



Environmental, Social and Governance (ESG) Policy

Introduction

About Us: Archive Data Solutions is a privately held government recognized small business . Our offices are located in New England, Columbus Ohio and Houston Texas. Our submarkets include data center infrastructure, data storage solutions and data center services. Our services include data wiping, data destruction, IT re-purposing and data auditing.

ESG Governance: Our Corporate Sustainability Committee oversees our policies and operational controls for environmental, health, safety and social risks, and is led by at least 50% of our ownership team and managing partners. The Committee meets regularly to set goals, budgets, and implementation timelines and monitor progress and results.

ESG Commitment: We strive to create a sustainable, equitable, healthy, and diverse workplace through a combination of innovative IT recycling and exemplary environmental, social and governance (ESG) performance. This commitment informs every aspect of our business, including how we design and build new projects, operate our portfolio, collaborate with vendors and report progress.

1. Environmental Stewardship

1.1. **Overview:** We aim to embed environmental stewardship in everything we do. We believe we have a responsibility to minimize the energy, carbon, water and waste impacts of our business and recognize that these impacts occur not just in the daily operations of our portfolio but also through our entire value chain. As a result, we strive to reduce environmental impacts across the full life cycle of our data center solutions and services.

1.2. **Statement on Climate Change:** We are committed to driving down our energy and carbon impacts, as we believe that climate change is one of the greatest risks to our world and know that buildings contribute 40% of global greenhouse gas (GHG) emissions. Our sustainability program is committed to environmentally sustainable initiatives that deliver near-term efficiency, value, and health for our business, customers and community. We have committed to a short term objective of reducing our energy use company wide in both gas and electric. It is our goal to avoid the use of hazardous materials at our facility completely. In addition our most recent truck purchase was an electric vehicle to start our plan to move to renewable energy.

1.3. Workplace practices

1.3.1. Our goal is to analyze all business decisions through a lens of environmental impact. Examples include but are not limited to the following: Limiting driving distance for company trucks and renting local to a project when possible. Recycling and repurposing as much of the IT equipment that is replaced in a project. Creating solutions that use less energy and create less heat in the data center. We have committed to a short term objective of reducing our energy use company wide in both gas and electric. It is our goal to avoid the use of hazardous materials at our facility completely. In addition our most recent truck purchase was an electric vehicle to start our plan to move to renewable energy.

1.3.2. Corporate Office: Although the environmental impacts of our corporate operations are a small part of our overall footprint, we believe it is important to live our values. As a result, we have adopted sustainability policies for our HQ and all satellite offices that include criteria such as energy-efficient lighting and appliances, water-efficient fixtures, recycling programs, and e-waste collection events.

1.4. Engaging with Others

1.4.1. Supplier Engagement: When working with vendors and suppliers, we determine they have ESG practices in place as well as a copy of our ESG Policy.

1.4.2. Customer Engagement: When working with customers we provide solutions and practices that can be adopted to reduce carbon emissions and reduce e-waste.

2. Social Responsibility

2.1. **Overview:** A deep commitment to social responsibility is core to who we are as a company. We believe people are at the heart of our business and take pride in our outstanding work culture. We strive to be an optimal employer to our workforce and landlord to our tenants, as well as a valued partner to our communities.

2.2. **Compensation and Benefits:** We know that the first step in hiring and retaining the best talent is to create safe and inspiring workplaces where people feel valued. We offer competitive compensation and benefits to all regular full-time employees, including but not limited to paid holiday, vacation, and sick time, retirement savings plans and medical, dental, and vision coverage. We also offer a very generous equity compensation program that empowers our team members to act and feel like owners, not just employees.

2.3. **Culture, Engagement and Growth:** We create fun, spirited work environments that reward innovation and collaboration at all levels. Every new employee is trained on the key operating principals and promises that we all strive to embody every day. Leaders are encouraged to demonstrate an “open door policy” and employees can provide feedback through their annual performance reviews. We hold periodic employee appreciation events, such as our Halloween costume contest and annual summer party. We also aim to foster both personal and professional growth for employees at all levels of the organization through annual performance reviews, role-specific training and professional development opportunities.

2.4. **Health and Safety:** The health and safety of our employees, tenants, and vendors is of the utmost importance to us. We adhere to leading health and safety standards across our portfolio, and each year, we conduct various health seminars and require our all employees to complete safety training.

2.5. Diversity and Inclusion: We embrace and value diversity in all its forms, whether gender, age, ethnicity or cultural background. Equal opportunity is integral to our recruitment process, as we aim to develop a community of diverse talent. We seek to maintain a positive workplace, free from discrimination and harassment. We champion pay equity and mutual respect, promoting an environment of fairness and equality. Our commitment to diversity and inclusion applies to the highest levels of the organization, including at the board level, where we recognize that diversity strengthens board performance and promotes long-term shareholder value.

2.6. Strengthening our Communities: We have a long history of providing meaningful, and often transformational, support to the communities in which we operate. We are currently building a one acre park in Westervill that we will operate and maintain for the benefit of the public and surrounding community. We also provide charitable support to key industry and professional organizations, often in the form of event sponsorships.

2.7 Employee Well-Being: We ensure that there is NO discrimination of any kind in the workplace as well as encourage the freedom of association. In addition we have quarterly meetings with each department to address mental well being with their team.

3. Governance

3.1. Overview: We view good governance as essential to creating and preserving value for our shareholders and other stakeholders. This includes a sound approach to corporate governance that complies with all applicable laws, rules, regulations and policies as well as unwavering adherence to our values.

3.2 Doing what's Right

3.2.1. Ethics: Our directors and all employees, including senior management, conduct themselves in accordance with the highest moral and ethical standards. We are committed to ensuring a fair workplace for our employees as well as partners with whom we do business. We have an Open-Door Policy to encourage honest and direct communication to resolve issues and concerns in an expeditious manner. We also have an Ethics Hotline that provides an alternative and anonymous method of reporting suspected compliance violations, unlawful or unethical behavior, or fraud.

3.2.2. Human Rights: Archive Data Solutions holds human rights to be an essential component of our business. We support internationally recognized human rights principles that promote and protect human rights. The policy applies to our operations and affiliates in all assets we own and operate.

3.2.3 Modern Slavery and Child Labor: We continuously monitor and review our staff and hiring practices to ensure there is no violation of modern slavery or child labor