Environmental and Energy Policy

Top things to takeaway

Commitment

Node4 commits to protecting the environment and resources.

ISO Certifications

Aligned to ISO 14001 and ISO 50001.

Carbon Neutral 2030

Clear target to reach carbon neutrality.

Emissions Reduction

Focus on efficient energy use and monitoring.

Coverage

Policy applies to staff, offices and data centres.

Responsibility

Everyone has a role in environmental performance.

Proprietary Notice

Version control and ownership

Policy owner: Jenny Cooper

Version no	Date	What changed	Changed by	Approver
0.1	07/12/2023	Merge of Environmental and Energy	Jenny Cooper	Eddie Adams
1.0	18/12/2023	Approved	Jenny Cooper	Kate Lincoln
1.1	11/12/2024	Annual review	Jenny Cooper	Eddie Adams
1.2	08/01/2025	Removed Nottingham and updated scope wording	Jenny Cooper	Eddie Adams
1.3	12/12/2025	Annual review and amended energy objective in line with CCA	Jenny Cooper	Eddie Adams
1.4	17/04/2026	Rebrand	Jenny Cooper	Eddie Adams

What is this policy for?

This policy explains how Node4 manages its environmental and energy responsibilities across the business. It sets out our commitment to reducing environmental impact, improving energy efficiency, and supporting our Net Zero ambitions through structured management systems, clear objectives, and ongoing performance review.

Who is this policy for?

This policy applies to all Node4 employees and is relevant to anyone whose work may influence environmental performance or energy use. It sets expectations for how employees consider environmental and energy responsibilities as part of their day-to-day roles and decision-making.

Contents

Scope

Environmental

The provision of public, private and hybrid cloud solutions, network infrastructure and connectivity solutions, cyber security services, data management solutions, and IT Managed Services.

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

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

Energy

The energy management for the provision of public, private and hybrid cloud solutions, network infrastructure and connectivity solutions, cyber security services, data management solutions, and IT Managed Services.

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

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

Measures

The following information outlines the existing measures that Node4 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;

- Minimise the amount of materials used in our operations by reducing material consumption by adopting methods, technologies, and processes;
- Reducing risks and uncertainties associated with climate change, emissions and energy security.

Data Centres

Node4 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 from January 2024 to now;
- 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 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.
- Reducing water waste at Northampton by using recycling water technologies to cool Data Centres (DCs).

Technology

Node4 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.
- To reduce noise emissions during business operations, we have implemented noise dampening measures. At our Wakefield site, all chillers, except for Chiller 4 (which is scheduled for replacement), are equipped with soundproof enclosures around the compressors. Similarly, the two new chillers being installed at our Northampton site also feature soundproof compressor enclosures. The EFC/Munters Units have internal compressors, and any external noise from these units is primarily generated by the fans.
- At our Northampton site, water consumption is actively managed through the control of water conductivity and pH levels within the cooling systems.
  By maintaining these parameters within optimal ranges, the systems can operate for longer periods without requiring water discharge, thereby reducing overall water usage. Control systems are used to optimise unit performance, and the water is chemically dosed with a biocide to support system efficiency. Keeping conductivity levels low helps prevent unnecessary dumping of water, and efforts are focused on slowing this process wherever possible. In addition, cooling systems are operated at more energy-efficient temperature settings and lower loads, which further reduces water demand. At peak operation, water usage is approximately 270 Litre per hour per cooling unit which is significantly lower than the manufacturers data advising potentially 450 litre per hour during peak operation.

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

- All offices within our Data Centres (DCs) and Stafford are on renewable energy tariffs, significantly reducing our carbon footprint by offsetting emissions. The only emissions associated with this are from the transmission and distribution of energy to the offices. Excluding Newbury, which is not on a renewable energy contract and accounts for 0.21% of our business operations energy usage based on 2024 figures, 99.79% of energy consumed is from a renewable source
- 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 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 is 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 our ensure that our office lighting is as energy-efficient as possible, further reducing our carbon footprint.

Equipment

Node4 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 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;
- Regularly replacing the devices our employees work from to ensure they are using energy-efficient devices, further reducing energy consumption and emissions.

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 and environmental management reviews are conducted 6 monthly.

Roles and responsibilities

Top Management

Node4 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'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's 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's 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's Quality and Compliance team are responsible for facilitating an environmental and energy management review with relevant top management six-monthly 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 employees are responsible for:

- Ensuring they are aware, and have knowledge, of Node4's environmental and energy policy;
- Ensuring they are aware, and have knowledge, of Node4's 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.