Through management leadership, employee engagement, and communication with all persons working on our behalf, we are committed to responsible environmental stewardship, focusing on four primary topics: Climate, Water, Biodiversity, and Circular Economy. We are committed to responsible action on these topics across our value chain, including suppliers, operations, and impacts to communities

1.0 SUSTAINABILITY GOVERNANCE

a. Respect the environment and culture of the local communities in which we operate.
b. Conform to the spirit as well as the letter of environmental laws, regulations, company policies, and procedures. Where local laws and regulations are not strong, we will follow international norms and industry standards.
c. Integrate sustainability considerations into business planning, construction and building material selection, procurement, decision making, and daily activities.
d. Enhance our sustainability culture, management and performance through continual improvement and a focus on prevention.
e. Pursue challenging sustainability goals, and measure and report progress towards them.
f. Acknowledge and reduce our contributions to climate change, including setting and pursuing targets to reduce our carbon emissions to zero.

2.0 RISK ASSESSMENT

a. Analyze how climate change will create risk for our operations, and work to mitigate those risks, with a particular focus on threats to water security.
b. Assess risks from water scarcity and security on our operations and local communities, taking into account both current conditions and the predicted future impacts of climate change.

3.0 DEVELOPMENT, DESIGN, AND CONSTRUCTION

a. Reduce impacts to biodiversity and protected species when selecting sites for new facilities, avoiding legally protected areas, IUCN Category I-IV protected areas, High Conservation Value areas, and World Heritage areas.
b. Design and build new facilities that do not consume water for cooling.
c. Pursue construction methods that increase use of recycled-content and lower-carbon materials and reduce waste through upstreaming.

4.0   OPERATIONS

a. Prioritize renewable and carbon-free energy sources that result in additional new generation capacity, are located near where we operate, and do not contribute to additional environmental harms.

b. For existing facilities with a dependency on water for cooling, reduce water consumption through operational efficiency and equipment upgrades.

c. Reduce electricity supply chain water consumption through increased use of low-water renewable electricity sources.

d. Prevent, minimize, and control water pollution and impacts to local water supplies through proper management of hazardous waste and wastewater discharge.

e. Ensure that we do not negatively impact Water, Sanitation, and Hygiene (WASH) in the workplace or communities where we operate and uphold basic access to water and sanitation as a human right.

f. Maintain and improve the biodiversity of land under our responsibility, including landscaping with native species to improve habitat and decrease water required for irrigation.

g. Eliminate the use of inorganic fertilizers and pesticides in our landscapes to prevent contributing to habitat and water pollution.

h. Reduce waste across our portfolio through environmentally preferable procurement, partnership with suppliers, and proper recycling of electronic waste.

5.0   COLLABORATION

a. Promote water conservation within the data center industry as a key topic requiring greater transparency.

b. Work with customers to align our incentives with theirs for improved sustainability in our operations.

c. Partner with communities to use collective action to restore water flows in nearby watersheds in high water stress regions.

6.0   PROGRAM REVIEW

Review/Change	Responsible Party	Date of Change
New Policy	K. Myers	2022-01
Annual Review/Update	K. Myers	2023-07