



Quality and Environmental Policy

APL DATA CENTER

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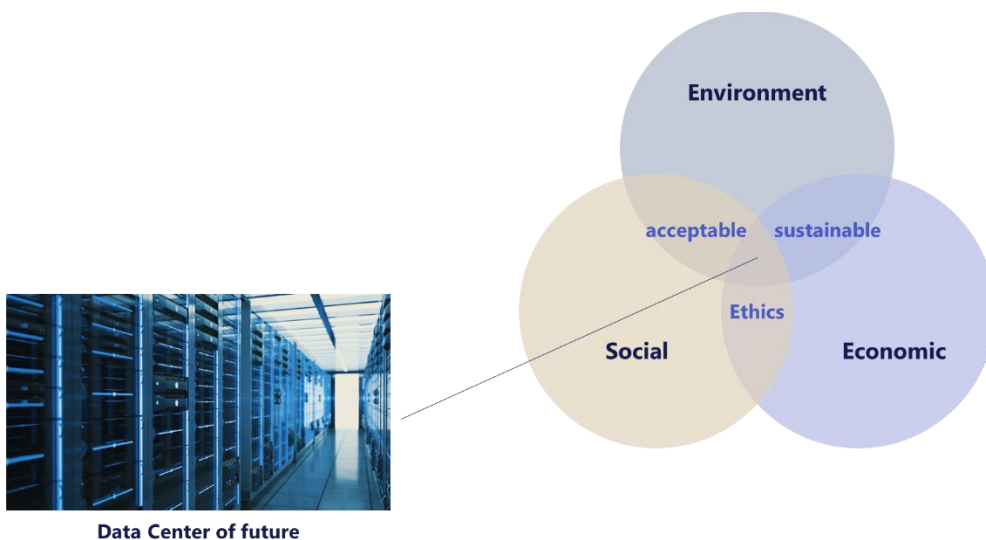
FOREWORD

1. VISION OF APL DATA CENTER

Data centers are the essential physical links in the digital world. Their surface area and number are expanding rapidly to support and host the digital services we all use every day.

Today, at a time when the development of the digital economy cannot ignore its impact on real society, APL Data Center is committed to minimising the challenges of sustainable development for data centers, strategic links and the foundations of a responsible digital economy.

APL Data Center shares the strong belief that it is possible to reconcile the development of digital technology with the challenges of sustainable development by rethinking the data center of the future.



2. MISSION OF APL DATA CENTER

As part of its commitment to sustainable development, APL Data center has adopted a mission called Organic Design: to create data centers that are scalable, secure, efficient and in symbiosis with their environment, so that the proliferation of digital uses and the data centers that support them are compatible in the long term with our environment and the development of our cities.

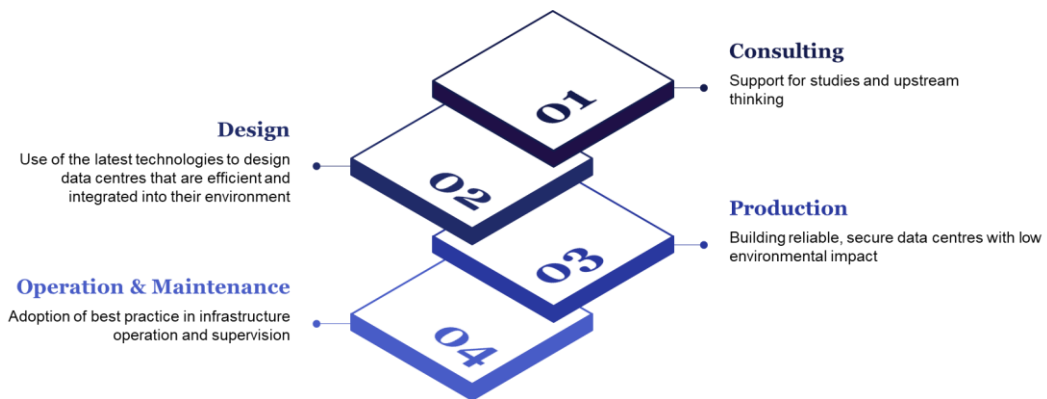
There can be no high-performance Data Centre without sustainability, and no sustainable Data Centre without performance.



DEFINITION

☞ Data centres **in symbiosis with their environment**, in designed to be as energy-efficient as possible, adapting to the needs of our customers and to future developments while keeping their impact (noise, visual and environmental) to a minimum. ☞

At APL Data Center, we provide expertise and a coherent global vision across the entire data center life cycle:

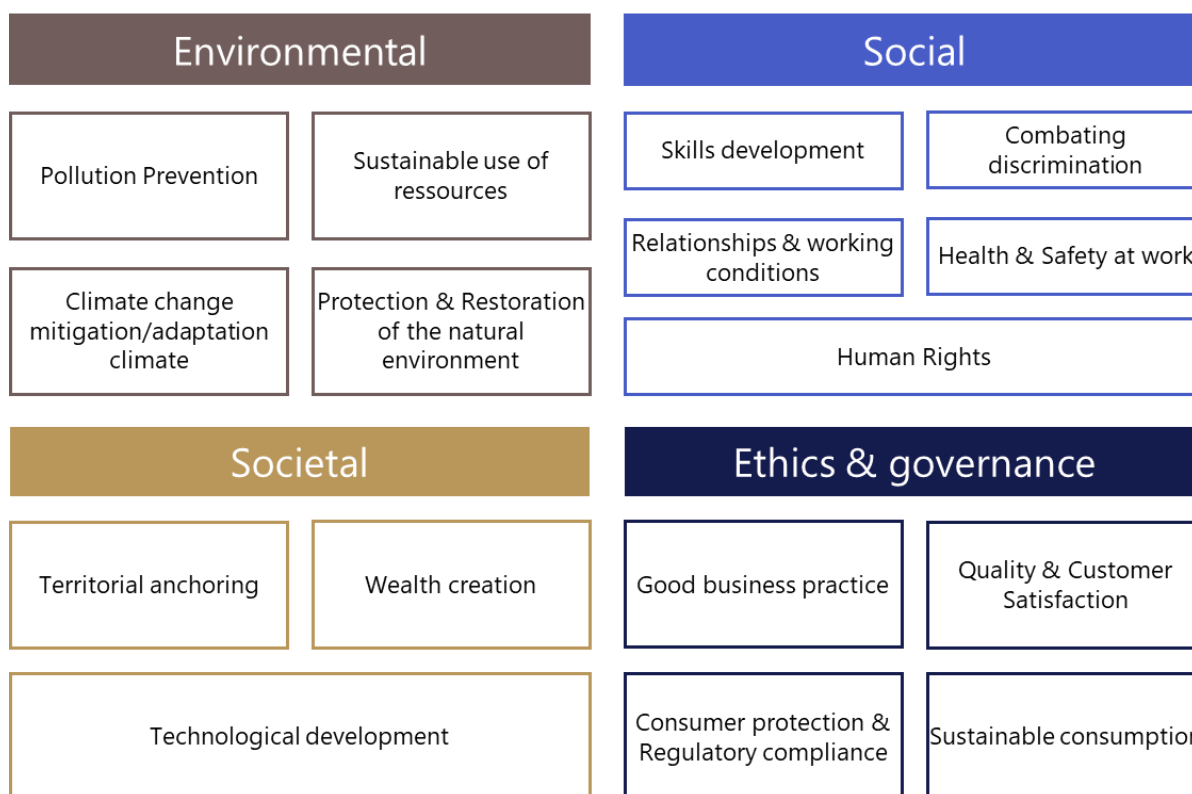


I. PREAMBLE

APL Data Center’s CSR challenges are based on 4 pillars :

- Environmental
- Social
- Societal
- Ethics & Governance

The 4 pillars of CSR at APL Data Center



These CSR issues are at the heart of APL Data Center's strategy, with a dual approach in all situations:

- Direct impact of APL Data Center due to its own operations
- APL Data Center's indirect impacts: how to meet the CSR challenges and expectations of our own customers and stakeholders.

It is within the framework of the "Environmental" and "Ethics & Governance" pillars of its CSR strategy that APL Data Center has drawn up and adopted this quality and environmental policy.

II. SCOPE OF QUALITY AND ENVIRONMENTAL POLICY

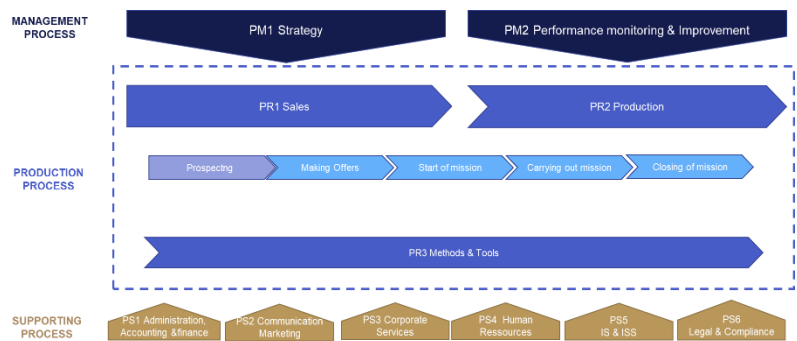
The quality and environmental policy applies both internally and to all the APL Data Center's activities.

- Project Management Assistance
- Design Project Management
- Project Management & Execution
- Turnkey
- Operation & Maintenance
- Training



This policy is also applied to all processes :

- Strategy Management
- Performance Monitoring & Improvement
- Sales
- Production
- Methods & Tools
- Administration, Accounting, Finance,
- Marketing et communication,
- Corporate Services,
- Information System,
- Legal & Compliance



III. QUALITY AND ENVIRONMENTAL POLICY PRIORITIES

In order to combine operational excellence and control of environmental impact, APL Data Center has defined the following priorities:

- Guarantee the satisfaction of our customers and the quality of our services,
- Develop and structure our activities to support our growth,
- Strengthen our attractiveness as an employer and the commitment of our employees,
- Control and reduce our own environmental impact and that of our data centers in line with our Organic Design mission,
- Strengthen our research and development work and drive eco-innovation in our business sector.

IV. WHAT PROCEDURES AND TOOLS ARE NEEDED TO IMPLEMENT THE QUALITY AND ENVIRONMENTAL POLICY?

IV.1. Defining the quality and environmental objectives to be achieved

Each year, APL Data Center sets itself objectives relating to quality and environmental issues to be achieved in line with the company's strategy and the priorities of this policy.

With regard to its direct impact, APL Data Center measures its greenhouse gas emissions every year and is taking steps to reduce its carbon footprint and control its carbon trajectory by taking into account its three main sources of Scope 3 emissions:

- Upstream leased assets
- Business travel
- Products and services purchased

With regard to its indirect impact, APL Data Center helps its customers to control their environmental impact in the field of responsible digital.

IV.2. Anticipating risk and monitoring

APL Data Center has defined a risk identity card for the company.

At least once a year, the company assesses its activities by process, with regard to the various risk families on the identity card, including environmental issues.



IV.3. Monitoring the action plan and KPIs

To achieve its objectives and control its risks, APL Data Center has set up an action plan for each process and associated KPIs to monitor its performance in terms of both quality and environmental control.

IV.4. Setting up an Integrated Management System

In 2020, APL Data Center embarked on a multi-standard ISO approach by setting up an Integrated Management System (IMS) within its organisation, integrating at the same level the needs and satisfaction of our customers (ISO 9001) as well as the control and reduction of our environmental impact (ISO 14001).

This IMS has been designed to be a tool for managing commitments of APL Data Center's quality and environmental challenges in the context of its direct impact.

APL Data Center's IMS is certified ISO 9001:2015 and ISO 14001:2015 by an independent inspection body, Dekra.

ISO 9001 specifies the requirements for a quality management system. This standard makes it possible to :



- Demonstrate its ability to consistently provide products and services that meet customer requirements and applicable legal and regulatory requirements
- Aim to increase customer satisfaction

ISO 14 001 specifies the requirements for an environmental management system. This standard makes it possible to :



- Improve its environmental performance by analysing and reducing its environmental impact
- Meet compliance obligations
- Achieve your environmental objectives

The principles of APL Data Center's Integrated Management System approach are as follows:

- Process approach
- Risk-based approach
- Continuous improvement

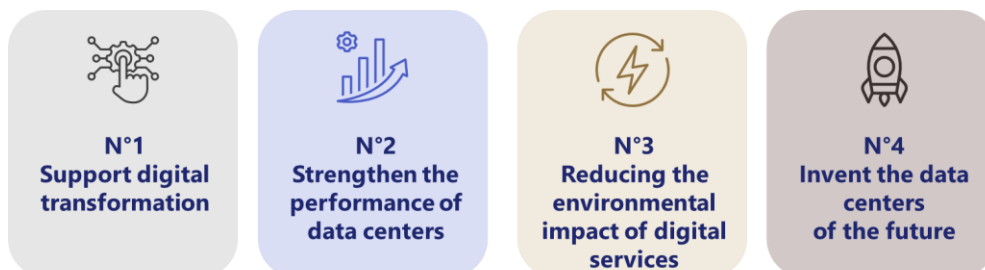
IV.5. Lab-by-APL – innovation for environmental performance

APL Data Center has been investing a percentage of its gross margin in research and development for several years.

The mission of Lab-by-APL is to provide our customers with 'sustainable innovation that reconciles digital and ecological transformation' and to spread the word, using the following two levers:

- Expertise & continuous improvement,
- Collaboration.

Each year, Lab-by-APL defines its roadmap to meet the challenges of the company's strategy and the priorities of this policy. This roadmap is structured along the following 4 axes:



IV.6. Digital Responsible BU

APL Data Center has set up a BU dedicated to responsible digital issues to meet the expectations of our stakeholders on sustainable development issues.

In this context, to help our stakeholders reduce the impact of their Data Centers, APL Data Center carries out :

- Assistance in choosing hosting solutions (data centre audit, hosting strategy, etc.)
- Design of efficient data centres, integrated into their environment
- Construction of resilient data centres with very low environmental impact on a project management or turnkey basis
- Maintenance in operational conditions and integration of best operating practices.

IV.7. Purchasing and control of suppliers

APL Data Center is mapping its purchases in order to :

- Analyse its purchases in an objective and structured way,
- Categorise them into direct and indirect purchases,
- Define a responsible purchasing policy based on the supplier's life cycle.

When contracting with its suppliers, APL Data Center will include :

- A supplier audit clause according to precisely defined procedures
- The supplier code of conduct
- Anti-corruption policy

On a case-by-case basis, and depending on the expectations of its customers, APL Data Center ensures that its own suppliers meet the expectations of the end customer.

Each year, APL Data Center evaluates its suppliers on the basis of five criteria:

- Quality of service
- Respect for deadlines
- Quality of reporting
- Improvement (proactive, technical)
- Involvement (team and participants)
- Environment (HSE)

IV.8. Awareness

An awareness-raising program on quality and environmental issues has been set up within APL Data Center for all employees. The aim is to enable all employees to regularly review best practices and methods with a view to anticipating and eliminating the risks associated with high-risk situations.