain and strive to work in accordance with the UN International Covenant on Human Rights and the principles of fundamental rights. All operators active on site are subject to General Environmental, Health and Safety Regulations set up by EcoDC.

### Social sustainability

We promote equality and diversity in the workplace by ensuring that all employees are treated equally, regardless of gender, ethnicity, religion, sexual orientation or disability. Science shows that diversity in the workforce increases creativity, broadens our horizons and boosts competitiveness. We strive to create an inclusive work environment where all employees feel valued and respected. We want our company to be psychologically and physically safe, which is why we eliminate workplace hazards and systematically reduce health and safety risks. These positions are also reflected in our [Code of Conduct](#). We take responsibility for supporting and developing the local community around our operations. By prioritising local suppliers in purchasing and procurement and actively participating in projects and initiatives that promote sustainability and community development, we contribute to positive and sustainable development in the local area.

### Communication

We welcome talking about sustainability issues, and we communicate responsibly and factually about the environment and sustainability internally and externally. We avoid greenwashing by being clear and transparent about our progress as well as our challenges.

### Environmental awareness of employees

We work to constantly increase the environmental awareness of all employees, both in matters related to their professional role and in the behaviour and choices they make as employees. The basis for this is that all employees sign our [Code of Conduct](#), which contains clear expectations regarding sustainability. In addition, there is annual training in sustainability and incentives for making sustainable choices.

### Enforcement and compliance

Everyone working at EcoDC is subject to this environmental policy and is responsible for applying and respecting its content. The owner of the environmental policy is the Group's CEO, who has operational responsibility for implementation together with management and supervisors. Compliance with the environmental policy is regularly monitored as a natural part of regular operations, for example during internal and external audits. The environmental policy is approved by the CEO. The policy is reviewed annually to ensure relevance and continuous improvement.