



An Aligned Data Centers Company

GREEN FINANCE FRAMEWORK

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ODATA Brasil LTDA, an Aligned Data Centers company headquartered in São Paulo, Brazil is a data center provider offering scalable, reliable, and flexible infrastructure across Latin America along with its affiliates (“ODATA” or “Company”). The Company meets the increasing demands for innovative, scalable and efficient data center solutions from major cloud and Artificial Intelligence providers as well as large-scale enterprises. ODATA’s data center solutions support the continued development of digital infrastructure in Latin America.

ODATA’s Approach to Sustainability

ODATA and Aligned, its parent company, are committed to integrating Environmental, Social, and Governance (ESG) principles across all of their operations. Sustainability lies at the heart of our business strategy, and we are dedicated to addressing the key sustainability challenges related to data center infrastructure, energy consumption, and resource management. Our approach aligns with global best practices, focusing on creating long-term value for our stakeholders, the communities in which we operate, and the world.

To us, being a sustainable data center operation is about committing to sustainable practices and principles across every facet of ODATA: from the partners we choose to work with, to the way we structure our supply chain, to the way we approach designing, constructing, and operating our data centers.

ODATA implements a comprehensive sustainability strategy based on a double materiality assessment, evaluating the impact of its activities on both financial performance as well as the environment and/or society. This process helps us set priorities across environmental, social, and governance dimensions.

Our **Environmental efforts** focus on key areas, including the efficient and responsible use of natural resources to promote a circular economy:

- **Energy:** Substantially increase the share of renewable energy in organization's mix, while enhancing overall efficiency
- **Climate Change:** Integrate climate change mitigation and adaptation efforts into Company policies, risk assessment, strategy and plans
- **Sustainable Buildings:** Promote sustainable infrastructure and initiatives that enhance resource efficiency, accelerate the adoption of clean and environmentallyfriendly technologies, and prioritize resource conservation

- **Water:** Employ a waterless design thanks to a standard closed-loop system within our facilities
- **Pathway to Zero Waste:** Waste diversion activities across data center sites, eliminating landfill-bound waste generation
- **Pathway to Sustainable Construction:** Use of environmentally responsible construction materials that have low environmental impact where appropriate. Greencertification across various sites, which evaluates the environmental sustainability, health & wellness, and resilience of commercial buildings and portfolios.
- **Efficiency:** Our efficient air-cooling technology, Delta³, captures and removes heat at the source, rather than inefficiently pushing cold air into the data hall. This hot aisle containment strategy allows data center environments to scale vertically and horizontally without stranding capacity like legacy data center cooling systems.

Our **Social efforts** emphasize our commitment to ensuring a safe and healthy workplace while supporting the development of our employees and communities:

- **Health, Safety & Well-being:** Protect labor rights and promote safe and secure working environments.
- **Employee Development, Inclusion & Engagement:** Promote a culture of growth, diversity, respect, and collaboration, ensuring employees feel valued and empowered to thrive.
- **Local Communities:** Engage in community outreach programs and support local development initiatives.

Our **Governance efforts** focus on conducting business transparently and ethically with all stakeholders:

- **Ethics & Integrity:** Prevent corruption and bribery by fostering a culture of ethics, transparency, and strict compliance with regulations.
- **Cybersecurity, Privacy & Data Protection:** Maintain high standards of cybersecurity and data protection, adhering to industry best practices and regulations.
- **Responsible Value Chain:** Ensure ESG compliance throughout the value chain by emphasizing human rights, monitoring environmental and labor standards, promoting sustainable practices, and sharing best practices.

Innovation permeates all our departments, serving as a key driver for building a sustainable future and is a fundamental aspect of our Company culture. By fostering a strong culture of innovation, we empower our teams to develop sustainable solutions that address today's challenges and contribute to a more resilient tomorrow.

ODATA integrates ESG principles throughout the entire lifecycle of its data centers, encompassing site selection, design, construction, and operations. This commitment was first demonstrated with its SP01 data center, which achieved LEED Gold certification, positioning ODATA as one of the few data center operators in Brazil to earn this distinction at the time.

By 2023, ODATA had reached approximately eighty five percent (85%) renewable energy coverage across its data centers in Latin America. The Company also offers its customers renewable energy options through Power Purchase Agreements (PPAs), Renewable Energy Certificates (RECs), and renewable energy self-production in Brazil. To reinforce its commitment to innovation and sustainability, since 2023, ODATA invests in selfproduction of renewable energy, through minority stakes in Brazilian wind farms, making it one of the first data center companies globally to generate its own clean energy, thus enabling the Company to provide one hundred percent (100%) renewable energy to its customers.

Excellent water management is key for ODATA. The Company implements a closed-loop water system without evaporative towers in almost all its data centers, resulting in virtually zero water consumption. An exception is the BG01 facility in Colombia, where ODATA uses a free cooling system to leverage the local cold climate.

Climate action is a priority for ODATA. The Company annually calculates its Scope 1, Scope 2, and Scope 3 carbon emissions, with independent third-party verification. ODATA's climate commitments include a Carbon Net Zero Plan and participating in the iMasons Climate Accord (ICA), an initiative aimed at achieving carbon neutrality within the technology sector.

On the Social front, ODATA recognizes that employees and value chain partners are our most valuable assets. Safety is ODATA's top priority, with a corporate team establishing core safety protocols and local teams managing compliance with local requirements, culture, and expectations. The organization collaborates with its entire value chain to align with international safety standards and best practices, with safety-related goals linked to employee compensation.

To support employee health and well-being, the Company launched the “ODATA + Ativa” program, promoting emotional, physical, and social wellness. This program includes workshops on stress management, nutrition, physical activity, and access to wellness platforms, as well as online psychological and medical assistance, empowering employees to make healthier choices and improve their work-life balance.

ODATA also runs a Social Program, "ODATA Social," built on three (3) main pillars:

1. **Youth Development and Training:** ODATA is dedicated to preparing young people for the job market, with a focus on developing skills and knowledge for the data center industry. This is achieved through partnerships with organizations focused on youth development, as well as a scholarship program to further support education and professional growth
2. **Strengthening the Communities We Serve:** The Company works to align the expectations of local communities surrounding its data centers, fostering mutually beneficial relationships. ODATA's initiatives include volunteerism, donation campaigns, and partnerships aimed at enhancing local development.
3. **Enablement of Constructive & Transparent Feedback:** The organization proactively engages with stakeholders, creating opportunities for constructive dialogue and enhancing long-term relationships. For example, ODATA has implemented an ESG channel, allowing stakeholders to submit suggestions, complaints, and inquiries, thereby encouraging open communication and collaboration.

ODATA seeks to cultivate and maintain constructive and positive relationships with local communities in the countries where it operates. Some countries in LATAM require particular attention due to their various communities' strong demands for high governance standards, sustainability, and compensation for potential impacts. To appropriately address these expectations and mitigate associated risks, ODATA collaborates with local resources specialized in socio-environmental assessments. These partnerships allow for a comprehensive strategy that includes project scope analysis, identification of relevant stakeholders (such as local authorities, NGOs, and residents), and continuous dialogue with affected communities.

Under Governance, ODATA's Ethics and Integrity Program is anchored in a comprehensive Code of Ethics, with all employees receiving training in ethics and integrity. The Company maintains an Ethics Channel, managed by an independent third-party provider, accessible to internal and external stakeholders for confidential reporting of any Code of Conduct violations or suggestions. This external channel also enables anonymous feedback, fostering a culture of transparency and accountability.

ODATA's Ethics Committee reviews and addresses all reported cases, ensuring thorough follow-up. Additionally, the Company's Non-Retaliation Policy protects individuals who raise concerns, safeguarding them from any form of retaliation or adverse treatment.

ODATA has established a robust **ESG governance** structure guided by a **Global ESG Policy**, featuring an **ESG Committee** composed of business leaders from various departments. This Committee is responsible for implementing ESG strategies and providing regular updates to the CEO. It focuses on four key pillars: (1) Foster ESG Awareness and Engagement, (2) Integrate ESG into Business and Department Strategies, (3) Review and Prioritize ESG Initiatives, and (4) Discuss ESG Trends and Innovations.

Rationale for Establishing the Green Finance Framework

We¹ established this Green Finance Framework to further align our financings with our sustainability strategy and commitments. We intend to execute financings pursuant to the Green Finance Framework that may include, among others, securities (including bonds or asset-backed securities) and loans ("Green Finance Instruments"). Green Finance Instruments can be secured or unsecured and offered in registered or unregistered transactions. For any issuance of asset-backed securities ("ABS") or similar products, either the proceeds will be allocated by us to finance and/or refinance expenditures meeting the criteria set forth in this Framework (a "Secured Standard Green Finance Instrument" and, together with unsecured green bonds or loans, "Standard Green Instruments") or the collateral underlying the ABS will align with the eligibility criteria set forth in this Framework (a "Secured Green Collateral Instrument"). For any issuance of ABS, we will specify whether a transaction is a Secured Green Standard Instrument or a Secured Green Collateral Instrument.

This Green Finance Framework aims to provide transparency and disclosure of our Green Finance Instruments to our investors and lenders, following industry best market practices and subject to future market development and expectations. We continuously monitor and evaluate the market and potential financing alternatives to ensure the most efficient management of our financing strategy aligned with our sustainability strategy.

¹ References to 'us,' 'we,' the 'Company' or similar phrases refer to ODATA or the applicable affiliate executing a transaction pursuant to this Green Finance Framework, as the context requires. ODATA Brasil LTDA will have operational control over the applicable entity while the Green Finance Instrument is outstanding.

This Green Finance Framework is intended to be a high-level, multi-purpose explanation of how our financings will relate to our sustainability strategy. Investors should refer to the relevant documentation of each transaction for further details.

Green Finance Framework

This Green Finance Framework outlines the methodology and associated principles for classifying a financing as a Green Finance Instrument, including eligibility criteria and verification processes. Green Finance Instruments are expected to align with the Green Bond Principles² or Green Loan Principles³, in each case as in effect as of the date hereof.

Use of Proceeds

We intend to allocate an amount equal to the net proceeds of any Green Finance Instrument to finance and/or refinance, in whole or in part, new or existing projects ("Eligible Green Projects") from the Eligible Green Project category listed below. For Secured Green Collateral Instruments, the collateral underlying such ABS or similar product will comprise Eligible Green Projects.

² The Green Bond Principles are a voluntary framework outlining best practices when issuing bonds serving environmental purposes through global guidelines and recommendations that promote transparency and disclosure. These guidelines are promulgated by an organization of issuers, underwriters and investors with the International Capital Markets Association acting as secretariat.

³ The Green Loan Principles comprise voluntary recommended guidelines published by the Loan Market Association, Asia Pacific Loan Market Association and Loan Syndication and Trading Association, to be applied by market participants on a deal-by-deal basis depending on the underlying characteristics of the transaction.

Eligible Green Project Category	Eligible Green Project Category Description
Energy Efficiency	<ol style="list-style-type: none"> Expenditures related to the acquisition, design, construction, maintenance and operations of data centers meeting any of the following criteria: <ul style="list-style-type: none"> An "as designed"⁴ power usage effectiveness ratio ("PUE") of 1.35 or below for data center infrastructure that uses waterbased cooling technologies; or An "as designed"⁵ PUE of 1.45 or below for data center infrastructure that uses water-free cooling technologies Expenditures related to enhancements, retrofits, refurbishments, improvements, upgrades or other changes to the design or operations of existing data centers reasonably expected to reduce PUE by at least two percent (2%) per annum
Renewable Energy	<p>Expenditures and investments related to renewable energy generation and procurement, such as:</p> <ul style="list-style-type: none"> The installation, maintenance and operation of solar, wind (onshore and offshore) or associated battery storage infrastructure; Investments in or acquisition of renewable power (solar, wind and run-of-river hydropower) developers, operators or providers; Procurement of renewable energy (solar, wind and hydropower, biomass) pursuant to power offtake, lease or service agreements (with terms no less than 5 years) including physical or virtual renewable energy power purchase agreements (PPAs); Procurement of Green-e[®] Energy certified renewable energy certificates (RECs) with traceability to the specific underlying renewable energy project; or Procurement of low-carbon or zero emissions fuels such as hydrotreated vegetable oil, renewable diesel, and other biofuels⁶ for use in on-site backup power generators

⁴ "As designed" PUE is determined by the design annual average PUE calculated by ODATA's engineers during the design and construction of new data center infrastructure.

⁵ "As designed" PUE is determined by the design annual average PUE calculated by ODATA's engineers during the design and construction of new data center infrastructure.

⁶ Such fuels will utilize renewable and non-fossil fuel-based inputs, with resulting lifecycle emissions intensity expected to be 50% to 75% less than conventional fossil fuel alternative.

Sustainable Buildings

Expenditures related to the design, construction, operation, and maintenance of buildings that have or are expected to have one or more of the below certifications:

- a. Leadership in Energy and Environmental Design ("LEED") rated Gold or Platinum;
- b. Building Research Establishment Environmental Assessment Method ("BREEAM") rated Excellent or higher;
- c. Excellence in Design for Greater Efficiencies ("EDGE") certification Level 2 (EDGE Advanced) and Level 3 (Zero Carbon);
- d. Green Building Initiative ("GBI") Green Globes Building Certification of at least three globes;
- e. The standards of one or more generally comparable global or country specific green building certification standards and certified at a level comparable to the certification levels specified in clauses (a)–(d) above

Process for Evaluation and Selection

Appropriate personnel from our sustainability and finance teams shall be responsible for evaluating whether projects qualify as Eligible Green Projects based on the Eligibility Criteria outlined herein and determining whether expenditures in respect of Eligible Green Projects will be allocated proceeds from Green Finance Instruments. Selected personnel will assess the environmental and social risks associated with deemed Eligible Green Projects and determine appropriate mitigating measures, including, where relevant, obtaining independent technical advisor reports for new constructions.

We expect to allocate proceeds from Green Finance Instruments only to expenditures in respect of Eligible Green Projects constituting (i) capital expenditures, (ii) expenditures in respect of agreements meeting the criteria set forth in the third bullet of the Renewable Energy project category set forth above to the extent entered into subsequent to or within two years of the Closing Date of the applicable Green Finance Instrument; and (iii) to the extent made subsequent to or within two years of the Closing Date of the applicable Green Finance Instrument, operating expenditures. Expenditures must also comply with all applicable laws and regulations, and our policies and guidelines.

Management of Proceeds

Standard Green Finance Instruments

We intend to allocate an amount not less than the total net proceeds from outstanding Green Finance Instruments to Eligible Green Projects. The Borrower will establish and/or maintain an internal tracking system to monitor and account that an amount equal to the net proceeds of the Green Finance Instruments has been allocated to Eligible Green Projects.

We may hold and/or invest the balance of any net proceeds not yet allocated in accordance with our customary treasury practices, including held in the form of cash and cash equivalents or in the form of instruments backed by the full faith and credit of the U.S. Government, obligations of governmental agencies and highly rated short-term commercial paper.

The transaction documentation for each Standard Green Finance Instrument is expected to specify:

- The extent to which payments in respect of the applicable Green Finance Instruments will be made from our general accounts or linked to the performance of any projects financed with or comprising Eligible Green Projects;
- The extent to which proceeds will be held in segregated accounts; and
- The time period by which we intend to allocate an amount equal to the net proceeds of such Green Finance Instruments: with the expectation that all proceeds would be allocated not later than three years subsequent to disbursement.

Secured Green Collateral Instruments

We expect that the net proceeds from each issuance of Secured Green Collateral Instruments will be allocated on or around the transaction date to Eligible Green Projects. The transaction documents for each Secured Green Collateral Instrument are expected to specify the extent to which payments in respect of such instrument are linked to performance of the underlying collateral and whether any amounts received by the issuer of such instrument are capable of being re-invested in further collateral comprised of Eligible Green Projects.

Reporting

Allocation Reporting

In respect of Standard Green Finance Instruments⁷ we intend to make and keep readily available information on the allocation of net proceeds to Eligible Green Projects. For financings in which transaction documents include contractual restrictions requiring that proceeds be used for specific identified Eligible Green Projects (e.g., project finance green loans), we expect to provide this information only to extent of any material change in the eligibility of such projects. For other financings, we expect to provide such information to investors annually (until full allocation⁸) and thereafter in the event of a material development. Such report is expected to include information on the approximate amount of refinancing of existing projects.

Impact Reporting

Where feasible, in respect of Standard Green Finance Instruments, we intend to report on the sustainability impacts of Eligible Green Projects. These may be supplemented by qualitative and/or case-study reports on outcomes and impacts of the projects funded. Where relevant, information may be provided on data reporting and impact assessment methodologies, to increase transparency.

Eligible Green Project Category	Impact Metrics
Energy Efficiency	<ul style="list-style-type: none">● Average PUE of Eligible Green Projects● Gallons of water saved from cooling solutions (m³)● Potential and/or actual GHG savings from Eligible Green Projects (tons of CO²e)
Renewable Energy	<ul style="list-style-type: none">● GHG savings through use of renewable energy (tons of CO²e)● Electricity consumption from renewable sources (GWh and/or consumption share in % terms), split between type of renewable source

⁷ Similar reporting is not required in respect of Secured Green Collateral Instruments, which are expected to be fully allocated to Eligible Green Projects as of the date of such transaction.

⁸ To the extent a given Green Finance Instrument includes a revolving credit component, such reporting would continue through maturity as to the revolving component.

Sustainable Buildings	<ul style="list-style-type: none"> ● Green building certification and level obtained ● Electricity consumption (MWh) saved against a standard building ● Potential and/or actual GHG savings from Eligible Green Projects (tons of CO²e)
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The extent to which reporting is made public will be disclosed on a deal-by-deal basis.

External Review and Verification

Pre-Issuance Review

In connection with this Green Finance Framework, we worked with an outside consultant with recognized expertise in environmental, social and governance research and analysis to (i) assess our definition of Eligible Green Projects and processes for alignment with the Green Bond Principles and Green Loan Principles, (in each case, as in effect as of the date hereof), and (ii) obtain a Second Party Opinion ("SPO") from such consultant in respect of compliance with such criteria.

Verification

We intend to specify in the transaction documents for each Green Finance Instrument the extent to which reporting provided thereunder will be subject to third-party review or verification.

Amendments to this Framework

We may review this Green Finance Framework from time to time, including its alignment to updated versions of the relevant principles as and when they are released, with the aim of adhering to best practices in the market.

The updates, if not minor in nature, will be subject to the prior approval of any qualified provider of Second Party Opinions. The updated Green Finance Framework, if any, will be published on our website and will replace this Green Finance Framework as to any Green Finance Instruments subsequently entered.

Disclaimer

This Green Finance Framework contains certain forward-looking statements that reflect the ODATA's management's current views with respect to future events and financial and operational performance of the Company. These forward-looking statements are based on the Company's current expectations and projections about future events. Because these forward-looking statements are subject to risks and uncertainties, actual future

results or performance may differ materially from those expressed in or implied by these statements due to any number of different factors, many of which are beyond the ability of the Company to control or estimate precisely. You are cautioned not to place undue reliance on the forward-looking statements (as well as information and opinions) contained herein, which are made only as of the date of this document and are subject to change without notice. The Company does not undertake any obligation or responsibility to release any updates or revisions to any forward-looking statements and/or information to reflect events or circumstances after the date of publication of this Green Finance Framework. Our use of the term “material” in this Green Finance Framework relates to materiality to our stakeholders in their analysis of our performance on environmental, social, or governance topics and does not imply materiality as such term is used for purposes of the securities laws of any jurisdiction. This Green Finance Framework represents current Company policy and intent and is not intended to, nor can it be relied on, to create legal relations, rights or obligations. This document is not intended to be and should not be construed as providing legal or financial advice. The information contained in this Green Finance Framework does not purport to be comprehensive and, unless differently specified in this Green Finance Framework, has not been independently verified by any independent third party. This document is not intended to be and should not be construed as providing legal or financial advice. This Green Finance Framework does not constitute a recommendation regarding any securities of the Company or any subsidiary or affiliate of the Company. This Green Finance Framework is not, does not constitute, nor it should be interpreted as, or form part of, any offer or invitation to underwrite, subscribe for or otherwise acquire or dispose of, any solicitation of any offer to underwrite, subscribe for or otherwise acquire or dispose of, any securities issued or to be issued by the Company or any of its subsidiaries in the U.S. or any other jurisdiction. Any decision to buy or invest in securities shall be made solely and exclusively on the basis of the information set out in the pertinent prospectus or equivalent or related documentation filed or otherwise made available to prospective investors by the Company or its subsidiaries. Thus, this Green Finance Framework does not constitute a prospectus or other offering document and no securities have been or will be registered under the U.S. Securities Act of 1933, as amended, or the securities laws of any state of the U.S. or any other jurisdiction. Neither this document nor any other related material may be distributed or published in any jurisdiction in which it is unlawful to do so, except under circumstances that will result in compliance with any applicable laws and regulations. Persons into whose possession such documents may come must inform themselves about, and observe, any applicable restrictions on distribution. Under no circumstances will the Company or its affiliates, representatives, directors, officers and/or employees have any liability whatsoever (in negligence or otherwise) for any loss or damage howsoever arising from any use of this document or its contents or otherwise arising in connection with the document.



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