PRIME
DATA CENTERS

2025 Sustainability Report

TABLE OF CONTENTS

LETTER FROM OUR CEO

NICHOLAS LAAG
Founder and CEO
Prime Data Centers

Over the past year, the digital infrastructure industry has continued to experience tremendous growth as the adoption of technologies like artificial intelligence accelerated. This, coupled with continued growth in cloud and social media, has boosted demand in a power-constrained environment. These times are both incredibly exciting for our sector and potentially perilous for the environment.

At Prime, we see sustainability as an essential element of responsible, long-term growth. Our vision is to create a world that thrives, where technology and sustainability advance together. With our second annual sustainability report, I'm pleased to share the progress we've made and the plans we have for the future.

Energy and climate remain at the center of our strategy, along with water and waste. In 2024, we not only made progress toward our public environmental goals but also laid significant groundwork for driving our work into 2025 and beyond. We executed our first renewable energy transaction, began purchasing only hydrotreated vegetable oil (HVO) as the main fuel source for our U.S. backup generators, and enhanced our data collection capabilities for tracking greenhouse gas emissions in our supply chain.

We maintained our commitment to annually offset 120% of our operating data center water consumption with Water Restoration Certificates®. And we began tracking waste diversion at our U.S. construction sites, which was over 83% for 2024, on average.

We continue to run our business on a foundation of serving our communities—within Prime and beyond. From partnering with local government and community groups in Santa Clara, California, to expanding our support of employees' health and wellness, to launching a new learning management system to enhance team member development, we exhibit our commitment to positively impacting the people and organizations influenced by our company.

At the heart of these efforts lies our fundamental commitment to operating with integrity and excellence. In 2024, we achieved ISO 27001, SOC 2, and PCI-DSS certifications, demonstrating our strong approach to information security. We also began to incorporate sustainability considerations into our procurement process to assess the ability of potential partners to help us deliver on our goals.

I invite you to learn more about Prime's sustainability efforts in this report. Our company and employees continue to rally around this work, and we remain hopeful about our ability to make a meaningful, positive impact on the world we share.

REPORT HIGHLIGHTS

PROTECTING OUR HOME

- Executed our first renewable energy transaction, covering 36% of our U.S. operating portfolio energy consumption

- Stopped buying traditional diesel as the main fuel source for our U.S. backup generators in favor of hydrotreated vegetable oil (HVO)

- Purchased Water Restoration Certificates equal to 120% of operational data center water consumption

SERVING OUR COMMUNITIES

- No reported employee injuries, and 75% fewer injuries for our general contractors and subcontractors despite a 3X increase in hours worked on our construction sites

- Launched a Learning Management System to further enhance employee development

- Formed a Giving Committee to help elevate employee community engagement

LIVING OUR VALUES

- Completed and passed an external ISO 27001 audit for all active buildings and operations

- Conducted our first ESG survey of suppliers

- Began integrating sustainability considerations into our procurement process

ABOUT PRIME DATA CENTERS

2017
ESTABLISHED

22
LOCATIONS

54%
YOY PEOPLE
GROWTH

3+ GW
ROAD MAP

PRIME'S MISSION is to help deliver the global foundation for technology advancement by providing adaptable digital infrastructure solutions. With a road map of 3+ gigawatts and 22 existing locations across the U.S. and Europe, Prime strives to be where our customers need to grow next. Founded in 2017, Prime is headquartered in Dallas, Texas. The company also maintains a large regional office in Denver, Colorado, as well as other smaller office locations and remote team members. Growth, product innovation, and customer success are made possible by hiring, retaining, and developing top industry talent who bring a collaborative approach and strong work ethic to the office every day.

OUR APPROACH TO SUSTAINABILITY AND REPORTING

Sustainability informs every part of our business, from constructing new data centers to building lasting relationships with our communities.

PRIME'S SUSTAINABILITY STRATEGY

Prime strives to deliver on our sustainability vision by acting on three strategic pillars: Protecting Our Home, Serving Our Communities, and Living Our Values. These priorities frame our approach and keep us focused on holistic impacts.

OUR SUSTAINABILITY VISION
Creating a world that thrives, where technology and sustainability advance together

PROTECTING OUR HOME

We take action to create a healthy environment.
- Greenhouse Gas Emissions and Climate
- Energy
- Water
- Waste
- Local Ecosystems

SERVING OUR COMMUNITIES

We promote the well-being of our people and partners.
- Health and Safety
- Employee Engagement and Development
- Inclusion and Belonging
- Community Engagement and Responsiveness
- Workforce Development
- Volunteering

LIVING OUR VALUES

We hold ourselves to a higher standard.
- Disclosure and Reporting
- Ethics and Compliance
- Supplier Sustainability
- Information Security
- Physical Security and Business Continuity

OUR APPROACH

At Prime, we are passionate about building a company that meaningfully integrates sustainability into who we are and what we do. We prioritize sustainability because we see it as critical to our long-term business success, and it is simply the right thing to do. We believe technology and sustainability can and must evolve together. As we live out our mission to support the advancement of technology, we are committed to having an increasingly positive impact on the environment and society. That is why we thoughtfully consider and work to address any adverse impacts we have as we grow our business.

GUIDING PRINCIPLES

INNOVATION

Prime is inspired to think differently, not only in how we meet customer technology needs but also in how we can contribute to tackling some of today's most pressing challenges, such as climate change.

COLLABORATION

Prime believes that working together with industry peers is critical to solving the environmental and social challenges we face today. We work with others because that allows for greater impact and encourages others to come along.

IMPACT

Prime is committed to taking real action. Innovation and collaboration excite us, but turning potential into results is what truly drives us.

SUSTAINABILITY GOVERNANCE

Prime's sustainability efforts are led by a dedicated VP of ESG (Environmental, Social, Governance). Reporting to the EVP of Product Delivery, the VP of ESG has executive support to collaborate effectively across the business. Sustainability updates are presented regularly to Prime's executive team, board of directors, and investors.

MATERIALITY ASSESSMENT[1]

Prime conducted a formal materiality assessment in early 2024 with the aim to better understand and prioritize our sustainability opportunities and risks. This included peer benchmarking, market research on customer and investor priorities, and a review of leading reporting standards and frameworks.

Using these insights, we developed a list of sustainability topics that we believe were potentially material. We then evaluated and scored each topic against internal and external criteria. We also surveyed key stakeholder groups—including employees, investors, customers, suppliers, and surrounding communities—to gather direct feedback. This informed our draft list of priority topics, which we then tested with company leadership.

Our final prioritized list of sustainability topics includes those we believe are important to our business and stakeholders.

Although every topic on the list is important, we understand that dedicating resources to what we consider to be the most critical topics will help ensure that they are appropriately monitored, managed, and communicated. In early 2025, we reviewed our list of topics with key stakeholders and made minor changes to streamline and best reflect our current assessment of these topics.

OUR PRIORITY SUSTAINABILITY TOPICS

MOST IMPORTANT:	MORE IMPORTANT:	IMPORTANT:
• Greenhouse Gas (GHG) Emissions/Climate	• Employee Development and Benefits	• Giving and Volunteering
• Energy Efficiency and Sourcing	• Air Quality	• Conflict Minerals
• Ethics and Integrity	• Human Rights/Labor Practices	• Noise Pollution
• Employee/Contractor Health and Safety	• Biodiversity	• Preservation of Historical/ Cultural Sites
• Water Consumption and Restoration	• Disclosure and Reporting	• Visual Appearance of Data Centers
• Regulation and Compliance	• Physical Security	• Light Pollution
• Data Security and Privacy	• Supplier Sustainability	
• Green Building and Materials	• Community Engagement	
• Waste Management and Recycling	• Talent Acquisition and Retention	
• Inclusion and Belonging		

---

1   While the concepts, events and information discussed in this report may be significant or described as "material," any potential significance should not be read as necessarily rising to the level of materiality, financial or otherwise, as the concept is used in connection with the Company's disclosures required under applicable rules and regulations, including state or U.S. federal laws. For additional information, please see the section titled "Cautionary Statement Regarding Forward-Looking Statements."

STAKEHOLDERS

Prime defines "stakeholders" as those who impact or are impacted by our business. As we aim to deliver on our sustainability strategy and evolve as an organization, we believe it is critical that Prime spends the time needed to understand what is important to our stakeholders and how we can collaborate to achieve mutual success.

In 2024, Prime elevated our engagement with the digital infrastructure sector's largest nonprofit professional association, Infrastructure Masons (iMasons). Prime played a key role in launching iMasons' new Denver chapter and hosted the chapter's launch event. The organization serves as a gathering place where members can connect, advance their careers, and contribute to their communities. The chapter aims to establish a large-scale digital infrastructure community in Denver, address the talent gap by mentoring young people, and foster sustainable innovations between businesses.

Additionally, as part of the iMasons IM100 Awards in 2024, four Prime executives—our EVP of Product Delivery, SVP of Marketing, VP of ESG, and Senior Manager of Marketing—were honored. The awards recognize 100 people who drive meaningful progress across the digital infrastructure industry in an effort to inspire future generations to enter technical fields.

KEY GROUPS | HOW WE ENGAGE

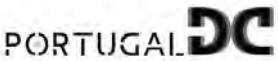| KEY GROUPS	HOW WE ENGAGE
Customers	• Direct engagement throughout customer life cycle • Presentations at customer information sessions • Conferences and events, communications
Investors	• Regular investor meetings • Regular sustainability surveys
Employees	• Semiannual employee surveys • Annual performance reviews for all employees • All-hands meetings • Office/team-based volunteering • Ad hoc lunch and learns, culture-building activities
Surrounding Communities	• Due diligence process • Economic development meetings • Direct ongoing engagement with groups supporting communities
Suppliers	• Requests for proposal, requests for information, contracting, business reviews • Supplier Prime Time in-person event • Meetings with supplier sustainability teams, requests for sustainability information
Industry Collaborations	• Active participation in initiatives that convene peers and others in our industry to drive action, including at the state and community level

INDUSTRY PARTNERS

Infrastructure Masons

European Data Centre Association

GERMAN DATACENTER ASSOCIATION

SPAINDC

COLORADO TECHNOLOGY ASSOCIATION

DANISH DATA CENTER INDUSTRY

nvtc NORTHERN VIRGINIA TECHNOLOGY COUNCIL

PORTUGAL DC

SUSTAINABILITY PARTNERS

CEBI Clean Energy Buyers Institute

Infrastructure Masons

ENERGY STAR PARTNER

SUSTAINABILITY GOALS

✅ COMPLETED   🔵 IN PROGRESS   ✖ MISSED   + INDICATES THAT THE GOAL IS EXPECTED TO BE MAINTAINED ANNUALLY THEREAFTER

STATUS	GOALS IN 2024 REPORT	2024 PROGRESS	PRIORITY AREA	TIMELINE
✅	Calculate and disclose our GHG emissions inventory	Disclosed Scope 1, 2, and 3 GHG inventory (see p. 12)	GHG Emissions and Climate	2025
✅	Explore science-based targets; begin development of decarbonization road map in 2024	Engaged third-party expert to quantify targets and develop detailed road map; targets currently in development	GHG Emissions and Climate	2024
🔵	Conduct a formal climate risk assessment of our operations and business, including our value chain in 2025	Currently underway	GHG Emissions and Climate	2025
✅	Explore the feasibility of converting from traditional diesel to HVO for our U.S. backup generator testing, start-ups, and operations	Stopped buying traditional diesel as the main fuel source for our U.S. backup generators in favor of hydrotreated vegetable oil (HVO)	Energy Sourcing	2024
🔵	Match 100% of data center electricity consumption with renewable sources by 2030	Made first renewable energy purchase, covering 36% of U.S. operating portfolio energy consumption	Energy Sourcing	2030
✅	Annually purchase Water Restoration Certificates equal to 120% of operational data center water consumption	Purchased WRCs equal to 120% of operational data center water consumption	Water	2024+
✅	Explore zero-waste certifications to assess feasibility of certifying across our portfolio	Preparing to pursue zero-waste-to-landfill certification at one new data center	Waste	2024
✅	Pursue green building certifications, with the aim to earn a third-party certification for all new data centers	Continued to pursue ENERGY STAR or LEED BD+C at select locations; achieved Designed to Earn ENERGY STAR for Phoenix data centers. Set new company goal to achieve ENERGY STAR	Local Ecosystems	2024
✅	Provide electric vehicle charging stations at all new data centers as one of our standard features	Incorporated EV charging stations into our standard design	Local Ecosystems	2024+
🔵	Explore third-party certifications for providing habitat for pollinators and assess feasibility of certifying across our portfolio[2]	Engaged third-party certification programs and worked with landscape architects to understand features appropriate for our developments	Local Ecosystems	2024-2025
✖	Achieve "Great" or "Excellent" ratings on pulse survey categories	Worked diligently to respond to employee feedback	Employee Engagement and Development	2024+
✅	Dedicate budget for new data center projects to support community social or environmental needs	Allocated budget to support local priorities	Community Engagement and Responsiveness	2024+
🔵	Create a Workforce Development program to support students in our communities and develop the talent pipeline for our industry	Formed internal committee to lead this work and began outreach to educational institutions and industry groups	Community Engagement and Responsiveness	2025+
✅	Collect sustainability data from suppliers, establish baseline, and identify metrics to track progress	Conducted first sustainability survey of suppliers; updated RFPs to include sustainability questions	Supplier Sustainability	2024
✅	Complete an ISO 27001 audit for all active buildings and operations	Successfully completed audit	Information Security	2024

2   The timeline for exploring habitat certifications was extended from 2024 to 2025.

NEW SUSTAINABILITY GOALS

GOAL	PRIORITY AREA	TIMELINE
Finalize and publicly commit to GHG emissions reduction targets	GHG Emissions and Climate	2025
By 2030, use HVO as our main fuel supply for all U.S. backup generators	Energy Sourcing	2030
Begin the zero-waste certification process at a pilot location	Waste	2025
Pursue ENERGY STAR certification for all eligible operating U.S. data centers and pursue Designed to Earn ENERGY STAR for all eligible new U.S. data centers	Local Ecosystems	2025+
Maintain our ISO 27001, SOC 2, and PCI-DSS certifications and expand to include new data centers as they become operational	Information Security	2025+

Because these are new commitments, progress status cannot yet be included.

PROTECTING OUR HOME

Prime believes we have an obligation to manage our impacts on the planet for the good of our industry, our communities, and future generations.

SECTION HIGHLIGHTS

- Executed our first renewable energy transaction, covering 36% of our U.S. operating portfolio's energy consumption

- Stopped buying traditional diesel as the main fuel source for our U.S. backup generators in favor of hydrotreated vegetable oil (HVO)

- Purchased Water Restoration Certificates equal to 120% of operational data center water consumption

PRIME TAKES ACTION TO PROMOTE A HEALTHY ENVIRONMENT

The widespread adoption of technologies like artificial intelligence (AI) has sparked enormous demand for services like ours—and placed greater burdens on the planet. Data center providers must make a concerted effort to ensure growth happens more sustainably.

GREENHOUSE GAS EMISSIONS AND CLIMATE

OUR GOALS

✓ COMPLETED   ● IN PROGRESS

STATUS	GOAL	TIMELINE
✓	Calculate and disclose our GHG emissions inventory	2025
✓	Explore science-based targets; begin development of decarbonization road map in 2024	2024
●	Conduct a formal climate risk assessment of our operations and business, including our value chain in 2025	2025
New	Finalize and publicly commit to GHG emissions reduction targets	2025

One of the most important ways Prime can take action to protect our home is by managing our greenhouse gas (GHG) emissions to help address climate change. We are committed to measuring, reporting, and reducing GHG emissions in both data center operations and our value chain.

Our climate strategy prioritizes understanding and measuring our environmental impacts. In 2024, we reached a key milestone by establishing our baseline for GHG emissions, successfully completing a comprehensive inventory of Scope 1, 2, and 3 GHG emissions.

Our Scope 1 GHG emissions, which we directly control, come from refrigerants and emergency generators, as well as natural gas used to heat leased office spaces. Our Scope 2 GHG emissions come from purchased electricity consumed at our data centers and leased offices. Scope 3 GHG emissions come from our upstream and downstream value chain and are a significant part of Prime's carbon footprint.

Like many companies, we initially conducted a spend-based analysis to estimate Scope 3 GHG emissions and identify the largest components of such emissions. We then implemented data collection processes with select suppliers and other partners to gather more accurate, activity-based data, with the goal of increasing the accuracy of our inventory.

Our top emitting Scope 3 categories are purchased goods and services, capital goods, and downstream leased assets. The processes we developed required significant time and resources, and the rigor applied will provide a solid foundation towards the goal of effective GHG emissions reduction planning going forward.

OUR APPROACH TO GREENHOUSE GAS EMISSIONS ACCOUNTING

Prime follows the Greenhouse Gas Protocol for emissions accounting, using the operational control approach to define our organizational boundaries. There are different ways to determine which energy sources count as Scope 2 or 3 GHG emissions in leased data centers, and our methodology carefully considers the unique dynamics of our operations and shared responsibilities with our customers.

The majority of our data centers are designed to serve one customer per data hall or per data center. In these instances, we take the following approach to categorizing our three primary sources of electricity consumption emissions:

1. **Customer IT equipment and server power: Prime - Scope 3 | Customer - Scope 2**
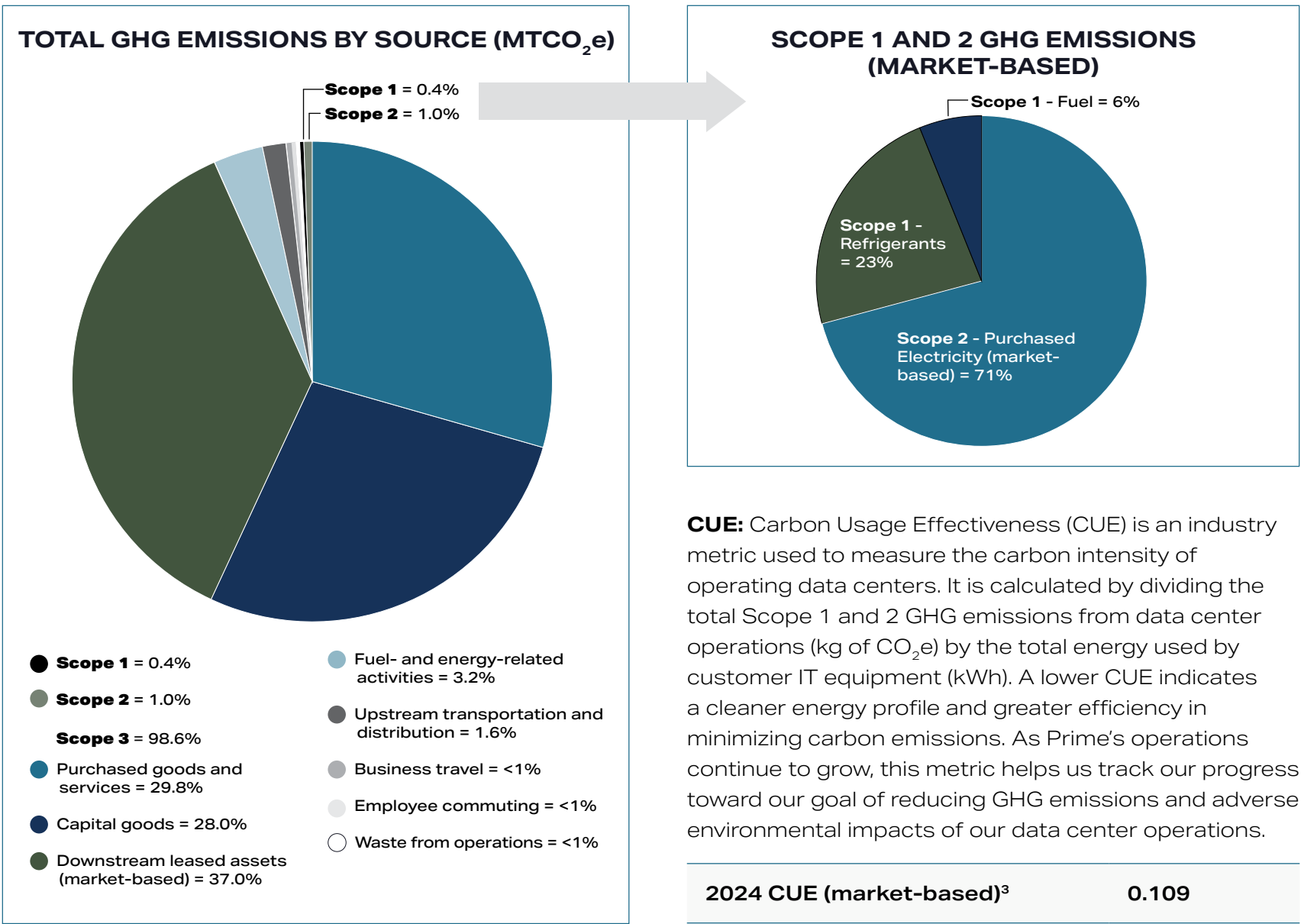
   While we provide facilities and power, customers maintain operational control over server selection, efficiency, and utilization rates.

2. **Mechanical and cooling systems: Prime - Scope 3 | Customer - Scope 2**

   Cooling demands are primarily driven by customer server operations and their specified operating parameters.

3. **Overhead power (offices, lighting, and operational support functions): Prime - Scope 2 | Customer - Scope 3**

   These emissions result from Prime employees operating the facilities and occupying office spaces.

Prime is committed to working with our customers to align GHG accounting methodologies. If our customers take a different approach, we aim to engage in open dialogue to help ensure coverage and prevent double-counting.

OUR GREENHOUSE GAS METRICS

TOTAL GHG EMISSIONS BY SOURCE (MTCO$_2$e)

- **Scope 1** = 0.4%
- **Scope 2** = 1.0%
- **Scope 3** = 98.6%
- Purchased goods and services = 29.8%
- Capital goods = 28.0%
- Downstream leased assets (market-based) = 37.0%
- Fuel- and energy-related activities = 3.2%
- Upstream transportation and distribution = 1.6%
- Business travel = <1%
- Employee commuting = <1%
- Waste from operations = <1%

See our sustainability data table for a compilation of our key metrics.

SCOPE 1 AND 2 GHG EMISSIONS (MARKET-BASED)

- **Scope 1** - Fuel = 6%
- **Scope 1** - Refrigerants = 23%
- **Scope 2** - Purchased Electricity (market-based) = 71%

CUE: Carbon Usage Effectiveness (CUE) is an industry metric used to measure the carbon intensity of operating data centers. It is calculated by dividing the total Scope 1 and 2 GHG emissions from data center operations (kg of CO$_2$e) by the total energy used by customer IT equipment (kWh). A lower CUE indicates a cleaner energy profile and greater efficiency in minimizing carbon emissions. As Prime's operations continue to grow, this metric helps us track our progress toward our goal of reducing GHG emissions and adverse environmental impacts of our data center operations.

2024 CUE (market-based)[3]	**0.109**

3 CUE = total carbon emissions (Scope 1 and 2)/electricity delivered to customer IT equipment (kg CO$_2$e/IT kWh). Prime's CUE is calculated using a weighted average of U.S. operating sites and using the market-based approach for Scope 2 GHG emissions.

EMISSIONS MITIGATION STRATEGY

 SASB STANDARDS

TC-IM-130a.3

We believe the need to respond to the climate crisis is urgent, especially as energy demands grow. Our emissions mitigation strategy includes pursuing action in the following areas.

📊 ENERGY EFFICIENCY	⚡ ENERGY SOURCING
CO₂ EMBODIED CARBON	◎ GREENHOUSE GAS TARGETS

ENERGY

SASB STANDARDS

IF-RE-130a.2

Energy sourcing will remain a significant challenge for the digital infrastructure industry for the foreseeable future, with demand at unprecedented levels and utility supply struggling to keep pace. The rapid advancement of AI has intensified this issue, as data center providers, and hyperscale, cloud, and AI companies seek substantial power from any available source. Data center energy demand is expected to increase by 160% by 2030, consuming 3-4% of global power (up from 1-2% today).[4]

To address these challenges, we are focusing on two key areas: enhancing energy efficiency and securing sustainable energy sources.

---

4   Goldman Sachs. "AI is poised to drive 160% increase in data center power demand." May 14, 2024. https://www.goldmansachs.com/insights/articles/AI-poised-to-drive-160-increase-in-power-demand

ENERGY EFFICIENCY

SASB STANDARDS
IF-RE-130a.5

Managing the adverse environmental impacts associated with energy consumption starts with designing data centers with energy efficiency in mind. Prime has established a standard data center design that prioritizes energy efficiency and improved Power Usage Effectiveness (PUE).

**Prime's energy efficiency measures include the following:**

High-efficiency equipment, such as magnetic bearing chillers and automated, variable speed cooling systems.

Computational fluid dynamics and hydraulic analysis modeling to optimize the design and control of the air and chilled water cooling system, resulting in reduced fan motor power consumption and reduced pump power consumption.

An Integrated Automation System that combines our Building Management System with the Electrical Power Monitoring System to optimize total system control, including equipment staging at the highest efficiency settings and quickly detecting maintenance issues.

Automated free cooling controls to make use of multiple methods to reduce energy consumption during favorable ambient outdoor air conditions.

Prime will continue to research the latest innovations to drive further PUE reduction.
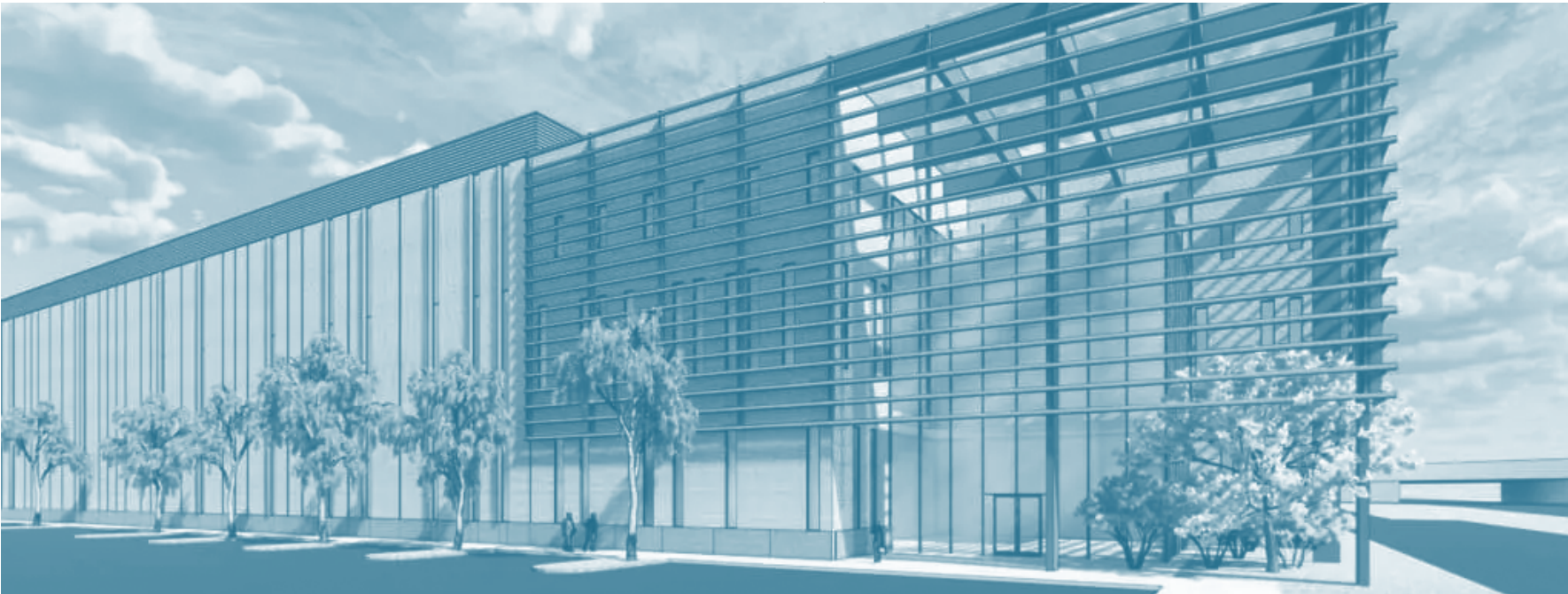
PUE: PUE is an industry metric used to calculate data center efficiency. It is measured by dividing total data center power consumption by the power used by customer IT equipment. The goal is to be as close to 1.0 as possible.

2024 Design PUE[5]	1.20

District Heating: Prime is actively pursuing European data center development opportunities where turnkey, integrated district heating solutions are available. District heating systems typically heat water using energy from the grid, often partially sourced from fossil fuels, and then distribute hot water to surrounding communities for heating and hot water needs. In our integrated approach, we aim to release the waste heat generated by servers in the data center to a district heating network. That network provides heat to the community, and we get chilled water back from the circuit, which we can then use to cool the IT equipment.

This integrated system has significant advantages. The waste heat that is generated can be put to use to meet heating demand in our communities, and it allows us to significantly reduce the energy needed to cool our data centers. This system allows for the reduction of carbon emissions and electricity consumption—a win for both Prime and our communities.

5   PUE = total data center power consumption/IT equipment power consumption. PUE can be calculated in different ways. Our Design PUE calculation is based on Category 1 of the ISO/IEC 30134-2 standard. This calculation reports annualized PUE and measures IT power consumption at Uninterruptible Power Supply (UPS) output. It does not include administrative loads or exterior Computational Fluid Dynamics recirculation.

ENERGY SOURCING

SASB STANDARDS
IF-RE-130a.5

OUR GOALS

⊘ COMPLETED ● IN PROGRESS

STATUS	GOAL	TIMELINE
✅	Explore the feasibility of converting from traditional diesel to HVO for our U.S. backup generator testing, start-ups, and operations	2024
●	Match 100% of data center electricity consumption with renewable sources by 2030	2030
New	By 2030, use HVO as our main fuel supply for all U.S. backup generators	2030

Where our energy comes from is one of the biggest drivers of our environmental impact.

Renewable Energy:[6] In 2024, Prime formalized our renewable energy goal. By 2030, our goal is to match 100% of the electricity consumed by our data centers with renewable sources. There are various approaches to investing in renewable energy, including participating in utility programs, purchasing renewable energy certificates (RECs), and committing to power purchase agreements. We began our renewable energy journey by procuring RECs that covered approximately 36% of our 2024 U.S. operating portfolio's electricity consumption. Most of these RECs were National Green-e® Energy certified, which means they were third-party validated by a trusted global leader to verify accuracy and the chain of custody. A smaller portion of our RECs supported a solar project that met standards for providing habitat for pollinators (see sidebar).

The sun shines on a solar array owned by Connexus Energy in Ramsey, MN.

A portion of our 2024 REC purchases supported a **pollinator-friendly solar project** in Minnesota, owned by Connexus® Energy. Connexus Energy, Minnesota's largest electric cooperative, was the first solar developer in Minnesota to meet the state's standard for pollinator-friendly ground cover starting in 2014. To further validate the suitability of the state solar groundcover standards, Connexus Energy worked with scientists from a conservation nonprofit and national labs. By providing pollinator-friendly flowering plants and native deep-rooted grasses, this solar project supports flora and fauna that play a crucial role in the local ecosystem. Three-fourths of the world's flowering plants and about 35% of the world's food crops depend on animal pollinators to reproduce.[7] And unfortunately, pollinator populations are declining due to habitat loss, disease, and environmental contamination. Prime was eager to support a project that addresses this critical need.

---

6   Prime follows the Environmental Protection Agency (EPA) definition of "renewable energy," which includes fuel sources that restore themselves over short periods of time and do not diminish, such as solar, wind, and hydropower. Additionally, we are actively monitoring nuclear energy developments, as we believe its potential to deliver significant power without carbon emissions is promising. EPA. "What Is Green Power?" Accessed February 24, 2025. https://www.epa.gov/green-power-markets/what-green-power

7   U.S. Department of Agriculture. "The Importance of Pollinators." Accessed March 12, 2025. https://www.usda.gov/about-usda/general-information/initiatives-and-highlighted-programs/peoples-garden/importance-pollinators

Hydrotreated Vegetable Oil (HVO): Reliable backup power is a critical element of any data center and is typically provided by diesel generators. Recognizing the adverse environmental challenges associated with fossil fuels, we explored the use of HVO as a more sustainable alternative. HVO, derived from renewable raw materials, offers a lifecycle carbon emissions reduction of up to 70%, compared to traditional diesel.[8] Additionally, HVO reduces maintenance costs, has a longer shelf life than traditional diesel, and can be used in existing equipment without the need for modifications.

Prime is committed to transitioning from traditional diesel to HVO for our backup generator testing, start-ups, and operations, beginning in the U.S. In 2024, we ceased purchasing traditional diesel for our U.S. data centers and began working with national HVO suppliers to support our goal of using HVO as our main fuel supply for all U.S. backup generators by 2030.[9] We are working through our existing diesel supply and using HVO when tanks require more fuel. (Traditional diesel can be mixed with HVO without impacting operations.) In 2024, we began using HVO exclusively in new backup generators in Los Angeles, CA, and Dallas, TX, and we hope to extend this goal to Europe as our operations expand.

EMBODIED CARBON

Prime is actively researching ways to address the embodied carbon of our data centers. "Embodied carbon" refers to GHG emissions released during the lifecycle of building materials, including extraction, manufacturing, transport, construction, and disposal.

This year, we began researching ways to reduce embodied carbon in the concrete and cement used to construct our data centers. Cement is responsible for approximately 8% of global GHG emissions,[10] and we are committed to finding more sustainable alternatives. We engaged several partners to explore strategies to measure and reduce embodied carbon, including touring a provider of precast concrete that has implemented numerous sustainability measures. We spoke with several suppliers of low-carbon concrete, including a company that makes cement from algae, to identify potential sites for pilot projects with the guidance of our structural engineering partners. As this is an emerging field, we are taking a thoughtful and deliberate approach to its exploration. We anticipate setting an embodied carbon target or threshold for new Prime data centers by the end of 2025.

GREENHOUSE GAS TARGETS

SASB STANDARDS
IF-RE-450a.2

With our baseline GHG emissions established, in 2024 we engaged a third-party expert to help us set GHG emissions reduction targets and develop a detailed decarbonization road map. Later in 2025, we hope to finalize and announce our GHG emissions reduction targets, as well as conduct a formal climate risk assessment of our operations and business, including our value chain.

Prime will continue to collaborate with leading industry groups, such as the iMasons Climate Accord, to identify how our industry can reach net zero GHG emissions by 2050 without the significant use of carbon offsets. We know this will not be easy, but we also know we cannot live up to our commitment to protect our home without addressing this issue head-on.

---

8   Mansfield. "Renewable Diesel: Are You Ready To Deliver On Promises Without Compromise?" Accessed February 13, 2024. https://mansfield.energy/wp-content/uploads/2023/04/Renewable-Diesel-Infographic.rv011024.pdf
9   Our HVO goal has two exceptions. One, in cold climates like Chicago, we will need to use a blend of HVO and traditional diesel to prevent the fuel from sacrificing performance in cold weather. Two, if we experience an emergency and need to resupply fuel quickly, we will have to use traditional diesel if HVO is not immediately available.
10   World Economic Forum. "Cement is a big problem for the environment. Here's how to make it more sustainable." Accessed April 17, 2025. https://www.weforum.org/stories/2024/09/cement-production-sustainable-concrete-co2-emissions/

WATER

OUR GOAL

✓ COMPLETED   ● IN PROGRESS

STATUS	GOAL	TIMELINE
✓	Annually purchase Water Restoration Certificates equal to 120% of operational data center water consumption	2024+

Data centers use water in several ways—for cooling systems, fire suppression, restrooms, and landscaping. In arid climates, water shortages are a serious challenge. As an example, Prime's data centers in the Los Angeles, CA and Phoenix, AZ metropolitan areas are located in areas rated as "high water stress" by the World Resources Institute's Aqueduct Water Risk Atlas tool.[11] To address our water impacts, Prime uses water-saving, closed-loop cooling systems as standard practice, uses reclaimed water or rainwater for irrigation where feasible, and measures our Water Usage Effectiveness (WUE) to help ensure designs and operations are as efficient as possible with this precious resource. We also purchase Water Restoration Certificates to support watershed restoration.

Closed-Loop Cooling: All Prime data centers currently feature non-evaporative, closed-loop cooling systems that repeatedly cycle the same liquid to cool the building. While these systems use more energy than evaporative systems, this is a trade-off we are willing to make because evaporative systems consume significantly more water and require costly backup water storage, increasing the risks associated with water supply.

WUE: WUE is an industry metric that measures how efficiently a data center uses water. We calculate two types of Design WUE, based on data center design. "WUE Site" is calculated by dividing water consumption used for processing data in a data center (in liters) by IT equipment energy consumption (in kilowatt-hours). We also calculate "WUE Source," which considers the amount of water used to create grid electricity to power our data centers and provides a more comprehensive understanding of the true water impact from Prime's electricity consumption. Our Design WUE Source is 4.054.

2024 Design WUE Site[12]	**0.002**

Water Restoration Certificates: We hold ourselves accountable for the water we use and procure Water Restoration Certificates (WRCs) from Bonneville Environmental Foundation (BEF) to support watershed restoration.

Each year, Prime calculates the water consumption of our operating data centers and procures WRCs[13] equal to 120% of our consumption to help secure an overall positive environmental impact. WRCs are third-party verified investments in projects that improve and restore water across North America. This year, Prime purchased WRCs for improved water quality in the Chattahoochee River Basin by supporting a partnership that implements agricultural management best practices to restore the ecosystem, reduce nutrient runoff, and improve water flow.

The restoration project within the Chattahoochee River Basin, where Prime's WRCs helped restore habitat and improve water health.

11   World Resources Institute. "Aqueduct Water Risk Atlas." October 6, 2021. https://www.wri.org/data/aqueduct-water-risk-atlas

12   WUE = water consumption used for processing data in a data center (in liters)/IT equipment energy consumption (in kWh). Our Design WUE calculations are based on the ISO/IEC 30134-9 standard. They do not reflect the water used in Year 1, when the system is installed and initially filled. Our calculations reflect water consumed in Year N, which represents years subsequent to Year 1, when the data center is operating. Water consumed in Year N is for humidification, mechanical maintenance, and loop replenishment to maintain system integrity. Our Design WUE numbers include all water except for irrigation, bathrooms, and break rooms (i.e., domestic water used for non-critical operations).

13   Bonneville Environmental Foundation. "Water Restoration Certificates." https://www.b-e-f.org/programs/water-restoration-certificates/

WASTE

OUR GOALS

✅ COMPLETED   🔵 IN PROGRESS

STATUS	GOAL	TIMELINE
✅	Explore zero-waste certifications to assess feasibility of certifying across our portfolio	2024
New	Begin the zero-waste certification process at a pilot location	2025

Minimizing waste is a key component of Prime's strategy to reduce our overall adverse environmental impact—in our data centers, our offices, and our construction sites. At all our data centers, we provide access to recycling programs for materials, such as paper and plastic, as well as universal waste, including fluorescent lights and batteries. In early 2025, we began working with a new waste partner that can provide better data on our waste and recycling activities. This information is critical to understanding and addressing our waste impacts. If the partnership succeeds at our pilot location, we hope to expand to other locations. Also, in 2024, we introduced composting at our Denver office, which houses our largest workforce.

As part of our commitment, we are preparing to pursue third-party zero-waste-to-landfill certification at one of our new data centers that is slated to become operational later in 2025. Our focus in 2025 is to develop the necessary policies and procedures for certification, which requires 12 months of operational data. The earliest we can begin the formal certification process is late 2026.

We recognize the opportunity to reduce waste during construction. In 2024, we averaged over 83% waste diversion at our active U.S. construction sites. We plan to continue to explore best practices on this topic, including how to share lessons learned among our sites and work to maximize waste diversion.

83%+
average waste diversion rate at active U.S. construction sites in 2024

In 2024, we established a new partnership with an electronic waste recycling provider to responsibly manage the small volume of retired IT equipment produced by Prime operations. It is important to note that our customers are responsible for managing their own IT equipment, including end-of-life processing. Therefore, recycling the servers and other customer equipment in our data centers is generally outside of our scope.

LOCAL ECOSYSTEMS

OUR GOALS

✓ COMPLETED ● IN PROGRESS

STATUS	GOAL	TIMELINE
✓	Pursue green building certifications, with the aim to earn a third-party certification for all new data centers	2024
✓	Provide electric vehicle charging stations at all new data centers as one of our standard features	2024+
●	Explore third-party certifications for providing habitat for pollinators and assess feasibility of certifying across our portfolio[14]	2024-2025
New	Pursue ENERGY STAR certification for all eligible operating U.S. data centers and pursue Designed to Earn ENERGY STAR for all eligible new U.S. data centers	2025+

Our materiality assessment identified GHG emissions, energy, water, and waste as the most important environmental topics to our stakeholders and business. However, green building certifications, biodiversity, and noise and light pollution are also relevant to our operations and have a direct impact on local ecosystems.

SUSTAINABLE DESIGN AND GREEN BUILDING CERTIFICATIONS

While environmentally preferable features are part of every Prime data center, we recognize the value that third-party green building certifications bring through enhanced credibility. We have committed to pursuing ENERGY STAR certification for all eligible operating U.S. data centers and pursuing Designed to Earn ENERGY STAR for all eligible new U.S. data centers, as of 2025. We are actively pursuing ENERGY STAR at locations including Dallas, TX, and Phoenix, AZ. And in 2024, we achieved Designed to Earn ENERGY STAR for two locations in Phoenix. This designation is awarded to eligible projects that are in the design or construction phase and achieve an ENERGY STAR design score of 80 or higher.

In addition, we are pursuing LEED BD+C for the data centers at our Chicago campus, which is currently under construction. As our first LEED project, this experience is helping us determine our approach to potential certifications of other projects. In 2024, we expanded our commitment to sustainable infrastructure by installing EV charging stations at all our properties and have incorporated EV chargers into the design of all new buildings.

BIODIVERSITY

Prime takes care to minimize potential negative impacts on local species of flora and fauna. Our due diligence process includes assessing whether Prime data centers have the potential to negatively impact threatened or endangered species in the areas where we plan to build. Should this occur, we aim to take the necessary steps to avoid and minimize adverse impacts to the extent practical.

Prime's land parcels are occupied primarily by data center buildings and supporting features, such as parking lots and infrastructure yards. However, each site generally has some land set aside for landscaping and green space.

In 2024, we explored third-party wildlife habitat certifications to support pollinators, native plants, and other beneficial features. We also engaged several landscape architects to help us understand which features could be most appropriate for our developments. We plan to continue exploring third-party habitat certifications and landscaping best practices in 2025.

NOISE AND LIGHT POLLUTION

Prime is committed to being a good neighbor in all communities—business and residential—where we operate. We are diligent when it comes to understanding local noise ordinances, designing campuses to help address them, screening in equipment to help reduce noise pollution, completing sound studies for new data centers, and continuing to measure noise levels at the perimeter of our properties to promote ongoing compliance. Prime also designs campuses with a focus on minimizing exterior lighting when it does not affect exterior security, to avoid disturbing residential or traffic areas. For more information on how we engage our communities, see the Community Engagement and Responsiveness section on page 26.

---

14   The timeline for this goal was extended from 2024 to 2025.

ENGAGING EMPLOYEES IN ENVIRONMENTAL STEWARDSHIP

At Prime, embedding sustainable practices into our workplace culture is a core part of our commitment to environmental responsibility. By actively engaging employees in meaningful initiatives, we seek to strengthen our collective commitment to environmental stewardship and help foster meaningful connections with our coworkers.

Our Denver office, Prime's largest location, exemplifies our employee-driven sustainability initiatives. Below are a few examples of our efforts this year.

We introduced a composting program for food scraps and launched a coffee pod recycling initiative in our effort to reduce single-use waste. We also kicked off monthly recycling and composting seminars to educate and engage employees.
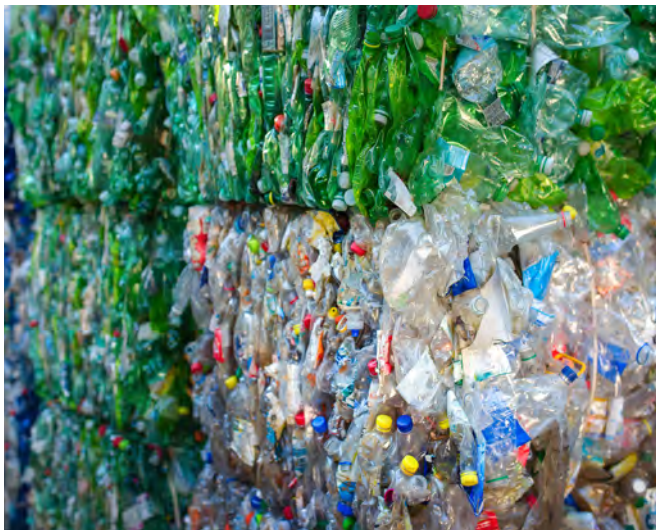
Employees toured a local Denver recycling facility to gain firsthand insight into community-specific recycling processes and to identify potential opportunities for better waste diversion.

Many employees made Earth Month pledges, such as planting a bee garden and commuting via mass transit.

We organized a popular Earth Day Lunch & Learn, which featured sustainability trivia.

SERVING OUR COMMUNITIES

Prime aims to positively impact the lives of those in our communities—internally and externally.

SECTION HIGHLIGHTS

- No reported employee injuries, and 75% fewer injuries for our general contractors and subcontractors despite a 3X increase in hours worked on our construction sites

- Launched a Learning Management System to further enhance employee development

- Formed a Giving Committee to help elevate employee community engagement

PRIME PROMOTES THE WELL-BEING OF OUR PEOPLE AND PARTNERS

Our commitment starts with Prime employees, the soul of our company, and extends to our customers, suppliers, surrounding communities, and other partners. As we develop and operate our data centers, Prime strives to foster productive and mutually beneficial relationships that advance the well-being of everyone we collaborate with.

HEALTH AND SAFETY

Health and safety are fundamental at Prime. We believe our Environmental Health and Safety (EHS) program exceeds the requirements of applicable local laws in the communities where we operate. Our commitment is reflected in our accomplishments—in 2024, our employees did not report any injuries. And our general contractors and their subcontractors experienced 75% fewer injuries while working three times more hours on construction sites. Another standout achievement was reaching 365 days injury-free at our Elk Grove Village, IL construction site in November.

Our Global EHS Program establishes requirements for maintaining safety at all Prime facilities and offices. It documents roles, responsibilities, and processes for correcting and communicating hazards, incident reporting, first aid, electrical safety, fall protection, and other important topics.

Our General Contractor (GC) Guidelines detail expectations for the safety programs utilized by any GC providing services to our company. These safety programs must comply with Prime's extensive EHS requirements related to all aspects of contractor work prior to commencement of any project.

In 2024 and into early 2025, Prime meaningfully enhanced multiple EHS initiatives.

Training: Our safety training program features content tailored to specific roles. For example, Critical Operations Technicians must complete an Occupational Safety and Health Administration (OSHA) 30-hour training, as well as courses on ladder safety, personal protective equipment, heat illness prevention, and more.

Safety Inspections: We began rolling out our health and safety inspection program in the first half of 2024 and completed inspections at all construction projects. Construction inspections are performed at least once per month by our Director of EHS and more frequently by our Construction Project Managers. For inspections conducted in 2024 and the first two inspections of 2025, we received a score of 95.39% safe, meeting our goal of 95%.

On average, in 2024 it took 4.2 days to respond to and close out a finding. Our focus areas in 2025 are fall protection, perimeter protection, housekeeping and sanitation, personal protective equipment utilization, and protected property and egress routes.

Protective Gear: Through a new partnership, eligible employees can obtain prescription safety glasses at no cost to them. This initiative reflects our ongoing commitment to provide team members with access to the appropriate protective equipment needed to work safely and effectively.

Safety Governance: Our EHS program is led by the Director of Environmental Health and Safety, who is responsible for developing and implementing EHS policies and programs. Program metrics are regularly reported to Prime's executive team, board, and investors.

In early 2025, we formed the Prime Data Centers EHS Committee. The goal of this committee is to promote a safe and healthy working environment by creating and maintaining employees' active interest in safety and to assist in the overall effort to minimize the frequency of accidents in the workplace. The Prime Data Centers EHS Committee has four major focus areas:

- Provide measures for employee involvement in achieving a health- and safety-related work environment

- Promptly review all health- and safety-related incidents, injuries, and illnesses

- Conduct quarterly, on-site team safety inspections at operating data centers and construction projects

- Annually evaluate the Prime Data Centers EHS manual and recommend improvements

Prime 2024 Health and Safety Metrics	
Recordable Injuries - Employees	0
Recordable Injuries - Contractors/Subcontractors	1
Total Recordable Injury Rate - Employees	0
Total Recordable Injury Rate - Contractors/Subcontractors	0.38
Lost Time Injuries - Employees	0
Lost Time Injuries - Contractors/Subcontractors	0
Lost Time Injury Rate - Employees	0.00
Lost Time Injury Rate - Contractors/Subcontractors	0.00

EMPLOYEE ENGAGEMENT AND DEVELOPMENT

OUR GOAL

X MISSED

STATUS	GOAL	TIMELINE
X	Achieve "Great" or "Excellent" ratings on pulse survey categories	2024+

At Prime, we believe that work should be more than just earning a paycheck. Our goal is to help employees thrive professionally, develop new skills, and find purpose in what they do. We strive to create a culture that empowers team members to bring their authentic selves to work, embrace challenges while leveraging their strengths, and build meaningful connections with fellow Prime-Time Players. We take great pride in our culture, considering it a key driver of both our short- and long-term success.

Compensation and Benefits: Prime offers market-competitive compensation and a holistic benefits package that includes medical, dental, and vision coverage; life insurance; 401(k) with company match (with employees immediately vested in the match); Health Savings Account-eligible plans (a new addition in 2024); paid vacation and sick time; and disability insurance. We even offer pet insurance and pet-friendly office environments to take care of our four-legged friends. We're proud to have offered Family and Medical Leave Act (FMLA) benefits to eligible employees well before it became a requirement.

To promote health and wellness, Prime offers every employee a free membership that provides access to thousands of gyms, as well as fitness classes, nutrition coaching, and mental well-being resources. In addition, our Employee Assistance Program (EAP) includes up to three face-to-face, confidential, emotional support sessions per year.

In 2024, we further prioritized employee health, organizing fun challenges that helped foster a sense of community and friendly competition while providing important health information. Our two-month Summer Step Challenge encouraged our teams to get active, with 37 employees participating. The winner averaged an impressive 18,000+ steps per day. Additionally, we hosted an eight-week Fruit and Vegetable Challenge, promoting healthy eating habits that aligned with nutritional recommendations for a balanced diet throughout the winter months.

Professional Development: Prime supports employee professional growth in multiple ways. Every employee hired before August of the previous year is part of our 360-degree annual performance review process. For certain roles, we have defined career path milestones and expectations to provide transparency on advancement within the company. This provides employees with an understanding of what is expected of them in their current role and in more senior levels, should they seek to advance. We also support employees participating in trainings, conferences, and other events aimed at furthering their professional development and success at Prime.

Last year, we launched a Learning Management System to further enhance learning and development. The platform offers hundreds of courses, ranging from personal development to compliance to subject-specific topics. In 2024, our training priorities were focused on cybersecurity and safety.

Employee Engagement: Prime believes that building and maintaining a strong culture is not only good for fostering employee happiness and well-being, but also good for business. We conduct semiannual "pulse surveys" to gather data on the overall employee experience. Results are shared with our executive team, and action items are based on how employees rated our performance across various measures, such as culture, leadership sentiment, and professional development. For each category, we calculate our net promoter score (NPS) to gauge overall employee sentiment. Categories are rated as Needs Improvement, Good, Great, or Excellent. We aim for all eight categories to be rated as Great or Excellent. For our pulse survey in 2024, we did not meet our goal. Five categories were rated Good, and one category was rated Needs Improvement. Our company is experiencing rapid growth, and that can bring growing pains. These results are not where we want to be, and we are diligently working to respond to this feedback. Prime's actions include improving internal communication, enhancing training and goal-setting programs, improving benefits, and further supporting workforce development.

Other employee engagement initiatives include a company-wide web platform where employees can share and receive corporate information, employee-led lunch and learns, as well as fun events, like chili cook-offs, murder mystery activities, and pie-eating contests. We also host regular business reviews, which include ideation sessions to encourage employee thoughts and solutions.

In early 2025, Prime brought together employees from around the world in Charleston, SC. The event united our global workforce for executive updates, goal setting for the year ahead, insights into our vision and strategy, and interactive breakout sessions focused on brainstorming and team-building activities.

INCLUSION AND BELONGING

Prime values different points of view and is committed to maintaining a work environment where everyone feels safe, heard, and respected. We believe that diversity of thought makes us a stronger team.

Prime is an Equal Opportunity Employer in compliance with federal, state, and local laws and ordinances. While we will always aim to hire the best candidate for the role, we strive to reach a wide range of potential applicants with a variety of experiences and perspectives. In early 2025, we began utilizing tools within our applicant tracking system to post our open positions to job boards that reach a broad selection of applicants whenever possible. We also procured a software system that allows our new website to be compliant with the Americans with Disabilities Act (ADA) and Web Content Accessibility Guidelines (WCAG).

This means our site is accessible to people with disabilities such as blindness and low vision, deafness, and photosensitivity.

Once people are hired, we want them to feel they can be their authentic selves at work and that their input is valued. Prime believes that one way to build a culture that fosters this inclusion is by spending time on meaningful team-building efforts. These experiences can help forge deeper relationships, which result in a more inclusive, respectful work environment.

Supplier Engagement: Prime strives to be thoughtful in our purchasing decisions, and we consider a wide range of third-party vendors, including small businesses. While we always select the partner best suited to meet each requirement and deliver value to our company, we believe in casting a wide net by distributing requests for proposals (RFPs) to a broad group of suppliers. Prime initially committed to establishing a baseline of diverse supplier spending in 2024 and to setting a target in 2025. However, due to the evolving U.S. legal and policy landscape, we have decided not to pursue these efforts at this time.

Charleston, SC.

COMMUNITY ENGAGEMENT AND RESPONSIVENESS

OUR GOALS

✅ COMPLETED ● IN PROGRESS

STATUS	GOAL	TIMELINE
✅	Dedicate budget for new data center projects to support community social or environmental needs	2024+
●	Create a Workforce Development program to support students in our communities and develop the talent pipeline for our industry	2025+

Prime aims to be a force for good in the communities where we operate, with contributions that extend beyond economic benefits, like tax revenue and job creation. Throughout the development process, Prime takes a thoughtful approach, aiming to actively listen and understand local priorities—particularly when our projects are near residential areas.

We regularly engage with local governments, economic development offices, city councils, and neighborhood groups to stay informed about community needs and collaborate on solutions whenever possible. During data center development, Prime tries to prioritize responsiveness to the community. For example, in Santa Clara, CA, we made donations to numerous organizations that directly benefit the local community, such as the Santa Clara Parade of Champions (which supports youth, veterans, and families facing medical crises), and the Mission City Community Fund (which supports social services, education, health care, theater and arts, and the environment).

WORKFORCE DEVELOPMENT

The digital infrastructure industry is growing rapidly and must increase its talent pool to meet demand. Prime is partnering with industry organizations to help address this challenge.

As mentioned in the Stakeholders section, in November, Prime helped launch the Denver chapter of Infrastructure Masons (iMasons) and hosted the inaugural meeting at our office. We also joined an iMasons group, working to expand job opportunities in the Phoenix metropolitan area. In addition, Prime is a corporate sponsor of the Colorado Technology Association (CTA), which works to champion technology companies of all sizes in Colorado. Several of our women leaders attended CTA's 2024 Women in Tech Conference to gain lessons in leadership and strengthen connections within the industry.

We are committed to taking direct action in local communities and have formed a new committee that meets monthly on this topic. We have begun early-stage discussions with educational institutions and curriculum programs to explore how we can increase high school and college student awareness of career paths in digital infrastructure.

VOLUNTEERING

Volunteering supports local communities and offers Prime-Time Players the ability to strengthen connections with colleagues and the company as a whole. These opportunities are an important part of enhancing and supporting our culture.

More than 60% of our employees, including executives, spent a day volunteering together at Rocky Mountain Arsenal National Wildlife Refuge (RMANWR). The RMANWR Volunteer Coordinator shared that our efforts to build fences, plant new plants, remove invasive plants, and pick up trash accomplished in one day what their staff would complete in more than three weeks and had a financial value of nearly $5,000.[15] We are proud of these engagements and hope for even more employee volunteering and giving in 2025.

In 2024, Prime formed a Giving Committee to establish formal policies and programs for our giving. The committee's initial focus areas included exploring a matching gift policy and paid time off to volunteer. We have piloted these programs and plan to launch more broadly in 2025.

15 According to IndependentSector.org, the 2024 national average value of a volunteer hour was $34.79. Prime employees volunteered 141 hours, for a financial value of $4,905.

LIVING OUR VALUES

Prime is dedicated to strong governance practices because we believe they are essential to fulfilling our commitments, building trust, and creating value.

SECTION HIGHLIGHTS

- Completed and passed an external ISO 27001 audit for all active buildings and operations

- Conducted our first ESG survey of suppliers

- Began integrating sustainability considerations into our procurement process

PRIME HOLDS ITSELF TO A HIGHER STANDARD

Executing with integrity and excellence is the foundation for long-term business success. Our commitment to ethics includes how we interact with employees, customers, and partners, as well as the decisions we make in our day-to-day operations.

ETHICS AND COMPLIANCE

Prime's Code of Conduct in our Employee Handbook lays out expectations for contributing to a positive work environment and conducting business in an ethical manner. Topics covered include harassment and discrimination, equal employment opportunity, anti-corruption and anti-bribery, how to report concerns and access an anonymous hotline, and other matters of professional conduct, such as honesty and properly handling confidential information. All employees must sign the handbook as a condition of employment. In addition, our CEO and CFO have reviewed and signed off on our anti-bribery and anti-corruption policy.

SUPPLIER SUSTAINABILITY

OUR GOAL

✅ COMPLETED   🔵 IN PROGRESS

STATUS	GOAL	TIMELINE
✅	Collect sustainability data from suppliers, establish baseline, and identify metrics to track progress	2024

As a provider of hyperscale and wholesale data centers, Prime's procurement efforts primarily focus on design, construction, and infrastructure, including electrical and mechanical equipment. We work to monitor and understand how our suppliers address potentially adverse environmental and social impacts within their operations and supply chains. Suppliers must adhere to Prime's Supplier Code of Conduct, which defines expectations and requirements for health and safety, human rights and labor, the environment, ethics and anti-corruption, and more. Our focus on respecting human rights centers on suppliers, as Prime employees are located in developed democracies with robust human rights protections.

In 2024, Prime conducted our first ESG survey of our suppliers, focusing on our largest supplier groups: general contractors (GCs), owner furnished contractor installed (OFCIs), suppliers, and design partners. This baseline assessment helped us further integrate sustainability considerations into our procurement process to better identify and address potential risks in our supply chain (such as those related to conflict minerals), gather data to support our Scope 3 GHG emissions inventory, and encourage our suppliers to reduce their potentially adverse environmental impacts. In 2024, we updated our RFPs for these key supplier groups to include questions on these topics, and we began collecting Scope 3 GHG data from GCs on a quarterly basis.

In 2024, we hosted a Supplier Prime Time event in Denver, where certain suppliers gathered with Prime's CEO, EVP of Sales, and EVP of Product Delivery for an insightful panel moderated by our marketing department. Around 100 attendees from 40 different companies participated in this valuable event.

INFORMATION SECURITY

OUR GOAL

✅ COMPLETED 🔵 IN PROGRESS

STATUS	GOAL	TIMELINE
✅	Complete an ISO 27001 audit for all active buildings and operations	2024
New	Maintain our ISO 27001, SOC 2, and PCI-DSS certifications and expand to include new data centers as they become operational	2025+

Our Information Security Handbook documents our commitment to strong governance of cybersecurity and details our efforts to safeguard information. Upon joining the company, all employees, including executives, review this policy, take mandatory cybersecurity training, and are required to repeat such training annually.

It is important to note that the scope of our information security efforts is limited to Prime-managed or Prime-owned systems and information. Prime is not a managed IT services provider and, as a result, generally will not access the customer systems installed in our data halls. This digital infrastructure is provided, managed, and decommissioned by the customer. As such, information security, as it pertains to the storage and transmission of data on customer equipment, is outside of the scope of Prime's control.

For data that falls within Prime's information security scope, we implement numerous controls and practices for protection.

These include regular scanning of our infrastructure for vulnerabilities, such as outdated systems and software, reviewing firewall rules to confirm they are current and sufficient, and conducting third-party testing for external threats. Prime requires regular password changes and utilizes multifactor authentication to protect any access to Prime systems or data. We utilize remote monitoring tools, including certain automations and AI that can proactively identify risks. And we use next-generation antivirus and firewall solutions to protect critical systems. In support of our customers and their wide variety of business needs, we performed an audit to the Payment Card Industry Data Security Standard (PCI-DSS) in 2024.

Prime also carefully manages employee access to systems, following the principle of "least privilege" by limiting user access to what is required for the job. We review access to all systems in order to make sure users are current and appropriate, and when someone leaves the company, access is revoked the same day. This year, we implemented a new cybersecurity awareness training for all employees, including executives.

In 2024, we implemented mobile device management for better security on mobile phones, as well as a new password manager platform to further increase security.

We conduct third-party audits to confirm that policies and procedures are implemented as intended. In 2024, Prime completed and passed an external ISO 27001 audit for all our active buildings and operations.

We completed and passed an external SOC 2 audit. These comprehensive reviews assess our IT efforts relative to industry best practices and guide our efforts to continuously improve our cybersecurity posture.

Prime information security efforts are overseen by our Director of IT and Cybersecurity. Quarterly updates are presented to our Information Security Committee, which is composed of executive leadership and convenes to review testing results, effectiveness of our controls, and implementation of our Information Security Handbook. The committee discusses and approves recommendations to improve our practices.

PHYSICAL SECURITY AND BUSINESS CONTINUITY

The ability to physically secure Prime data centers and to ensure business continuity in the face of unexpected events is critical to maximum customer uptime and overall success. Physical security is a core feature of Prime's hyperscale and wholesale data center offering. Components of Prime's physical security offering include anti-scale perimeter fencing, mantraps, multifactor access controls with biometrics, campus-wide 24-hour CCTV monitoring, on-site officers, and access logs. We remain committed to diligently protecting our data centers to provide customers with peace of mind.

To help manage incidents, such as natural disasters, equipment failure, and other emergencies, Prime has developed our Incident Response and Corporate Emergency Response plans. These document our policies, procedures, guidelines, and other information for responding to unforeseen events and returning to normal operations as quickly as possible.

KEY METRICS AND CONTENT INDICES

SUSTAINABILITY PERFORMANCE METRICS

Protecting Our Home			
Topic	**Indicator**	**Metric**	**Link to Report Content**
GHG Emissions	Scope 1	0.4%	GHG Emissions and Climate, p. 12
	Scope 2	1.0%	
	Scope 3	98.6%	
	Category 1: Purchased Goods & Services	29.8%	
	Category 2: Capital Goods	28%	
	Category 3: Fuel- and Energy-Related Activities	3.2%	
	Category 4: Upstream Transportation & Distribution	1.6%	
	Category 5: Waste	0.001%	
	Category 6: Business Travel	0.3%	
	Category 7: Employee Commuting	0.04%	
	Category 13: Downstream Leased Assets	37%	
	Total CUE - market-based (kg CO_2e/IT kWh)	0.109	
Energy	Percent of energy consumption covered by renewable energy (operating)	36%	Energy, p. 13
	Design PUE	1.20	
Waste	Average Diversion Rate at U.S. Construction Sites (% diverted from landfill)	83%	Waste, p. 18
Water	Total Water (cubic meters)[16]	2,400	Water, p. 17
	Percentage of Water Consumption covered by Water Restoration Certificates (WRCs)	120%	
	Design WUE Site	0.002	

16   Reflects water consumed at operating data centers in 2024.

SUSTAINABILITY PERFORMANCE METRICS (CONTINUED)

Serving Our Communities

Topic	Indicator	Metric	Link to Report Content
Health and Safety	Recordable Injuries - Employees	0	Health and Safety, p. 22
	Recordable Injuries - Contractors/Subcontractors	1	
	Total Recordable Injury Rate - Employees	0	
	Total Recordable Injury Rate - Contractors/Subcontractors	0.38	
	Lost Time Injuries - Employees	0	
	Lost Time Injury Rate - Employees	0	
Employee Engagement	Employees responding to latest pulse survey	57%	Employee Engagement and Development, p. 23
	Pulse survey categories rated as Great or Excellent	2 of 8	
	Pulse survey categories rated as Good	5 of 8	
	Pulse survey categories rated as Needs Improvement	1 of 8	
Philanthropy and Volunteering	Percentage of employees participating in volunteer events	More than 60%	Volunteering, p. 26

SUSTAINABLE ACCOUNTING STANDARDS BOARD (SASB) STANDARDS INDEX

The SASB Standards, now part of the International Financial Reporting Standards (IFRS) Foundation, are a set of standards to guide the disclosure of sustainability information by companies to their investors. The following index maps our disclosures to certain SASB indicators for the real estate industry as well as a few relevant indicators for the technology and communications sector.

SASB Topic	Metric	Examples at Prime	SASB Code
Energy Management	(1) Total energy consumed by portfolio area with data coverage, (2) percentage grid electricity and (3) percentage renewable, by property sector	(1) Not reported. (2) Nearly 100% of electricity is sourced from the grid (<1% of energy is sourced from on-site emergency generators). (3) Average of 28% renewable energy from the grid in 2024 across Prime's U.S. Operating Portfolio. Prime also procured RECs covering 36% of our U.S. operating portfolio's energy consumption.	IF-RE-130a.2
	Percentage of eligible portfolio that (1) has an energy rating and (2) is certified to ENERGY STAR, by property sector	We are in the process of pursuing certification for our eligible portfolio under the ENERGY STAR program. Data centers at our Phoenix campus have achieved Designed to Earn ENERGY STAR.	IF-RE-130a.4
	Description of how building energy management considerations are integrated into property investment analysis and operational strategy	Energy Efficiency, p. 14	IF-RE-130a.5
Environmental Footprint of Hardware Infrastructure	Discussion of the integration of environmental considerations into strategic planning for data center needs	Prime's Investments and Product Development Teams analyze environmental regulations and incentives when evaluating a new property, including green building certifications, energy efficiency standards, and renewable energy programs.	TC-IM-130a.3

SUSTAINABLE ACCOUNTING STANDARDS BOARD (SASB) STANDARDS INDEX (CONTINUED)

SASB Topic	Metric	Examples at Prime	SASB Code
Water Management	(1) Total water withdrawn by portfolio area with data coverage and (2) percentage in regions with High or Extremely High Baseline Water Stress, by property sector	(1) In 2024, Prime purchased Water Restoration Certificates from Bonneville Environmental Foundation equal to 120% of operational data center water consumption. (2) 0% of water withdrawn at operating sites were in regions with High or Extremely High Baseline Water Stress. Two of our data centers are located in regions that qualify as high stress according to the World Resources Institute (WRI) Aqueduct Water Risk Atlas, but were not operational during the reporting period.	IF-RE-140a.2; TC-IM-130a.2
	Description of water management risks and discussion of strategies and practices to mitigate those risks	Water, p. 17	IF-RE-140a.4
Climate Change Adaptation	Description of climate change risk exposure analysis, degree of systematic portfolio exposure, and strategies for mitigating risks	A formal climate risk assessment of operations and business, including our value chain is planned for 2025.	IF-RE-450a.2
Activity Metrics	Number of assets, by property sector	22 locations, p. 4	IF-RE-000.A

UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS INDEX

The United Nations Sustainable Development Goals (SDGs) serve as a global framework to support "peace and prosperity for people and the planet, now and in the future." These 17 goals tackle topics such as climate change, poverty, health, education, inequality, and other challenges. We have identified the SDGs that we believe most closely align with our business, described below. We contribute to addressing other SDGs, but for the purposes of our reporting, have decided to focus on those that we believe are most material to Prime.

SDG Goal	Examples at Prime	SDG Target
Clean Water and Sanitation	**Water** Annual WRCs purchase goal (p. 17) Reclaimed, closed-loop cooling systems (p. 17)	**6.4** By 2030, substantially increase water-use efficiency across all sectors and ensure sustainable withdrawals and supply of freshwater to address water scarcity and substantially reduce the number of people suffering from water scarcity **6.6** By 2030, protect and restore water-related ecosystems, including mountains, forests, wetlands, rivers, aquifers, and lakes
Affordable and Clean Energy	**Energy** Energy Efficiency (p. 14) **Energy Sourcing** Renewable electricity goal (p. 15) Renewable energy purchase (p. 15) HVO fuel supply goal (p. 15)	**7.2** By 2030, increase substantially the share of renewable energy in the global energy mix **7.3** By 2030, double the global rate of improvement in energy efficiency
Decent Work and Economic Growth	**Workforce Development** Goal to develop the talent pipeline (p. 26) Partnership with iMasons (p. 26) **Health and Safety** EHS Program (p. 22) Training (p. 22) Safety Inspections (p. 22) Protective Gear (p. 23) Safety Governance (p. 23) **Supplier Sustainability** Human rights protections part of Supplier Code of Conduct (p. 28)	**8.5** By 2030, achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value **8.8** Protect labor rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment

UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS INDEX
(CONTINUED)

SDG Goal		Examples at Prime	SDG Target
	Industry, Innovation and Infrastructure	**Energy Efficiency** Energy-efficient technologies and analyses (p. 14) HVO fuel supply goal (p. 15) **Embodied Carbon** (p. 16) **Greenhouse Gas Targets** (p. 16)	**9.4** By 2030, upgrade infrastructure and retrofit industries to make them sustainable, with increased resource-use efficiency and greater adoption of clean and environmentally sound technologies and industrial processes, with all countries taking action in accordance with their respective capabilities
	Climate Action	**Engaging Employees in Environmental Stewardship** Sustainability awareness efforts (p. 20)	**13.3** Improve education, awareness-raising, and human and institutional capacity on climate change mitigation, adaptation, impact reduction, and early warning

SCOPE OF THIS REPORT

The data in this report covers Prime's business operations during the calendar year 2024 (January 1 through December 31), unless otherwise noted. Qualitative discussion of our efforts covers calendar year 2024 and the first half of calendar year 2025 (through June), unless otherwise noted. "Prime," "we," "us," "our," and "the company" refer to Prime Data Centers, LLC. At Prime, we use the term "sustainability" to refer to our management of environmental, social, and governance topics. We may use the term "ESG" occasionally, recognizing that this term resonates with certain stakeholders, such as investors, although this term is generally used interchangeably with "sustainability." To further provide stakeholders with meaningful information on our sustainability performance, this year we have reported against the recommended disclosures for the Real Estate sector, as stated by the Sustainable Accounting Standards Board (SASB) Standards, which we believe are most relevant to our core capabilities.

DISCLAIMER

PRIME
DATA CENTERS

PRIME
DATA CENTERS