Quality, Health, Safety and Environment Policy

Data centers are at the core of digital development and play a key role in the digital transformation of our society. With the rise of digital uses, the development of Artificial Intelligence, and the exponential growth of supporting infrastructure, it is essential to fully integrate sustainability and performance challenges into the design, construction, and operation of data centers.

At APL Data Center, **our vision** is to reconcile digital development with environmental, social, societal, and economic requirements by reimagining the data center of the future.

This vision is embodied in our **Organic Design mission**: to design scalable, secure, efficient data centers in harmony with their environment. We strive to ensure that the increasing use of digital technologies and associated infrastructures remains **sustainably compatible with our planet and regional development**.
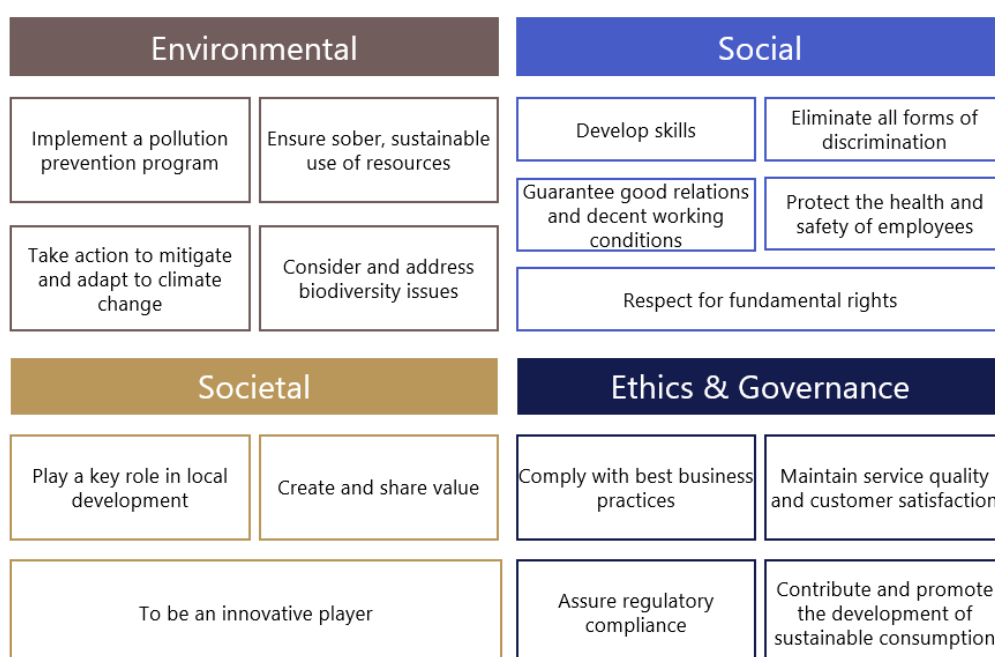
Our company values are rooted in a strong commitment to responsible and sustainable digital innovation. They guide all of our actions and shape our CSR approach:

- **Commit to** designing sustainable and high-performance data centers by integrating environmental and societal concerns.
- **Bring together** digital stakeholders around innovative and responsible solutions, fostering a collective and collaborative approach.
- **Dare to** innovate and push boundaries to anticipate future needs and deliver infrastructure suited to tomorrow's challenges.
- **Grow together** by evolving with our clients, partners, and employees in a dynamic of continuous improvement.
- **Cultivate** excellence by ensuring a high level of quality, safety, and efficiency in all our projects.

I. OUR STRATEGY

In this context, APL Data Center has adopted a **CSR strategy** that is both coherent and aligned with our strategic plan, regulatory requirements, the needs and expectations of our stakeholders, and industry best practices in the data center and construction sectors.

This CSR strategy is structured around four pillars and a dual approach: managing the **direct impacts** related to APL Data Center's operations while also addressing **indirect impacts** in response to the expectations of our clients and stakeholders.

Environmental		Social	
Implement a pollution prevention program	Ensure sober, sustainable use of resources	Develop skills	Eliminate all forms of discrimination
Take action to mitigate and adapt to climate change	Consider and address biodiversity issues	Guarantee good relations and decent working conditions	Protect the health and safety of employees
		Respect for fundamental rights	

Societal		Ethics & Governance	
Play a key role in local development	Create and share value	Comply with best business practices	Maintain service quality and customer satisfaction
To be an innovative player		Assure regulatory compliance	Contribute and promote the development of sustainable consumption

The implementation of this strategy is reflected in the definition of priority areas for APL Data Center:

- Developing and structuring our activities to support our growth
- Anticipating and assessing risks, both our own and those of our subcontractors, at every stage of our projects
- Strengthening our employer attractiveness and employee engagement
- Managing Health & Safety issues within APL Data Center's activities for both employees and subcontractors by fostering a recognized prevention culture
- Controlling and reducing our own environmental impacts as well as those related to data centers, in line with our Organic Design mission
- Strengthening our research & development efforts and taking a leading role in eco-innovation within our sector

II. OUR KEY QHSE COMMITMENTS

In this dynamic, our **Quality, Health, Safety, and Environment (QHSE) Policy** is a key driver for translating our CSR commitments into concrete action within our operational activities.

This policy is based on **key commitments** that enable us to ensure responsible and high-performing management of our activities:

II.1. Ensuring customer satisfaction and service quality

APL Data Center's Quality approach ensures regulatory compliance and the application of best practices through the formalization of processes, control of key project stages, risk and incident management, and regular audits. It is based on continuous improvement, fueled by feedback and satisfaction surveys.

Our commitments to Quality and operational performance:

— Understand and respond to the needs and expectations of our clients and stakeholders

— Ensure compliance with applicable legal and regulatory requirements

— Continuously improve our processes and performance to guarantee operational excellence and customer satisfaction

II.2. Providing a safe work environment and protecting the health of our employees

The health and well-being of our teams is a fundamental concern that requires constant attention, both individually and collectively. Senior management is fully committed to the development, deployment, and monitoring of preventive measures. In all circumstances, safety must be the top priority, without compromise, even in the face of profitability pressures.

Our commitments to Occupational Health & Safety:

— Identify and prevent occupational risks to ensure a safe and healthy working environment

— Implement actions to prevent workplace accidents and occupational illnesses

— Encourage active employee participation in the continuous improvement of health and safety

— Provide regular training and awareness sessions to foster a strong safety culture, enabling everyone to recognize and respond to hazardous situations

— Anticipate and effectively manage emergency situations (fires, incidents, crises, etc.)

For more details: Health & Safety Commitments and Roadmap »

II.3. Reducing our environmental footprint and preventing pollution

At APL Data Center, environmental concerns are a top priority and are taken into account at every level of the organization. Our commitment to reducing the carbon footprint of the data center sector is reflected in our expertise, developed since 2007, in energy efficiency and environmental impact mitigation for data centers, addressing stakeholder expectations regarding sustainability.

Our Environmental Commitments:

— Comply with environmental regulations and engage in a proactive approach to reducing our impacts

— Optimize natural resource management, reduce waste, and limit pollution

— Promote eco-responsible practices in the design and operation of data centers

— Protect biodiversity and minimize land artificialization in our projects

II.4. Embedding continuous improvement and social responsibility

To ensure the effective implementation of our quality, safety, and environmental commitments, APL Data Center adopts a structured and proactive approach. This approach is based on key principles that support continuous improvement and the coherent integration of QHSE issues across the company. We are committed to:

— Embedding our QHSE commitments into our governance and business strategies

— Defining measurable objectives and tracking progress using performance indicators

— Engaging and training our teams to foster commitment and skill development

— Encouraging innovation and collaboration with stakeholders to promote responsible digital development

— Conducting regular audits to evaluate and improve our integrated management system

III. OUR INTEGRATED MANAGEMENT SYSTEM

Since 2020, APL Data Center has been implementing an **Integrated Management System (IMS)** to manage its quality (ISO 9001:2015) and environmental (ISO 14001:2015) commitments. Certified by Bureau Veritas, this IMS is designed to ensure customer satisfaction and reduce the company's environmental impact.

ISO 9001 specifies the requirements for a quality management system. This standard enables an organization to:

- o Demonstrate its ability to consistently provide products and services that meet customer requirements as well as applicable legal and regulatory requirements
- o Enhance customer satisfaction

ISO 14001 specifies the requirements for an environmental management system. This standard helps an organization to:

- o Improve its environmental performance, particularly by analyzing and reducing its environmental impacts
- o Comply with environmental obligations
- o Achieve its environmental objectives

The core principles of APL Data Center's Integrated Management System are:

— Process-based approach

— Risk-based approach

— Continuous improvement

III.1. Process-based approach

Our Quality, Health, Safety, and Environment (QHSE) policy is based on a **process-based approach**, ensuring structured and effective management of our activities while promoting consistency and optimization across our operations.

This policy applies to all of APL Data Center's activities.

— Project Management Assistance

— Design Project Management

— Project Management & Execution

— Turnkey

— Operation & Maintenance

— Training

This policy also applies to all processes:

— Strategy Management

— Performance Monitoring & Improvement

— Operational marketing and business

— Operations

— Expertise and Innovation

— Administration, Accounting and Finance

— Communication,

— General Services,

— Information System,

— Legal and Compliance

III.2. Risk-based approach

APL Data Center has defined a **corporate risk identity map**. At least once a year, the company evaluates its activities by process in relation to the various risk categories identified in the map, including environmental and health & safety issues.

APL Data Center also keeps its **Single Occupational Risk Assessment** (Document Unique d'Évaluation des Risques Professionnels - DUERP) up to date to address all Health & Safety concerns.

Lastly, APL Data Center regularly updates the **environmental impact assessment** of its operational activities.

III.3. Continuous improvement and innovation

Finally, we are committed to a **continuous improvement process** by regularly analyzing our results, leveraging feedback, and implementing corrective and preventive actions to sustainably enhance our QHSE performance.

This dynamic is also closely aligned with our Research & Development (R&D) activities - our engine for innovation - enabling us to anticipate technological, environmental, and regulatory changes. For several years, APL Data Center has invested a percentage of its gross margin in R&D.

The mission of the **Lab-by-APL** is to provide operational teams and our clients with "sustainable innovation that reconciles digital and ecological transformation" and to promote it, relying on two key levers:

— Expertise & continuous improvement

— Collaboration

Each year, the Lab-by-APL defines its roadmap to address the strategic challenges of the company and the priority areas of this policy. This roadmap is structured around the following four pillars:

N°1
Support digital transformation

N°2
Strengthen the performance of data centers

N°3
Reducing the environmental impact of digital services

N°4
Invent the data centers of the future

IV. OUR RESPONSIBLE PURCHASING APPROACH

APL Data Center **maps its purchasing activities** in order to:

— Objectively and systematically analyze its purchases

— Categorize them into direct and indirect purchases

— Define a responsible purchasing policy based on the supplier lifecycle

When entering into contracts with its suppliers, APL Data Center includes:

— A supplier audit clause with clearly defined terms

— The supplier code of conduct

— APL Data Center's anti-bribery policy

On a case-by-case basis, and depending on client requirements, APL Data Center ensures that its suppliers comply with the expectations of the end customer.

Each year, APL Data Center conducts a **supplier performance review** based on six key criteria:

— Quality of service

— Compliance with deadlines

— Quality of reporting

— Improvement (technical proposals, innovation)

— Involvement (of the team and stakeholders)

— Environmental performance

V. EMPLOYEE TRAINING

A training and awareness program is implemented at APL Data Center for all employees. It aims to ensure that everyone understands:

— The QHSE policy and its associated objectives

— The results of process risk analyses, single occupational risk analysis (DUERP), and environmental impact assessments

— The importance of everyone's contribution to the effective implementation of compliance measures and continuous improvement of the IMS

VI. REGULAROTY MONITORING AND COMPLIANCE

APL Data Center carries out several regulatory monitoring activities:

— **Business-specific regulatory monitoring** led by each department director for their area of responsibility

— **HSE regulatory monitoring for APL Data Center's activities through Red Online**, overseen by the Legal, CSR & Compliance Department

— **HSE regulatory monitoring on behalf of our clients** (upon request) **via Red Online**, managed by HSE regulation experts

APL Data Center rigorously tracks applicable regulations within its scope and updates its compliance assessment at least once a year.