

Sustainability, Social and Corporate Responsibility Policy

Effective Date: March 1, 2023

1. Purpose & Implementation

Purpose and Implementation: The purpose of this Sustainability, Social and Corporate Responsibility Policy (the “Policy”) is to state certain key sustainability and corporate responsibility policy commitments that Rowan Green Data LLC and its affiliates (“Rowan”) seeks to achieve, and which guide its approach to its business activities. This Policy is based on the goals of driving value and minimizing harm through good governance practices, sound management structures, employee relations, local community impact and legal compliance. Rowan shall implement and interpret this Policy in accordance with local laws and regulations, recognizing that it may need to be modified and considered on a case-by-case basis to comply with relevant local requirements and practices, as well as scaled accordingly to its resources.

2. Environmental Commitments

2.1 Climate Change Initiatives

- A. Energy Transition: Rowan is committed to global climate goals and working toward a transition to net zero by 2050, consistent with the Paris Agreement to limit global warming temperatures to 1.5°C as compared to pre-industrial levels.
- B. Carbon Reduction Initiatives: Rowan’s business is fundamentally focused on building infrastructure, businesses and solutions that support the transition to a low carbon economy and seeks to implement carbon emissions reduction initiatives in connection with this focus.
- C. Climate Risk Management: Rowan shall strive to engage in various measures designed to identify material climate risks to projects and the development of the same, assess such risk exposure, and implement appropriate mitigation measures where necessary.

2.2 **Compliance and Due Diligence.** Rowan shall comply with all applicable environmental laws, regulations and permits in the jurisdictions throughout the United States in which it operates. Rowan shall, where necessary and applicable, undertake ESG due diligence to ensure compliance with this Policy. For environmental matters, this may include climate change risk, greenhouse gas emissions reductions, biodiversity outcomes, water use, and waste management.

- 2.3 **Environmental Sustainability.** Rowan is committed to conducting its business and operations in an environmentally responsible way, with efforts to minimize any negative outcomes on the environment as required by applicable environmental laws and regulations and with the intent to undertake any activities that would irrevocably harm the environment. Rowan will monitor environmental outcomes and, if potential negative outcomes on the environment are identified, develop, and implement a plan to monitor any mitigation measures implemented. Key environmental outcomes may include, but are not limited to, deforestation, flora and fauna, waste, water use/stress, releases of emissions and pollutants, and land degradation and desertification. Rowan is committed to striving to maintain sustainable land and water management practices, conducting its operations in a manner that mitigates the risk of adverse outcomes on endangered or threatened species, and to minimizing adverse outcomes on air, soil, land, and water, as required by applicable environmental laws and regulations in the jurisdictions in which it operates, to include, where and to the extent applicable, international standards.
- 2.4 **Biodiversity.** Rowan recognizes the potential for infrastructure assets to impact biodiversity and ecosystems. To minimize or avoid such outcomes, Rowan will integrate biodiversity considerations into project development. Rowan shall ensure compliance with applicable laws and regulations to conserve, protect, and mitigate any harm to biodiverse areas and locations. This may include: (i) screening activities to ensure minimal impacts on or avoidance of natural capital, including biodiversity and the protection of threatened and endangered species; (ii) where applicable, avoidance or reduction of deforestation; (iii) implementation of pollution protection measures; (iv) measures to conserve and protect water resources; and (v) where possible, encouragement of circular economies to minimize impact on natural resources. This Biodiversity Protection Policy applies to the Rowan’s operational sites whether owned or leased or managed in, or adjacent to, protected areas or areas of high biodiversity value as determined in early-stage project development and site selection due diligence; standards such as the Integrated Biodiversity Assessment Tool Alliance may be used in the screening process.
- 2.5 **Waste and Circular Economy.** Rowan shall consider ways to reduce, reuse, and recycle, thereby decreasing waste and conserving natural resources. Rowan shall develop and implement a waste management plan with a goal of ensuring maximum reuse of its operational equipment and end-of-life recycling of such equipment. Rowan shall ensure any toxic or hazardous wastes are stored and disposed of in accordance with applicable laws, and regulations and agree to integrate measures to minimize waste. Such waste management activities shall be reflected in the construction, development, and operation and end-of-life planning of the Rowan’s projects, operating budgets, or other official project documentation.

3. Social Commitments.

3.1 **Monitoring Integration with International Responsible Business Guidance.** Rowan shall make efforts to integrate the Ten Principles of the United Nations Global Compact (the “UNGC”), across its business functions and monitor its progress in this integration. The Company shall strive to integrate the Ten Principles of the UNGC related to human rights, labour, environment, and anti-corruption into its practices, as well as to improve monitoring of its progress in this integration. Rowan shall consider the mechanisms in place for the submission of grievances or concerns by those potentially impacted by its activities, which are in addition to, and do not preclude access to, any other judicial system provided for by applicable law or contract. Rowan shall strive to improve monitoring of its progress in integrating the guidance outlined in this section.

3.2 **Human Rights.** Rowan recognizes a responsibility to respect human rights under the United Nations Guiding Principles on Business and Human Rights, has created a Human Rights Policy in connection therewith and Rowan shall abide by and implement such Human Rights Policy. Also, Rowan shall comply with all applicable laws and respect internationally recognized human rights wherever it operates. Rowan shall seek to identify, mitigate, and oppose all forms of slavery, forced or compulsory labor, and child labor within its organization and supply chains, and will implement processes to do so. Rowan has created the Modern Slavery Policy and incorporated it into its contractor selection process in connection with Rowan’s efforts above.

3.3 **Diversity, Equity, and Inclusion.**

- A. Equal Employment: Rowan shall be guided by principles of equality of opportunity and treatment in employment and shall not discriminate against its workers with respect to employment or occupation on protected grounds such as race, color, sex, religion, nationality, ethnicity, or other legally protected characteristics.
- B. Anti-Discrimination Policies: Rowan shall be committed to the elimination of unlawful discrimination in respect of employment and occupation. Rowan shall not tolerate workplace harassment, abuse, discrimination, violence, or retaliation for good faith reporting of such behaviour. Rowan maintains anti-discrimination, anti-harassment, and anti-retaliation policies appropriate for its jurisdictions, which are documented in its Employee Handbook. Any employee who witnesses discrimination, harassment, other inappropriate behavior, or retaliation, must immediately report the behavior to their manager, or another manager whom the employee feels comfortable approaching.
- C. Diversity: Rowan shall embrace and promote diversity, including but not limited to gender, ethnicity, culture, and other individual differences, to foster a workforce that reflects the diversity of its local communities.
- D. Pay Ratio: Rowan shall strive to perform an annual assessment of gender pay equity among its employees, including all forms of remuneration, and/or other diversity metrics as requested by its applicable Boards of Directors.
- E. Diversity Statistics: Rowan shall monitor employee diversity statistics and report those annually to its applicable Boards of Directors, or as otherwise requested.

3.4 Anti-Corruption.

- A. Prohibition: Rowan shall not directly or indirectly offer, promise, give, or demand a bribe or other undue advantage to obtain or retain business or other improper advantage. Rowan shall also resist the solicitation of bribes and extortion. Rowan shall work against corruption in all its forms, including extortion and bribery. It shall develop or maintain appropriate internal policies, controls, training, ethics and compliance programs or other measures for the purpose of preventing and detecting illegal bribery, corruption, fraud, bribe solicitation and extortion.
- B. Compliance and Whistleblowing: Rowan shall maintain a whistleblowing mechanism whereby employees may report concerns related to the Company's Code of Conduct or other internal policies. The whistleblower policy shall be documented in the Company's Employee Handbook. Rowan shall not retaliate against employees for reporting potential violations in good faith. Rowan will establish a method for the confidential reporting any issues or concerns by employees or members of the public.

3.5 **Business Alignment with Social Principles.** Rowan shall avoid exposure to or investment in enterprises with a direct and material involvement in cluster chemical, biological or nuclear weapons, tobacco, alcohol, pornography, gambling, animal cruelty, or activities that violate human rights.

4. Community Relations

4.1 **Stakeholder Engagement.** Rowan shall engage with clients and stakeholders on its initiatives, projects, products, and services, and seek feedback on relevant ESG issues as needed. Rowan shall comply with reporting and public notice requirements under relevant environmental laws and regulations. Rowan shall strive to engage with local communities in which its business operations have a significant impact and strive to measure contributions to local economies. When applicable, Rowan shall use efforts to consult with Indigenous people who are present in a geographic area that may be impacted by its business operations. The scope and scale of such consultation shall be proportionate to the scope and scale of known potential risks that may negatively impact such peoples and communities.

4.2 **Recognition of Cultural Heritage.** Rowan shall recognize the inherent value of all cultures and cultural heritage sites and treat them with respect. For the purposes of this Policy, the terms "cultural heritage resources" and "cultural heritage sites" are defined to include tangible property and sites having archaeological (prehistoric), paleontological, historical, cultural, artistic, and religious values, as well as unique natural environmental features that embody cultural values. Rowan shall comply with all relevant laws and regulations concerning legally protected cultural heritage sites and resources. Rowan shall either comply with any existing applicable law, rules or regulations or alternatively, have appropriate procedures in place (proportionate to the nature and context of its operations, as well as the scope and scale of any potential negative impact) to address the inadvertent discovery of cultural heritage sites or resources and appropriate mitigation measures with respect to the same.

4.3 Environmental Justice Communities

- A. "Environmental Justice" is defined, in the United States as "the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to

the development, implementation and enforcement of environmental laws, regulations and policies.”¹

- B. “Environmental Justice Communities” generally refers to minority, low-income, tribal, and other vulnerable communities which disproportionately experience negative health and/or environmental outcomes.² Certain states within the U.S. may have unique definitions of “Environmental Justice Communities” or “disadvantaged communities.”
 - C. Identification: Rowan shall seek to identify Environmental Justice Communities during the initial stages of project development through the utilization of available information and available tools (e.g., census screen, EJScreen, and the Environmental Justice Index at the federal level; state environmental mapping tools where available).
 - D. Equitable Siting and Development: Rowan shall consider minimizing the impact to Environmental Justices Communities in connection with its development of Projects.
 - E. Integration: Rowan shall aim to integrate Environmental Justice considerations into the life cycle of project development and engage in principles that support the protection of Environmental Justice Communities from disproportionate burdens from harmful health and environmental outcomes.
 - F. Tracking: Rowan shall attempt to track any commitments made to Environmental Justice Communities (e.g., community benefit agreements, employment targets, mitigation projects).
 - G. Engagement: Rowan shall encourage meaningful engagement with Environmental Justice Communities when developing projects, disseminating information, and conducting outreach where appropriate.
5. Miscellaneous Policy Requirements. This Policy may be updated at any time. This Policy does not confer any rights, either directly or as a third-party beneficiary, upon any person or entity. The standards of this Policy are in addition to, and do not supersede, the provisions of any legal agreement or contract, or any other applicable policy. Rowan shall not be in violation of this Policy by any failure of compliance so long as they make a good faith plan for coming into compliance with this Policy – acknowledging local laws and requirements and such other matters as set forth herein – as soon as reasonably possible. This Policy is intended to be supplemented by other policies and processes of Rowan that may be in effect from time to time, including but not limited to the Rowan Employee Handbook, Supplier Code of Conduct, and the Responsible Contractor Policy.

¹ *Environmental Justice*, EPA (last visited Oct. 22, 2022).

² *Learn About Environmental Justice*, EPA (Sept. 6, 2022).