

# ENVIRONMENTAL SUSTAINABILITY POLICY

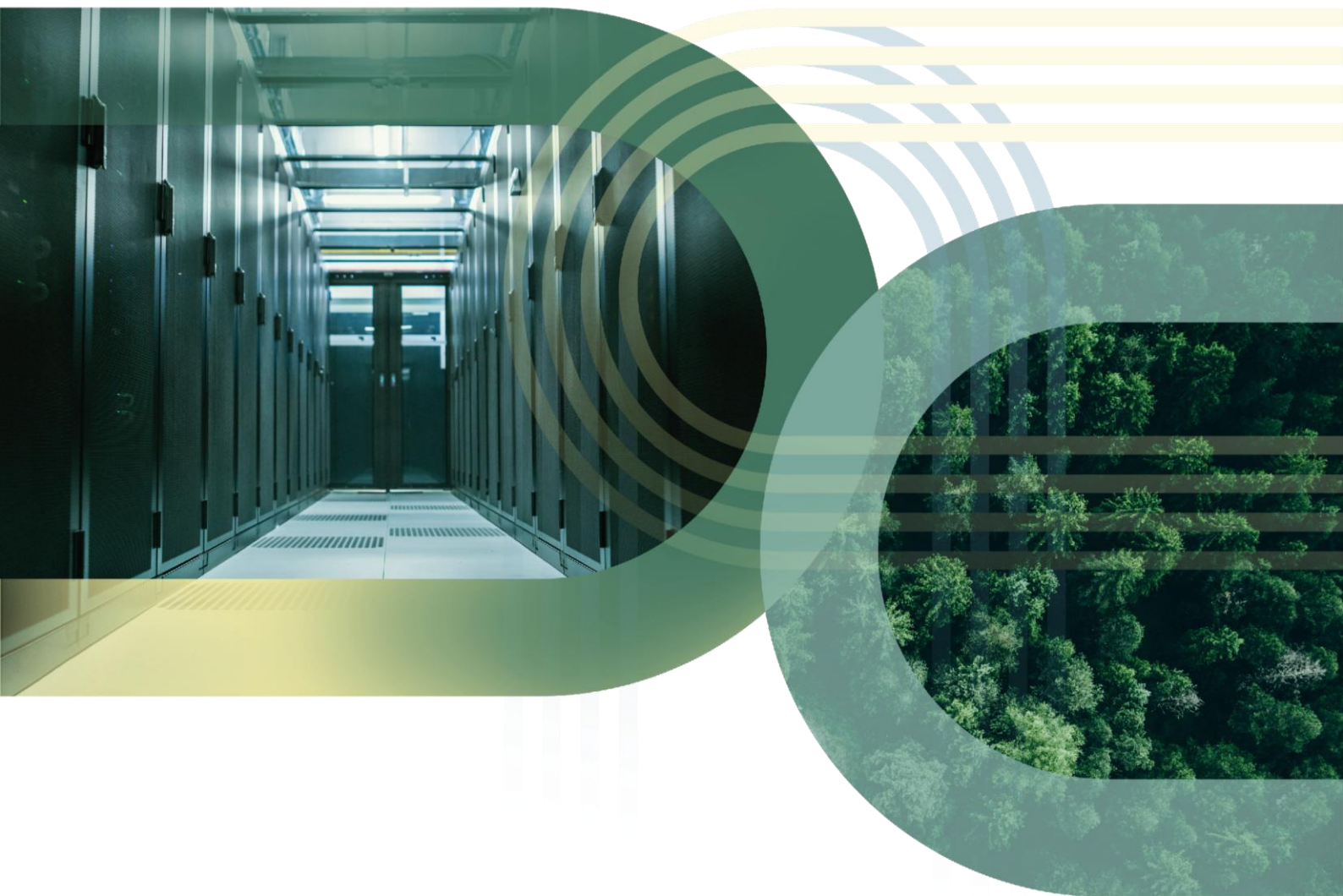


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Version History

Version No.	Date (DD/MM/YYYY)	Change Description	Author
1.0	05/02/2025	Initial Draft	Francesco Marasco
1.1	18/03/2025	Second Draft	Louise Alter
1.2	16/04/2025	Third Draft	Louise Alter
2.0	14/05/2025	Policy Issued	Louise Alter

## INTRODUCTION AND PURPOSE

This environmental sustainability policy articulates nLighten's commitment to environmental sustainability and defines our comprehensive approach to minimising environmental impact across our operations. nLighten UK TopCo Ltd. and all its affiliates (together "nLighten") shall comply with this Policy, and shall procure compliance by its, employees, contractors, and relevant stakeholders who contribute to its operations and service delivery.

nLighten, as leader in the edge data centre industry recognises the impact of its data centres on the environment and is determined to ensure it reduces its impact to a minimum while providing value-add both to the customer, communities that it is hosted in and the wider energy system contributing to overcoming the challenges posed by climate change.

## OWNERSHIP

The successful implementation of this policy requires commitment at all organisational levels. While ultimate accountability rests with the senior management team, each department head is responsible for ensuring compliance within their operational area. All employees play a crucial role in achieving our environmental objectives through their daily activities and decisions.

The policy is owned by Energy Operations and Sustainability (EOS) department.

## SCOPE

The policy covers all countries of operation of nLighten HQ BV and its subsidiaries, excluding operational assets and subsidiaries acquired from third parties in the first eighteen months of operational control. In the first six months of operations from the date of acquisition, a plan for alignment to this policy shall be prepared by the integration team and approved by senior management.

## POLICY

### 1. Policy Statement

nLighten acknowledges its fundamental responsibility to operate in an environmentally sustainable manner. We understand that our operations have a significant direct impact on the environment, particularly through energy consumption, resource usage specifically carbon emissions. Our commitment extends beyond mere compliance with environmental regulations; we actively seek to minimise our environmental footprint while maintaining excellence in our services and supporting our clients' digital transformation needs. We are dedicated to the protection of the environment, including the prevention of pollution, sustainable resource use, and climate change mitigation and adaptation. Our specific commitments include transitioning to 100% renewable energy sources, implementing advanced cooling technologies to reduce water consumption, and continuously improving our waste management practices to promote a circular economy within our operations applying the four R's approach: Reduce, Reuse, Recycle and Recover.

## 2. Vision and Goal

### 1. Carbon Neutrality

Our paramount environmental goal is to support the decarbonisation of the energy systems and communities we operate in. This ambitious objective requires a multifaceted approach to reducing our carbon footprint across all operational aspects. We aim to implement comprehensive monitoring systems to track our carbon emissions by 2025 and establish reduction targets by 2026. Through regular assessment and reporting, we maintain transparency in our progress toward carbon neutrality and identify areas for improvement. We are committed to transparent communication regarding our environmental performance and will periodically provide updates on our progress through sustainability disclosures.

### 2. Operational Sustainability

Energy management stands at the core of our environmental strategy. We are committed to maximizing the use of renewable energy sources across our data centres, implementing this through a systematic approach to power infrastructure development and maintenance. We are fundamentally focused on renewable energy development. Operationally, we are committed to over time seek to implement and execute carbon emissions reduction measurements and plans to reduce in connection with this focus as the company scales its operations.

Our energy management program includes the development of innovative solutions for renewable energy backup systems, ensuring reliability while maintaining our environmental commitments. Through continuous monitoring and optimisation of energy consumption patterns, coupled with regular energy audits, we identify and implement efficiency improvements throughout our operations. Across our Data Centres in France, stringent energy management practices are also in place in line with ISO 150001 requirements. In our other location, we are in the process of upgrading legacy sites to the highest standard and implementing operational best practice.

### 3. Resource Efficiency

Our approach to resource management encompasses comprehensive strategies for water conservation, waste reduction, and materials lifecycle management. We seek to improve our resource efficiency, including energy and water, by adopting best practices and innovative technologies suited to our operational environment. nLighten has opted for air-sourced cooling or water-sourced looped cooling to minimise overall water usage and reduce the impact of the operations on the environment.

We are committed to ensuring the availability of information and necessary resources to achieve our objectives and energy targets. This commitment includes providing transparent access to relevant data, allocating adequate financial and human resources, and fostering a culture of continual improvement in resource efficiency.

### 4. Circular Economy

Environmental sustainability is a fundamental principle in our data centre design and development process. This commitment manifests in our selection and implementation of energy-efficient cooling systems, advanced monitoring technologies for energy and temperature management, and our approach to equipment specification. We ensure all key components are designed for repairability and upgradeability, extending their operational life and reducing waste. Our facilities are equipped with comprehensive metering circuits that enable precise consumption monitoring and optimisation.

### 3. Implementation Strategy

#### 1. Renewable Energy

nLighten is fundamentally focused on renewable energy development. Operationally, we are committed to over time, seek to implement and execute carbon emissions reduction measurements and plans to reduce in connection with this focus as the company scales its operations

Today, we are purchasing 100% renewable electricity through certificates across countries. We are committed to move beyond traditional certificates by:

- Increasing the transparency and positive impact by establishing a clear view of the source of energy on an hourly basis. Specifically, nLighten is currently developing a robust methodology for tracking which will enable the setting of targets and strategy to enable 24/7 Carbon-free Energy (CFE).
- Building on-site generation assets and direct wire connections to close standing buildings ensuring the origin of the energy and reduce congestion on the local networks.
- Moving away from diesel generators to power back-up solution where possible.

#### 2. Energy Efficiency and waste management

We are providing actively looking to provide waste heat directly to the communities and stakeholders that are in close vicinity of the data centre. Six sites have been identified through feasibility studies for heat export and advanced commercial discussions are taking place. nLighten is committed to further exploring the feasibility of extending these schemes onto the remaining portfolio. A review is also taking place to establish the potential for the replication of best practice on the themes of energy efficiency and waste management. The initial outcomes has led to all sites outside of France, to receive upgrade to ensure the power usage effectiveness is in line with ENEC and EED by 2030 on the back of significant refurbishment investments.

#### 3. Stakeholder and Community Engagement

Success in environmental sustainability requires active collaboration with all stakeholders. We work closely with our customers striving to mitigate their environmental impacts, optimise their energy consumption patterns and partner with suppliers to develop increasingly sustainable solutions. Our employees are engaged through a training programme which is part of the induction pack and has been pushed through the business. We maintain transparent communication about our environmental performance with all stakeholders, fostering a collaborative approach to sustainability. We expect our suppliers and partners to operate in a responsible manner and to work towards sustainable procurement practices. We aim to engage with vendors to identify opportunities for environmental improvements across our supply chain.

#### 4. Employee Responsibility

Environmental awareness and responsibility are core elements of our organisational culture. All employees receive comprehensive environmental awareness training and are encouraged to participate in environmental initiatives. We actively support and implement innovative ideas for environmental improvements proposed by our staff, recognising that environmental responsibility is a shared commitment across our organisation.



4. Compliance and Standards

1. Regulatory Compliance

Our commitment to environmental responsibility begins with strict adherence to all applicable environmental laws and regulations laws, regulations and other requirements related to energy efficiency, energy use, and energy consumption. We comply with applicable environmental regulations in our operating jurisdictions and strive to align with recognized industry standards. Where feasible, we integrate elements of internationally recognized environmental and energy management frameworks into our sustainability strategy.. Our commitment extends beyond minimum requirements, as we strive to exceed regulatory standards wherever possible.

2. Industry Standards

We actively engage with industry best practices in data centre sustainability, pursuing relevant environmental certifications and participating in industry initiatives for environmental improvement. As such nLighten is a key member of the 24/7 Energy Compact focused on increased transparency. This engagement ensures we remain at the forefront of sustainable data centre operations while contributing to the industry's collective environmental progress.

5. Reporting and Transparency

Our environmental performance monitoring system tracks key metrics across all operational areas and is shared with our stakeholder upstream and downstream where appropriate. Specifically on the electricity purchasing, nLighten have engaged with a leading industry partner on establishing better tracking of origin and downstream utilisation of electricity and its conversion to heat.


To ensure that we can continuously track our progress and provide full transparency to our customers and the wider market we are following a framework that links together directly our objectives, targets and commitment as Impacts to activities, KPIs, Output, Outcomes.

Activity	KPI	Output	Outcome	Impact
<i>Describes the intervention taken</i>	<i>Specific indicator that indicates the progress in achieving the desired result</i>	<i>The immediate result of the activity</i>	<i>The changes it provides to various stakeholders</i>	<i>The long term objective the activity achieves.</i>

6. Review and Update

This Policy undergoes annual review and updates to maintain its relevance and effectiveness. Reviews consider changes in environmental legislation, technological developments, evolving industry standards, company growth, operational changes, and stakeholder feedback. This regular review process ensures our environmental Policy remains a living document that effectively guides us towards the continual improvement of our environmental and energy performance and supporting management systems.

DocuSigned by:



Signed.....2F44B29846764B1.....Date .....14 May 2025 | 18:52 CEST

Harro Beusker

Chief Executive Officer

## APPROVED EXCEPTIONS

Certain legacy sites namely, Bridgend, may require a phased approach to align with our sustainability objectives. Any site-specific adjustments will be assessed based on operational feasibility and reviewed periodically

## REFERENCES

Company Employee Handbook, Supplier Code of Conduct, and Responsible Contractor Policy.