

SOCIAL POLICY

FOREWORD

APL Data Center is attached, in the conduct of its business, to respect for the law, regulation, national and international conventions currently in effect, and to the best practices in corporate social responsibilities.

Within APL Data Center, the social policy is based on a profound commitment to fundamental values that guide all our actions and decisions. These values are :

➤ **Get involved**

We are putting all of our energy and our responsibility into serving our customers and building the most efficient, durable and environmentally friendly data center.

➤ **Gather**

We know that together we are stronger. We enjoy working as a team, sharing our knowledge and celebrating our collective successes.

➤ **Dare**

Autonomy, trust et initiative guide ours actions. We are looking for something new, and we love taking on challenges.

➤ **Growing together**

We are building a work environment with humility, openness, and mutual support, enabling everyone – clients, colleagues, and partners - to grow.

➤ **Cultivating Excellence**

We are proud of our expertise. We are committed to continuously improving it and always staying at the forefront of innovation.

These values form a common foundation upon which our vision of a thriving organization that respects our teams is built.

We are convinced that the sustainable development of our company can only be achieved in respect of our ethical principles and actively promoting practices that place people at the heart of our activities. Our social policy therefore focuses on creating an inclusive and supportive

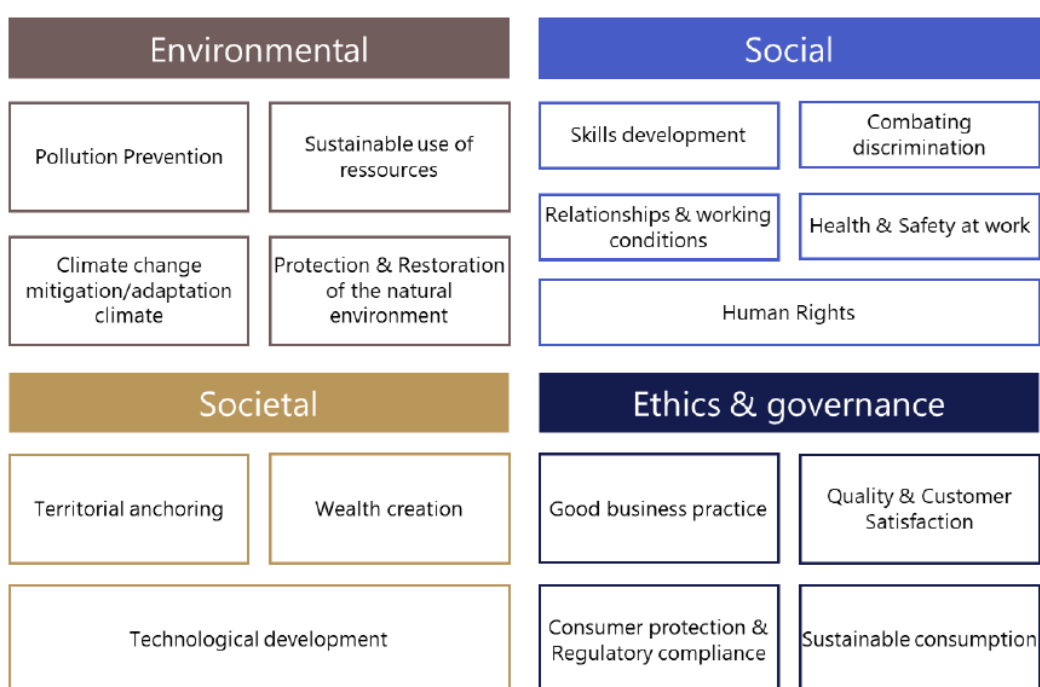
working environment, where every employee has the opportunity to flourish both professionally and personally.

It's with this mindset that we move forward, aware that the well-being of our staff and our commitment to our social responsibilities are inextricably linked to our sustainability, our long-term development and our corporate culture

1. Preamble

The goals RSE d'APL Data Center revolve around 4 pillars :

- Environmental
- Social
- Societal
- Ethical & Governance



These goals RSE are at the heart of the APL Data Center's strategy with, in every situation, a double approval :

- Direct impacts of APL Data Center because of his own operation
- Indirect impacts of APL Data Center for answer to RSE's goals and to expectations of our own clients and their stakeholder.
- It is within the framework of the social pillar, which focuses on its human resources, that APL Data Centre has drawn up and adopted this social policy.

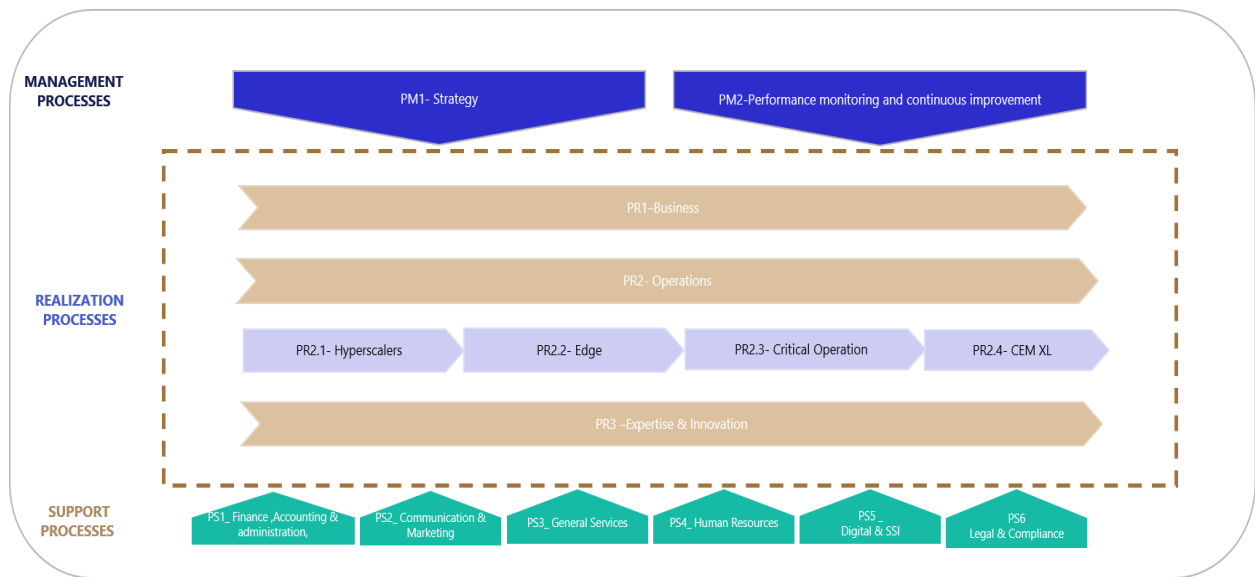
2. Scope of the social Policy

The social policy applies both to the organisation's internal needs and to all APL Data Center's activities:



The policy also applies to all processes:

- Strategy management,
- Performance and continuous improvement,
- Retail,
- Production,
- Methods and tools,
- Administration, finance and accountancy,
- Marketing et communication,
- General Services,
- Information systems,
- Legal & Compliance.



3. The priority areas of social policy

APL Data Centre has set out the following priorities:

- Developing staff skills,
- Combating all forms of discrimination,
- Ensuring high-quality working relationships and conditions,
- Guaranteeing a healthy and safe working environment by,
- Respecting human rights.

- **Develop staff skills:**

At the heart of our social policy, the development of our employees' skills is a top priority. To this end, we conduct biannual staff appraisals which enable us to carry out an in-depth assessment of each team member's skills, performance and potential for development. These appraisals are designed to identify and encourage the development of our talent, by aligning their career aspirations with the company's objectives.

Furthermore, we have placed a strong emphasis on training, particularly our in-house training program known as 'Learning by APL', which lies at the heart of our approach to the professional development of our staff.

Through "Learning by APL," our experts help develop and lead technical and cross-functional training programs that enable our employees to become operational quickly and advance their skills in specific areas, thereby strengthening our competitiveness and our ability to innovate.

APL Data Center is committed to investing in "human capital," recognizing that our success depends on the expertise, commitment, and well-being of our teams.

By fostering an environment conducive to continuous learning and personal and professional development, we are building a resilient company ready to meet the challenges of tomorrow.

APL Data Center is also committed to achieving a 20% increase in average training hours by 2030.

- **Combating all forms of discrimination :**

We are firmly committed to eradicating all forms of discrimination. We have a zero-tolerance policy toward any discrimination based on age, gender, origin, religion, sexual orientation, or any other criterion unrelated to professional merit.

In particular, we pay close attention to gender equality in technical fields, an area where parity is essential but often not a reality.

We are committed to actively promoting women's access to these positions and supporting their career advancement on an equal footing with their male counterparts.

Beyond one-off initiatives, our approach extends to all aspects of an employee's career journey at APL Data Center. Starting with recruitment, we ensure fair and transparent processes. Training, performance evaluations, promotions, and departures are managed with the highest level of integrity and fairness to ensure that every employee, regardless of their identity, is treated with respect and fairness.

We continuously strive to create an inclusive work environment where everyone, regardless of their differences, feels not only respected and valued, but also fully integrated into our professional community.

By doing so, we are building a corporate culture that reflects our values. This is the environment in which our teams can truly thrive and contribute to achieving APL Data Center's objectives.

We also aim to increase the number of employees trained in discrimination awareness by 15% by 2030.

- **Ensuring the quality of workplace relationships and working conditions :**

At APL Data Center, we are firmly committed to fostering a work environment where fairness and respect are at the heart of our daily operations.

We understand that the quality of workplace relationships is fundamental to the well-being and productivity of our teams. We also take concrete steps to continuously improve them. This includes designing workspaces to be both functional and pleasant, investing in technologies that facilitate and secure work and certain internal procedures, and covering a portion of gym memberships to meet our employees' needs.

Recognizing the importance of work-life balance, we offer flexible options such as remote work, a "right to disconnect" policy, and a parental leave policy.

We are also committed to organizing two annual campaigns promoting work-life balance, as well as conducting an employee survey on quality of life and working conditions.

- **Ensuring a Healthy and Safe Work Environment (Health and Safety):**

The health and safety of our employees are at the heart of our priorities at APL Data Center.

We are committed to maintaining a safe and healthy work environment that adheres to the strictest health and safety standards.

We invest in regular, mandatory training for all levels of the company, aimed at raising our employees' awareness of best safety practices.

These sessions are designed to cover the specific aspects of each position: electrical certifications, construction site safety, and workplace first aid training.

In addition to training, we reinforce safety through health and safety audits and periodic updates to our equipment and protocols.

We also foster a culture of safety in which every employee plays a key role in preventing accidents.

At APL Data Center, we take all necessary measures to ensure that every employee benefits from a work environment that not only complies with regulations but also actively protects their health and safety, so that everyone returns home safe and sound every day.

Our objective is therefore to achieve zero serious workplace accidents.

- **Human Rights :**

- APL Data Center is committed to complying with national and international human rights standards, and in particular:
- The Universal Declaration of Human Rights,
- ILO conventions, provided they do not conflict with national law,
- The 10 principles of the United Nations Global Compact.

We are firmly committed to respecting and promoting human rights in all aspects of our operations. Our commitment to the dignity, privacy, and diversity of our employees is essential. We strictly enforce a non-discrimination policy, ensuring that all employment decisions are based on merit and competence, regardless of ethnic origin, gender, sexual orientation, religion, or any other personal characteristic.

We strongly condemn all forms of forced or compulsory labor, as well as child labor. All our processes comply with the law to prevent such practices and ensure adherence to ethical standards.

Regarding compensation and working hours, we ensure that our policies and practices comply with applicable laws and reflect fair compensation for the work performed. We also ensure that work schedules do not negatively impact our employees' well-being, promoting a healthy work-life balance.

We recognize and support our employees' right to freedom of association. Every employee is free to join unions or other forms of collective organizations without fear of repercussions. We are committed to engaging in open and respectful dialogue with employee representatives to discuss various topics.

By embedding these fundamental principles into our corporate culture, we strive to build an organization where respect for human rights is at the heart of everything we do. At APL Data Center, the protection and promotion of fundamental rights are not only a legal obligation but an ethical responsibility that we take very seriously and uphold every day.

4. What Procedures and Tools Support Quality and Environmental Policy?

4.1 Defining Social Objectives

Each year, APL Data Center sets objectives related to quality and environmental issues, in line with the company's strategy. As part of this process, APL Data Center defines annual KPIs aligned with the strategic directions of its social policy. These KPIs play a fundamental role in this system. They enable us to measure the effectiveness of our HR initiatives and track progress toward the defined strategic objectives. Among these KPIs, we regularly analyze metrics such as the turnover rate, employee satisfaction rate, number of hires, training satisfaction rate, and many others. These metrics provide us with valuable data to assess the impact of our HR policies and adjust our strategies accordingly.

4.2 Risk Prevention and Management

At least once a year, APL Data Center conducts and/or updates its health and safety risk assessment through the DUERP.

As part of our ongoing commitment to ensuring the health and safety of our employees in the workplace, each new employee is provided with a Personal Protective Equipment (PPE) kit upon joining the company.

This kit, carefully tailored to the specific requirements of their position and work environment, includes all essential items for their protection, such as a hard hat with a chin strap, protective gloves, safety goggles, work boots or shoes suitable for construction sites, earplugs, and other specific equipment necessary for the prevention of occupational hazards.

4.3 Monitoring the Action Plan and KPIs

To achieve its objectives and manage risks, Data Center implements an action plan and associated KPIs to track the progress of its social performance.

4.4 People Management

At the heart of our corporate strategy, human resources management is orchestrated from the highest level of governance, ensuring that our HR vision and HR practices are fully aligned with our overall strategic objectives. The Strategic Committee (COSTRAT) plays a crucial role in this process; it develops the overall strategy and defines the long-term vision across several areas, including human resources, thereby aligning HR objectives with APL Data Center's aspirations and challenges.

For more detailed and specific human resources management, an HR Executive Committee (COMPEOPLE) is also in place. This committee, dedicated exclusively to HR issues, addresses key topics and makes the necessary decisions regarding structural projects. The HR Executive Committee is essential for implementing the strategy defined by COSTRAT, ensuring that HR initiatives effectively support the company's needs and priorities.

Finally, the operational aspects of HR management are handled on an ongoing basis through monthly HR meetings with each business unit director. These regular meetings make it possible to monitor the progress of both women and men, adjust action plans, and resolve operational issues in real time.

They foster smooth communication and effective coordination between HR and operational teams, ensuring that the HR strategy is applied consistently and tailored to the specific needs of each business unit.

This HR management structure enables our company to remain agile and responsive to market challenges while supporting the company's significant growth and the well-being of our employees.

Finally, to ensure effective and measurable management of our human resources strategies, our company uses an Integrated Management System (IMS). This system improves communication between different functions and ensures consistency in the implementation of HR policies and practices across the organization. Thanks to the IMS, we can also integrate the principles of sustainability and social responsibility into our HR operations, thereby reinforcing our commitment to ethical and transparent practices.

4.5. Strategic Directions for Training

Building on the momentum of previous years, APL continues its strong growth and is accelerating its international expansion. To that end, the Impact 27 strategic plan aims to position the group as Europe's leading pure player in data center engineering.

With people remaining at the heart of the company's strategy, training remains an essential tool for supporting the Group's hyper-growth, strengthening collective performance, and identifying the key skills of tomorrow.

The year 2025 built on the initiatives undertaken in recent years: professionalizing teams, enhancing technical and managerial skills, and consolidating the corporate culture around health and safety, quality, and the expertise specific to the data center industry.

Against the backdrop of European expansion, the Group intends to reach new milestones in 2026. The challenge is to ensure overall alignment between the Group's strategic ambitions and the teams' skills development needs in order to offer them the best possible career paths

- **Health & Safety :**

Because Health & Safety are at the heart of our business and operations, the APL Group continues to develop its culture in this area.

The goal for 2026 is to go well beyond legal requirements by continuing to implement specific awareness-raising initiatives (road risks, musculoskeletal disorders, construction site safety, and regulatory compliance) and by further embedding the health and safety culture into every career path.

Employees will receive training in risk prevention and management, and a Safety Week focused on a specific theme will help cement this culture of prevention and shared vigilance throughout the entire Group

- **Leadership & Management Culture :**

Against a backdrop of hyper-growth, APL sought to make the development of managerial skills a key strategic lever for fostering engagement, cohesion, and performance.

Training programs focused on public speaking, team leadership, and co-development will help create a common and shared managerial culture, fostering cohesion and alignment with the Group's strategy.

At the same time, specific support programs—including individual coaching—will continue to be offered, fostering the development of confidence, clarity in strategic vision, and adaptation to the challenges of organizational transformation.

APL aims to support and train the next generation of housekeepers, equipping them to unite teams around our values and corporate culture, in pursuit of operational excellence and team fulfillment.

- **Professional Growth :**

The professional development of our employees is the cornerstone of our HR policy.

By 2026, APL aims to offer each and every employee the best possible career path, aligned with the Group's strategic needs while taking into account the professional aspirations of our teams.

Key technical and certification tracks (Uptime, PMP, ITIL, ISO, etc.) will be continued and diversified to ensure a high level of expertise in the fields of consulting, design, and data center construction. These certifications serve as a mark of credibility, particularly with our clients,

and strengthen our ability to meet the demands of increasingly challenging international markets.

At the same time, the “Learning by APL” program will continue to be developed. It is based on leveraging internal knowledge: subject matter experts will be called upon to lead internal technical training sessions, as well as webinars and awareness-raising sessions.

This collaborative approach will help embed a culture of continuous learning and knowledge sharing. In addition, sessions on cross-functional areas (HR, H&S, legal, finance, etc.) will continue to complement our existing training offerings.

Finally, special emphasis will be placed on mastering digital and collaborative tools to streamline remote work and strengthen synergies between projects and our various locations.

- **Globalization :**

As our business expands rapidly in Europe, the international dimension is becoming a key priority for APL. This is, in fact, the goal of our strategic plan: Impact 27.

Accordingly, the Group aims to support this transformation by developing employees’ language and intercultural skills.

Language training programs will be expanded, with modules tailored to specific business needs: technical, sales, or managerial.

The goal is for every employee to be able to communicate with ease in an international setting.

Finally, thematic modules on international practices will round out this program:

- Project management according to European standards, particularly Anglo-Saxon ones;
- International law and technical contracts;
- Environmental standards and global regulations applicable to data centers;
- Intercultural training to support our European expansion.

This international expansion will help consolidate APL’s position as a leading European player, capable of operating to the highest industry standards.

The year 2026 marked a key milestone for APL, which continues on its growth trajectory and pursues its ambition to become the leading European pure player in the field of data center engineering. To support this momentum, training is more essential than ever as a strategic pillar, ensuring team engagement, skill development, and performance. Now more than ever, the values “Growing Together” and “Cultivating Excellence” take on their full meaning and guide the Group’s daily training strategy by promoting learning, high standards, and personal fulfillment for everyone.

Through these guiding principles, APL reaffirms its mission and ambition: to offer every employee the best possible career, aligned with the Group’s strategic priorities.

4.5 Employee Satisfaction Survey

At APL Data Center, we are committed to valuing feedback from our employees, as it is an essential pillar for the continuous development of our work environment.

With this in mind, we conduct an annual satisfaction survey across the entire company.

This initiative allows us to gather employees' opinions, perceptions, and suggestions on various aspects of their professional lives, ranging from:

- Safety culture
- Perception of the company's image
- Organization and work environment,
- Employee training and onboarding,
- Information, employee engagement, and internal communication,
- Support from cross-functional departments: General Services, IT, Internal Communications, etc.

The results provide us with valuable insights to identify areas for improvement, build on our strengths, and address our teams' concerns.

Next, targeted action plans are developed and implemented to effectively address the needs expressed, thereby ensuring the continuous improvement of our organizational climate and employee satisfaction.

This survey demonstrates our commitment to building an inclusive, respectful, and motivating workplace where every voice counts and contributes to our shared success.