



NODE4

Group Environmental and Energy Policy

NODE4

VI.0 DECEMBER 2023

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<i>Table 1 Version Control</i>					
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PURPOSE

Node4 Group recognises its obligation to safeguard the environment in which it operates.

Node4 Group are certified to ISO 14001 Environmental Management System and ISO 50001 Energy Management System providing structure to the control and reduction of our emissions and energy usage.

In accordance with the United Nations Sustainable Development Goal 13: Take urgent action to combat climate change and its impacts, we commit to:

- Regularly review, and where possible improve our environmental performance across all our business procedures.
- Regularly review, and where possible improve our operational energy usage across all our business procedures, in line with the ISO 50001 and UK Government ESOS.
- Reduce our carbon emissions in line with our Net Zero goal.
- Report and review our carbon emissions monthly to drive improvements.
- Fulfil our compliance obligations.
- Hold and maintain relevant external accreditations including ISO 14001 and ISO 50001 certification.
- Incorporate environmental and energy usage factors into business decisions.
- Increase staff awareness and promote good environmental performance through training, communications and policy.
- Conserve energy and other natural resources.
- Reduce waste and pollution and increase reuse and recycling.
- Work with suppliers, contractors, and subcontractors to improve their environmental performance.

We recognise Node4 Groups key impacts on the environment as:

- Emissions and energy consumption associated with powering our Data Centre's in Derby (DC1 and 2), Wakefield (DC3) and Northampton (DC4) and the offices attached to those data centres.
- Emissions associated with employee's homeworking – gas and electricity.
- Transport emissions – travelling to offices and client site via trains, flights, personal and company car.
- Electricity usage at our offices.
- Water usage at our offices.
- Hotel stays.

OBJECTIVES

Environmental

Node4 Group's environmental objective is to attain carbon neutrality by 2030 (sustaining a net zero carbon footprint). Our primary focus is on minimising the emissions we can control and affect.

From 2024 onwards, we will gradually begin offsetting our emissions, with the goal of achieving net zero by 2030.

Top management review the performance of the environmental objective on a quarterly basis.

Energy

Node4 Group's energy objective is combined with the environmental objective. Our primary focus is on improving our energy performance reducing energy consumption.

Our target within our Data Centres is:

- To reduce the Power Usage Effectiveness (PuEs) to 1.41 kw by 2030
 - To reduce the Power Usage Effectiveness (PuEs) by 0.02kw per year.

SCOPE

The scope of Node4's Environmental Management System (EMS) and Energy Management System (EnMS) encompasses the provision of co-location and managed data centre services, managed cloud services, unified communications, network connectivity, and IT-based projects, along with their associated management and support.

Environmental

This scope is applicable to all Node4 Group employees and the following office and data centre locations:

- Derby (DC1 and 2).
- Derby (Stadium Court).
- Newbury.
- Northampton.
- Nottingham.
- Stafford.
- Wakefield.

Energy

This scope is applicable to all Node4 Group employees and the data centres with integral offices, locations:

- Derby (DC1 and 2).
- Northampton (DC4).
- Wakefield (DC3).

MEASURES

The following information outlines the existing measures that Node4 Group has implemented to control emissions and energy usage. These initiatives reflect our commitment to our environmental responsibility and our ongoing efforts to minimise our carbon footprint and increase energy efficiency.

Some of the benefits of operational planning and control of energy usage and emissions are:

- Saving money by reducing energy costs and avoiding carbon taxes or penalties;
- Enhancing reputation and brand value by demonstrating social responsibility and environmental leadership;
- Improving compliance with environmental regulations and standards;
- Increasing competitiveness and innovation by adopting best practices and modern technologies;
- Reducing risks and uncertainties associated with climate change, emissions and energy security.

Data Centres

Node4 Group is dedicated to reducing our environmental impact through a variety of measures in our data centres:

- We operate our data centres on renewable electricity sources, certified by REGO (Renewable Energy Guarantees of Origin), to minimise our carbon footprint;
- When purchasing equipment for our data centres, we give careful consideration to its efficiency, ensuring optimal performance and minimal environmental impact;
- We have diesel generators as a backup to ensure uninterrupted service. Diesel generators at Node4 are utilised solely in the event of a power outage, or during the quarterly maintenance testing of generators, to ensure continuous and uninterrupted service and minimise the impact on the environment;
- We have implemented monitoring systems within our data centres to ensure they are operating at their most efficient capacity, thereby reducing unnecessary energy consumption;
- We maintain strict temperature controls within our data centres to prevent overheating. This not only reduces energy consumption but also contributes to our overall environmental sustainability efforts;
- Increasing the cold temperature by 1 or 2 degrees in January 2024;
- Using thermal imaging to point to hot spots and reducing the temperature;
- We will maintain and improve our Data Centres with energy efficiency in mind, using innovations such as carbon capture from the exhausts of the generators and updating cooling systems.
- Communication with our clients on the need for their servers to be correctly positioned within the racks and the energy saving benefits that brings.

Waste Management

Node4 Group is committed to reducing waste and promoting recycling across all our operations. Our strategies include:

- Aiming to send waste to landfill only if it cannot be recycled, thereby minimising our contribution to landfill waste;
- Using a certified supplier to recycle electronic waste in accordance with WEEE (Waste Electrical and Electronic Equipment) Regulations and the Batteries Directive Act, ensuring responsible disposal of electronic waste;
- Holding WEEE certification through Valpak on their distributor take back scheme. As a member of Valpak, we contribute to efforts to increase the rate of WEEE collection, reuse, and recycling in the UK;
- Investing in technologies such as PandaDocs, DocuSign and Microsoft Technologies to reduce the need for printing, thereby reducing paper waste;
- Providing recycling stations at all our offices to encourage and facilitate recycling among our staff.

Technology

Node4 Group is committed to leveraging our technology to reduce emissions. Our strategies include:

- Offering a Virtual Data Centre to clients as an alternative to on-premise solutions reducing emissions associated with physical data centres;
- Utilising remote Microsoft technologies to facilitate homeworking for our employees and contractors. This reduces the need for commuting, thereby reducing associated emissions and contributing to a more sustainable work model;
- Regularly replacing the devices our employees work from to ensure they are using energy-efficient devices, further reducing energy consumption and emissions.

Node4 Group Offices

To separate our operational energy from our managed offices we will use the Government Energy Savings Opportunity Scheme (ESOS) to measure, monitor and report energy usage.

Energy

Node4 Group is dedicated to minimising our emissions through conscientious energy use in our offices. Our initiatives include:

- Offices within our DCs (Data Centres) are on renewable energy tariffs this significantly reduces our carbon footprint as emissions are offset. The only emissions associated with this are those from transmission and distribution of energy to the offices;
- As part of our environmental objective plan, we aim to transition all our offices to renewable energy tariffs as soon as their existing energy contracts expire.

Lighting

Node4 Group is committed to reducing our emissions through efficient office lighting. Our initiatives include:

- LED lighting is in place in some of our offices, which is significantly more energy-efficient than traditional fluorescent lighting;
- Motion censored lighting is in place in some offices, ensuring that lights are only on when necessary, thereby reducing energy waste;

As part of our environmental objective plan, we aim to have all our offices energy assessed to guide us on the improvements we need to make to ensure that our office lighting is as energy-efficient as possible, further reducing our carbon footprint.

Equipment

Node4 Group is dedicated to reducing our environmental impact through responsible office practices. Our measures include:

- We only purchase 100% renewable paper for our offices, demonstrating our commitment to sustainable resources;
- We are working towards becoming a completely paperless company, reducing our reliance on paper and thereby minimising our environmental footprint;
- We are actively reducing the use of single-use plastics in our offices, contributing to the global effort to reduce plastic waste.

Homeworking

Node4 Group is dedicated to minimising our environmental impact through the promotion of sustainable homeworking practices. Our measures include:

- Offering hybrid working contracts to the majority of our employees, which significantly reduces emissions associated with commuting to the office;
- Encouraging all employees to complete a home environmental working survey, if they wish to do so. This survey inquires whether employees have renewable energy tariffs at home. For those who do, the emissions associated with their homeworking are negligible, helping us to more accurately measure our overall environmental impact;
- Regularly replacing the devices our employees work from to ensure they are using energy-efficient devices, further reducing energy consumption and emissions.

ROLES AND RESPONSIBILITIES

Top Management

Node4 Group top management demonstrate leadership and commitment by:

- Taking accountability for the effectiveness of the Environmental Management System (EMS) and Energy Management System (EnMS);
- Ensuring that environmental and energy policies and objectives are established and are compatible with the strategic direction and the context of the organization;
- Ensuring the integration of the EMS and EnMS requirements into the organization's business processes;

- Ensuring that the resources needed for the EMS and EnMS are available;
- Communicating the importance of effective environmental management and of conforming to the EMS and EnMS requirements;
- Ensuring that the EMS and EnMS achieves its intended outcomes by receiving and reviewing quarterly environmental reports;
- Directing and supporting persons to contribute to the effectiveness of the EMS and EnMS;
- Promoting continual improvement;
- Supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility.

Quality and Compliance Team

Node4 Group's Quality and Compliance team are responsible for:

- Ensuring the business complies with ISO 14001 requirements;
- Ensuring the business complies with ISO 50001 requirements;
- Undertaking internal audits in relation to the environmental management system and energy management system;
- Facilitate external auditors to complete external audits to ensure we are conforming to ISO 14001 and 50001 requirements;
- Managing any non-conformities which may arise;
- Providing sufficient training to employees via People and Performance Team to ensure any new starters are aware of how the work they do impacts the environment;
- Managing risks and opportunities for improvement;
- Understanding the needs and expectations of interested parties;
- Calculating Node4 Groups carbon footprint;
- Ensuring all environmental and energy management system documentation is controlled and updated;
- Setting criteria to establish the severity of environmental aspects and impacts;
- Preparing a response and action plan to any potential emergency situations which may arise;
- Reporting on environmental and energy performance monthly;
- Monitoring of energy performance indications (EnPIs);
- Establishing the energy baseline which informs the energy management review.

Head of Data Centre Operations

Node4 Groups Head of Data Centre Operations and team are responsible for:

- Keeping up to date with maintenance on data centres;

- Ensure energy performance is measured accurately;
- Supporting the Quality and Compliance team in establishing energy objectives;
- Assist in monitoring energy performance alongside the Quality and Compliance team;
- Identifying any risks in conjunction with the Quality and Compliance team;
- Identifying any opportunities for improvement in conjunction with the Quality and Compliance team;
- Attend and input when required in the quarterly Energy Management Reviews;
- Ensuring that Data Centres comply with all relevant laws and regulations

Management Reviews

Node4 Groups Quality and Compliance team are responsible for facilitating an environmental management review and energy management review with relevant top management quarterly to ensure the continuing suitability, adequacy and effectiveness of both management systems.

The environmental and energy management reviews shall include consideration of:

- The status of actions from previous management reviews;
- External and internal issues that are relevant to the management system;
- The needs and expectations of interested parties, including compliance obligations;
- Its significant environmental aspects;
- Risks and opportunities;
- The extent to which objectives have been achieved;
- Information on the organization's performance, including trends in:
 - Nonconformities and corrective actions;
 - Monitoring and measurement results;
 - Audit results;
- Fulfilment of its compliance obligations;
- Adequacy of resources;
- Relevant communication(s) from interested parties, including complaints;
- Opportunities for continual improvement.

Employees

Node4 Group employees are responsible for:

- Ensuring they are aware, and have knowledge, of Node4 Groups environmental and energy policy;
- Ensuring they are aware, and have knowledge, of Node4 Groups environmental and energy objective;
- Ensuring they are aware of how the aspects of their role can lead to impacts on the environment and energy usage (both positive and negative);

- Striving to achieve the environmental and energy policy and objectives which are set;
- Ensured they have completed the required training on the environmental and energy management systems.

COMMUNICATION

Node4 communicates its energy and environmental plans through clear and engaging messages to inform, persuade, and motivate its target audiences. This includes reporting energy usage and emissions through various annual and quarterly reviews. The company works closely with the marketing department to ensure accurate and clear information is disseminated through newsletters, websites, social media, and events. Feedback is actively sought from interested parties to ensure the clarity and relevance of the message.

- Node4 publishes the Carbon Reduction Plan annually;
- The Climate Change Agreement is renewed and published annually;
- Compliance with the Energy Savings Opportunity Scheme (ESOS) is checked and reported annually;
- The Streamlined Energy and Carbon Reporting (SECR) is conducted annually at the end of the financial year;
- All new starters at Node4 receive environmental and energy awareness training as part of their onboarding process;
- Throughout the year, ad-hoc updates and information are shared with all staff through internal posts on platforms such as Viva Engage;
- Energy management reviews are conducted quarterly;
- Environmental management reviews are conducted quarterly;
- The environmental performance, which aligns with the UN Sustainable Development Goals (SDGs), is reviewed by the Corporate Social Responsibility (CSR) steering group on a quarterly basis;
- The environmental performance monitoring and actions, which aligns with the UN Sustainable Development Goals (SDGs), is reviewed by the Corporate Social Responsibility (CSR), are reviewed by the environmental CSR working group bi-monthly.