



An Aligned Data Centers Company

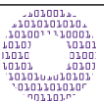
EHS POLICY

UNIT: ALL UNITS

LOCATION: ALL LOCATIONS

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1 PURPOSE

The purpose of this document is to make visible the principles and commitments that guide ODATA's activities regarding the interaction with the environment and the respect for people.

2 AUDIENCE

This procedure applies to all ODATA sites and to all shareholders, customers, employees, suppliers, business partners, local community, and public agencies.

3 REFERENCES

- ISO 14001
- ISO 45001
- OSHA Standards and Rules (General Industry and Construction)
- ISO 9001
- ISO/IEC 20000-1
- ISO/IEC 27001
- Responsible Investment Policy – ESG (“*Pátria Investimentos Ltda.*”)
- Federal Constitution of Brazil of 1988
- National Environmental Policy – Law 6,938/81
- Conama (National Council for the Environment – Decree 99.274/90)
- CLT (Consolidation of Labor Laws – Decree Law 5,452 of 1943)
- Applicable Regulatory Standards
- Single regulatory decree 1072 of 2015 (Colombia)
- Resolution 0312 of 2019 (Colombia)

4 DEFINITIONS

- **Root Cause Analysis:** Methodology for identifying the cause that originated all the developments that led to an incident or undesired event.
- **EHS:** Environment, Health and Safety.
- **Occupational Disease:** Any medical disorder caused by exposure to chemical, physical, biological or ergonomic factors at workplace.

- **Environmental Impact:** Change in the environment (positive or negative) caused by human activity.
- **Incidents:** An unplanned work-related event that adversely affects the performance of a task.
- **Environment:** Set of physical, biological, and chemical factors that surround living beings, influencing them and being influenced by them.
- **Climate Change:** Changes in climate resulting from the increase in the concentration of greenhouse gases in the atmosphere.
- **Stakeholders:** Set of all stakeholders that make up ODATA's relationships (shareholders, employees, customers, service providers, visitors, community, and public agencies).
- **Natural Resources:** Elements available in nature that can be consumed for human activities.
- **Non-renewable Natural Resources:** Natural resources that cannot readily be replaced in natural ways at a rate consistent with the rate at which they are consumed.
- **Solid Waste:** Material, substance, object, or good discarded resulting from human activities in society, whose final destination is proceeded, is proposed to proceed or is obliged to proceed, in solid or semi-solid states, as well as gases contained in containers and liquids whose particularities make its release into the public sewerage system or water bodies unfeasible or require technically or economically unfeasible solutions in view of the best available technology.
- **Occupational Health:** Promotion and protection of workers' health, contributing to their quality of life and physical, mental, and social well-being, favoring productivity and responsible economic development.
- **Workplace Safety:** Set of measures and actions that are adopted to prevent and reduce work incidents and occupational diseases and protect the integrity of the worker.

5 RESPONSIBILITIES AND AUTHORITIES

5.1 TOP MANAGEMENT

It is the responsibility of the Top Management:

- Provide guidelines and approve the EHS Policy in accordance with the expectations of our stakeholders and ODATA's strategic direction.
- Sign and disseminate the EHS Policy, ensuring that knowledge regarding the policy is disseminated to all employees involved and ensuring their participation.
- Assign and communicate EHS responsibilities.
- Ensure EHS risk management and the establishment of an annual EHS work plan.
- Lead and promote EHS initiatives focused on continuous improvement.
- Ensure and provide the necessary resources to comply with applicable regulatory requirements and adequate EHS management.
- Ensure accountability for the effectiveness of the management system by conducting critical analysis.

5.2 EMPLOYEES

It is the responsibility of the employees:

- Comply with the commitments, principles and other EHS documentation necessary to carry out their activities.
- Assist in monitoring EHS performance indicators and executing an action plan to achieve planned results.
- Comply with environmental, health and safety legislation.
- Seek comprehensive care for your health and provide clear, true, and complete information about their health status.
- Inform the employer or contractor in advance about the hazards and risks identified in their workplace.
- Participate in EHS training activities promoted by the organization.
- Collaborate in the dissemination of the EHS policy to its stakeholders and contribute to people's awareness.

5.3 EHS

It is the responsibility of the EHS department:

- Communicate and ensure the use of EHS Policy in the organization.
- Carry out the transfer of knowledge regarding EHS themes to employees and other stakeholders that are part of the scope.
- Ensure the monitoring of EHS performance indicators and the execution of the action plan to achieve the planned results.
- Review and keep the EHS Policy updated in conjunction with Senior Management.

6 DESCRIPTION

6.1 ENVIRONMENT, HEALTH AND SAFETY POLICY

Our activities are guided by the commitment to generate value for stakeholders at all stages of design, construction and operation, as well as in administrative area activities, enabling investment solutions and services in infrastructure that contribute to socio-economic and environmental development of the regions where we operate.

In this way, and we are committed to:

- The protection and promotion of the health and safety of our employees, suppliers, customers, and visitors, guaranteeing their physical and mental integrity; and
- The protection, prevention and mitigation of environmental impact and the promotion of sustainable development.

By means of:

- Compliance with regulations, contracts, and applicable standards.
- Management and reduction of risks, through their identification, assessment of controls and continuous management.
- Continuous improvement of EHS actions.
- Allocation of resources necessary for the proper management of EHS.
- Efficient use of ecosystem services and natural resources.
- Monitoring EHS performance through indicators and audits.
- Communication, dissemination, training and awareness of employees and partners about their responsibilities and best EHS practices.
- Integration of EHS aspects into business decisions.

The principles of this Policy are:

ENVIRONMENT

- Efficient use of natural resources and reduced dependence on non-renewable natural resources.
- Promotion of adaptation and mitigation measures to Climate Change.
- Carrying out waste management in line with the concepts of reduction, reuse, and recycling.
- Engagement of employees so that everyone acts in accordance with the best practices for protecting the environment.

- Identification, assessment and management of environmental aspects, impacts and risks arising from our activities, minimizing negative impacts on our operations and on the surrounding communities.

HEALTH AND SAFETY

- Promotion of a culture of incident and occupational disease prevention, and compliance with occupational health and safety requirements.
- Collaboration to maintain a healthy and safe work environment, articulation with stakeholders and intervention in working conditions that may cause work accidents or occupational diseases.
- Preparation, control, communication and incident response plan, root cause analysis and sharing of lessons learned and best practices.

6.2 COMMUNICATION

ODATA undertakes to:

- Promote the disclosure of this Policy, as well as the EHS guidelines and procedures to stakeholders, seeking to ensure their compliance and everyone's awareness.
- Maintain communication channels with stakeholders on aspects of this Policy.
- Ensure the safety of the communities where it operates, as well as keep them informed about the impacts and risks arising from its activities.

6.3 TERM, CHANGES AND UPDATES

This Policy will enter into force on the date of its publication and will be revised annually or when there is any change that affects the environment and/or the health and safety of workers.

6.4 ASSINATURA / FIRMA / SIGNATURE

São Paulo, 19 de Setembro de 2023.

Ricardo Alário
CEO Latam

Carlos Alberto Forero
COO Latam

