Sustainability Policy

February 2025

Policy Purpose

Fleet Data Centers ("Fleet" or the "Company") developed this Sustainability Policy ("Policy") to articulate the guiding principles for Fleet's Sustainability Program ("Program"). This includes a defined vision, objectives, and governance structure. This Policy applies to all Fleet operations.

Key Definitions

- Sustainability: The ability of an organization to meet its present needs and those of its various stakeholders without compromising its ability to thrive over the long term.
- ESG: A collection of environmental, social, and governance topics that measure relevant components of sustainability for an organization.
- Impact: The positive or negative effect an organization has or could have on the economy, environment, and people including on their human rights.

Sustainability Vision

Fleet, as a part of the Tract Capital Management ("Tract Capital") family, embraces Tract Capital's commitment to seriously consider its impact on the environment and society, and to maintain socially responsible behavior throughout its development activity and relationships with stakeholders.

In full alignment with Tract Capital's vision, Fleet is committed to conducting its business in an environmentally and socially responsible manner, considering the interests of its various stakeholders and the impact of its operations on the environment and communities in which it operates. By prioritizing long-term sustainability, Fleet aims to maintain a profitable and responsible business while developing and managing best-in-class data centers. Sustainability at Fleet encompasses environmental, social, and governance (ESG) factors that influence operational resilience and support the goals and long-term success of our customers. Our commitment extends beyond our own operations to our supply chain, and we will work to hold our suppliers to the same expectations we have for ourselves when it comes to ESG factors.

Environmental: Fleet recognizes its responsibility to be a good steward of the environment and the importance of integrating sustainability throughout the lifecycle of our data center projects, from engineering and design to operations. The Company is committed to minimizing environmental impact through responsible construction, effective energy management, responsible water stewardship, and transparent carbon reporting. Fleet fosters a culture of environmental responsibility among its team members and continuously innovates to meet customer and regulatory sustainability standards. Additionally, Fleet is dedicated to maintaining the highest standards of accuracy and reliability in ESG-related data reporting.

Social: As a provider of engineering, construction, design, and ongoing operational services, Fleet prioritizes a strong safety culture to mitigate risks and prevent incidents. Committed to employee health, safety, and well-being, Fleet fosters a safe work environment that supports professional growth and engagement. The Company values workplace equity, cultivating a culture of respect and fair compensation for equal work. Additionally, Fleet embraces its role as a responsible corporate citizen through meaningful community engagement, support for human rights in our business and throughout our supply chain and efforts to advance digital inclusion.

Governance: Fleet has established a governance structure for its Sustainability Program, detailed in the "Operationalizing Sustainability" section below. The Company is committed to upholding the highest ethical standards, fostering transparency, and demonstrating accountability across all operations. As Fleet continues to grow, this governance structure will be evaluated and refined as necessary to maintain its effectiveness.

Impact

As a provider of mega-scale data centers and infrastructure, Fleet acknowledges its environmental impact across key areas, including energy consumption, carbon emissions, water usage, and land and biodiversity management. As a growing organization with plans for expansion, Fleet is committed to integrating sustainability principles into its design from the beginning. Fleet will adhere to all applicable environmental regulations and align with applicable industry best practices while continuously seeking innovative solutions to mitigate its environmental footprint.

Sustainability Topics and Definitions

Based on the industry in which Fleet operates, the known impacts of its business, and the interests of its key stakeholders, the Company has identified the sustainability-related topics that it believes are most important for its business. Below is a list of these key topics, along with Fleet's high-level objectives for each.

Topic Category	Topic	Definitions and Objectives
Environmental	Energy Management	**Definition:** Energy efficiency, management, and/or procurement of renewable energy for the Company's operations.
		Objective: Fleet seeks to reduce overall energy usage and incorporate the use of renewable and carbon-free energy in its operations where appropriate.
Environmental	Carbon Emissions and Reporting	**Definition:** Greenhouse gas (GHG) emissions reduction and management within the Company's operations as well as transparent reporting to stakeholders.
		Objective: Fleet seeks to accurately measure, actively manage, and reduce carbon emissions, providing transparent reporting on emissions to stakeholders while assessing pathways towards net neutrality.
Environmental	Water and Wastewater Management	**Definition:** Management and reduction of water consumption, water withdrawals, and water discharges across the Company's operations.
		Objective: Fleet seeks to measure, manage, and optimize water use, prioritize reuse, and drive innovation in sustainable water management practices.
Environmental	Sustainable Building	**Definition:** Responsible and sustainable construction practices and design strategies that minimize environmental impacts of both construction and building operations.
		Objective: Fleet seeks to adopt construction practices and design solutions to mitigate the negative impacts of construction and operation of our facilities while maintaining structural integrity and safety.
Social	Employee Development and Engagement	**Definition:** Efforts to provide training and development opportunities for employees, and enabling employee participation in activities that contribute to the Company's values.
		Objective: Fleet seeks to prioritize workforce development by offering training and development opportunities as well as fostering a culture of continuous improvement through regular employee engagement activities.

Topic Category	Topic	Definitions and Objectives
Social	Employee Health and Safety	**Definition:** Efforts to promote the health and safety of the Company's employees, including prevention of injuries and illness related to the Company's operations as well as employee mental health and well-being.
		Objective: Fleet seeks to foster a culture of safety and well-being by implementing proactive risk mitigation strategies, investing in employee health and safety, and continuously monitoring and improving workplace safety practices.
Social	Diversity, Equity, and Inclusion	**Definition:** Commitment to an inclusive and equitable workforce that respects diverse perspectives, fosters belonging, and pays equally for work of equal value.
		Objective: Fleet seeks to strengthen diversity, equity, and inclusion in its workforce by fostering an inclusive workplace culture, promoting belonging and respect, and providing fair compensation.
Social	Responsible Corporate Citizenship	**Definition:** Company engagement with local communities and philanthropic causes.
		Objective: Fleet seeks to be a responsible corporate citizen by (a) actively engaging with the local communities in which it operates to foster workforce development, support local business growth, and help create thriving communities, (b) promoting respect for human rights, and (c) working to advance digital inclusion.
Governance	Business Ethics and Compliance	**Definition:** Promotion of ethical business conduct throughout the Company's operations to prevent bribery, corruption, anti-competitive behavior, discrimination, harassment, conflicts of interest, and violations of human rights.
		Objective: Fleet seeks to operate with the highest level of integrity, transparency, and adherence to all applicable laws and regulations and avoid financial or reputational risk to the Company.
Governance	Data Privacy	**Definition:** Security, protection, and management related to sensitive, confidential, and/or proprietary data collected, retained, or used during Company operations.
		Objective: Fleet seeks to maintain strong data privacy practices by implementing and maintaining a robust data privacy program that prioritizes respect for individual privacy rights and transparency as to our collection and use of personal data, and that conforms to evolving global data protection requirements.
Governance	Cybersecurity	**Definition:** Proactive efforts to identify, manage, mitigate, and respond to internal or external cyber-related threats.
		Objective: Fleet seeks to effectively manage and mitigate cybersecurity threats by deploying and maintaining an advanced program and systems that conform to recognized industry standards.
Governance	Reporting and Transparency	**Definition:** Transparent reporting aligned with recognized ESG standards and frameworks to stakeholders.
		Objective: Fleet seeks to transparently report on ESG, providing stakeholders with accurate data aligned with accepted ESG frameworks, while ensuring strong corporate oversight to maintain integrity in its reporting.

Operationalizing Sustainability

To support its ongoing sustainability efforts, Fleet has established a formal governance structure for its Sustainability Program. The Program is led by the Company's ESG Leader with the support of the President of Fleet and senior management. Fleet expects all Company employees to support its sustainability-related activities.

Materiality Assessment

Every year, the ESG Leader will organize and conduct an intentional review to determine or confirm those sustainability topics that are most relevant for Fleet's business and its stakeholders, and that represent the Company's most significant impacts on the economy, environment, and people ("Material Topics"). In designing the assessment, the ESG Leader will consult the guidance provided by the Global Reporting Initiative ("GRI") and other recognized standard setting bodies. Fleet will complete a full materiality assessment periodically. In developing the universe of topics to be considered, the ESG Leader will consider topics generally regarded as important by customers and others in the data center industry, as well as those included in the GRI standards, the relevant SASB standards, and other recognized sustainability or "ESG" standards. The ESG Leader will report the results of each materiality review and assessment to senior management and other relevant stakeholders as deemed appropriate. In addition, the ESG Leader will maintain a register of the Material Topics.

Goals for Program Maturity and Performance

For each Material Topic, the ESG Leader, will work with internal stakeholders to establish (a) goals relating to the topic, including level of maturity, (b) metrics that will be used to track the Company's performance, (c) where possible, quantitative targets for performance, and (d) owners and due dates.

In considering program goals and maturity for each Material Topic, the ESG Leader will consider:

- The need for appropriate policies and procedures
- Assessment of risks specific to Fleet's business
- Assignment of roles and responsibilities
- Training and communications needs
- Monitoring and auditing requirements
- The need for regular management reviews.

In developing metrics, the ESG Leader will consider metrics that are included in leading voluntary reporting standards, including GRI and the SASB Standards, in addition to metrics regularly requested by customers and other stakeholders. The ESG Leader will regularly report to senior management on the goals selected, targets, and performance against these targets.

Reporting

Internal Reporting. The ESG Leader will report periodically to senior management and other stakeholders as appropriate on the state of the Company's Program, including the identified Material Topics, the status and maturity of the Company's various management systems relating to sustainability, and the Company's performance on identified sustainability metrics.

External Reporting. The Company is committed to transparency with respect to its sustainability efforts, and as such intends to provide its stakeholders with relevant information regarding its Program and performance.

Amendments and Waivers

The Company reserves the right to interpret, administer, change, or modify this Policy at any time, with or without notice. Changes will only be valid if approved in writing by the President of Fleet or another official to whom such authority has been delegated in writing by the President.

Administration of the Policy

The Company's ESG Leader is responsible for the administration of this Policy. Please direct questions regarding this policy or sustainability at Fleet to the ESG Leader.