

PRIME DATA CENTERS 2024 SUSTAINABILITY REPORT

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Letter from Our CEO



Nicholas Laag
Founder & CEO
Prime Data Centers

Prime has been passionate about sustainability since our founding in 2017. It is this passion that drives a significant sense of pride as we deliver this, our inaugural sustainability report.

As a digital infrastructure leader, Prime is compelled to do our part in creating a world that thrives, where technology and sustainability advance together. We conduct business in an industry that is highly energy intensive with sustained demand projected for years to come. For us, this creates a sense of urgency but also motivation.

When we innovate and drive real progress, the potential for making a positive impact is material.

With such a crucial opportunity in front of us, Prime launched an enhanced sustainability strategy in May of 2024 that centers around three pillars: “Protecting our Home,” “Serving our Communities,” and “Living our Values.”



Protecting our Home

Energy and climate are critical issues facing the digital infrastructure industry. This is why we prioritized the development of our renewable energy strategy and have committed to matching 100% of the electricity consumed by our data centers with renewable sources by 2030. While those issues are of the utmost importance, they are not the only ones we care about. In Prime's markets like Phoenix, AZ, there is a serious water crisis. We are proud to have secured Water Restoration Certificates® (WRCs) from Bonneville Environmental Foundation (BEF) equal to 120% of our 2023 operating portfolio consumption.



Serving our Communities

Prime is committed to positively impacting the people and organizations influenced by our company, such as employees, customers, suppliers, and nearby residents. Internally, we strive to make every Prime-Time Player (what we call our employees) feel safe, valued, and empowered to make a difference. In 2023, we strengthened our annual review process and invested heavily in supporting employee professional development. We also implemented thorough construction training and safety protocols for our sites because health and safety are non-negotiable and part of our core values.



Living our Values

We believe that operating with integrity is an important driver of our long-term success. This includes being transparent about our intentions and our results. In this inaugural report, we provide select sustainability metrics. In future reports, we plan to provide even more insights into our performance. By collaborating with industry and sustainability groups, we will ensure the metrics and methodology used to define progress are in line with accepted standards for efficient, effective comparison. It is important that Prime Sustainability is more than just words.



Additional Accomplishments

While this report provides insight on our approach to many sustainability issues, I would like to call out a few additional examples of progress. First, in 2023, Prime's design team developed electrical and mechanical design standards for new developments. Our block-level electrical systems reduce the amount of infrastructure used for more efficient delivery while maintaining high reliability standards. Our closed-loop cooling system uses a fraction of the water needed when compared to traditional alternatives, delivering near-zero Water Usage Effectiveness (WUE). We also increased industry collaboration by joining the iMasons Climate Accord and the Clean Energy Buyers Association. In 2024, we appointed a new Vice President of ESG and increased our overall investment in sustainability to deliver meaningful results. Looking ahead, Prime plans to take our sustainability strategy to the next level by focusing on decarbonization pathways and emission reduction targets, third-party certifications for waste and green building, and more.

I welcome you to learn more about Prime Sustainability by reading this report. We are happy to share where we are at today and look forward to building on successes for years to come. With a top-down commitment from Prime leadership and highly engaged Prime-Time Players, we are optimistic that progress will be steady and yield meaningful results.



About Prime Data Centers



2017
ESTABLISHED



22
LOCATIONS



104%
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 will 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



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 equally committed to having an increasingly positive impact on the environment and society. That is why we strive to thoughtfully consider and address our impacts as we grow our business.

Prime's Sustainability Strategy

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

OUR SUSTAINABILITY PASSION

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 & Climate
- Energy
- Water
- Waste
- Local Ecosystems



SERVING OUR COMMUNITIES

We promote the well-being of our people and partners.

- Health and Safety
- Employee Engagement & Development
- Diversity and Inclusion
- 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

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 Vice President of ESG (Environmental, Social, Governance). Reporting to the Executive VP of Product Delivery, the VP of ESG has executive support to collaborate effectively across the business. Sustainability updates are presented quarterly to Prime’s executive team, board of directors, and investors.

Materiality Assessment¹

Prime conducted a formal materiality assessment in early 2024 with the aim of providing additional clarity as to our greatest sustainability opportunities and risks. This included peer benchmarking, market research on customer and investor priorities, and a review of current reporting standards and frameworks. Prime also surveyed key stakeholder groups—including employees, investors, suppliers, and surrounding communities—for direct feedback. We used those insights to develop a prioritized list of sustainability topics that we believe are important to our business and stakeholders. Although every topic on the list is important, Prime understands the importance of dedicating resources to what we consider to be the most critical issues to better ensure they are appropriately monitored, managed, and communicated.

OUR PRIORITY SUSTAINABILITY TOPICS				
MOST IMPORTANT	• Greenhouse Gas Emissions / Climate	• Ethics and Integrity	• Regulation and Compliance	• Diverse Representation and Inclusion
	• Energy Management and Conservation	• Employee / Contractor Health and Safety	• Data Security and Privacy	• Green Building and Materials
	• Renewable Energy	• Water Consumption	• Waste Management and Recycling	
MORE IMPORTANT	• Employee Development and Benefits	• Embodied Carbon	• Alternative Fuels (e.g., hydrotreated vegetable oil)	
	• Human Rights / Labor Practices	• Biodiversity	• Supplier Sustainability	
	• Air Quality	• Disclosure and Reporting	• Community Engagement	
IMPORTANT	• Talent Acquisition and Retention	• Noise Pollution	• Visual Appearance of Data Centers	
	• Volunteering	• Supplier Diversity	• Light Pollution	
	• Conflict Minerals	• Preservation of Historical / Cultural Sites		

¹Inclusion of information discussed in this report should not be construed as a characterization of the financial materiality or impact of that information.

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 our business, we believe it is critical that Prime spends the necessary time to understand what is important to our stakeholders and how we can collaborate to achieve mutual success.



Key Stakeholder Groups	How We Engage
Customers	<ul style="list-style-type: none">• Direct engagement throughout customer life cycle• Presentations at customer information sessions• Conferences and events, communications
Investors	<ul style="list-style-type: none">• Quarterly investor meetings• Regular sustainability surveys
Employees	<ul style="list-style-type: none">• Semiannual employee surveys• Executive-driven annual performance reviews for all employees• All-hands meetings• Office/team-based volunteering• Ad hoc lunch and learns, culture-building activities
Surrounding Communities	<ul style="list-style-type: none">• Due diligence process• Economic development meetings• Direct engagement with groups supporting communities
Suppliers	<ul style="list-style-type: none">• Requests for proposal, requests for information, contracting• Regular business reviews• Meetings with supplier sustainability teams, requests for sustainability information
Industry Collaborations	<ul style="list-style-type: none">• Actively participate in initiatives that convene peers and others in our industry to drive action, including at the state and community level

INDUSTRY PARTNERS



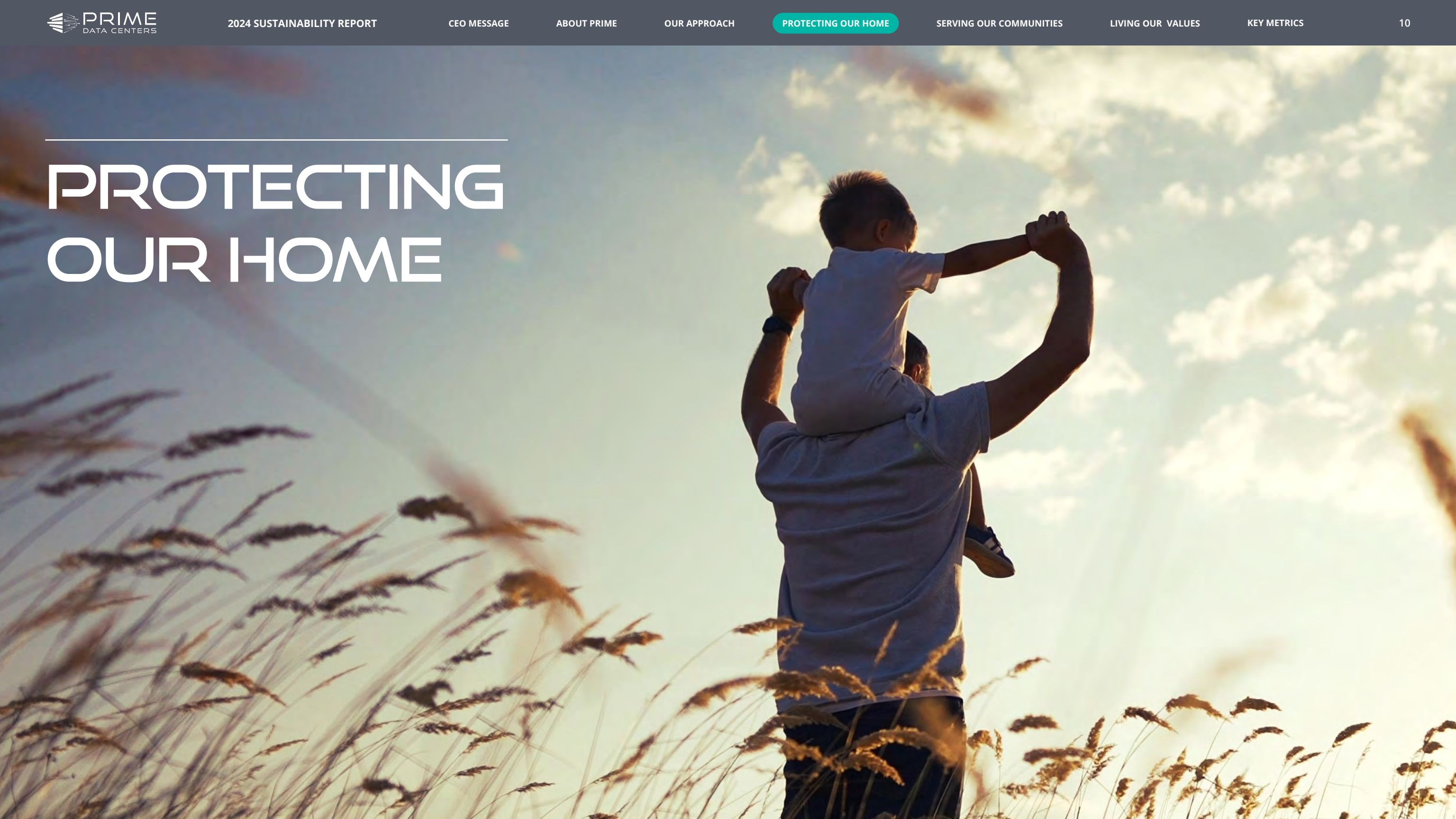
SUSTAINABILITY PARTNERS



Scope of This Report

The data in this report covers Prime's business operations during the calendar year 2023 (January 1 through December 31), unless otherwise noted. Qualitative discussion of our efforts covers calendar year 2023 and the first half of calendar year 2024 (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 also use the term "ESG" occasionally, recognizing this term resonates with certain stakeholders, such as investors, although this term is generally used interchangeably with "sustainability."

PROTECTING OUR HOME



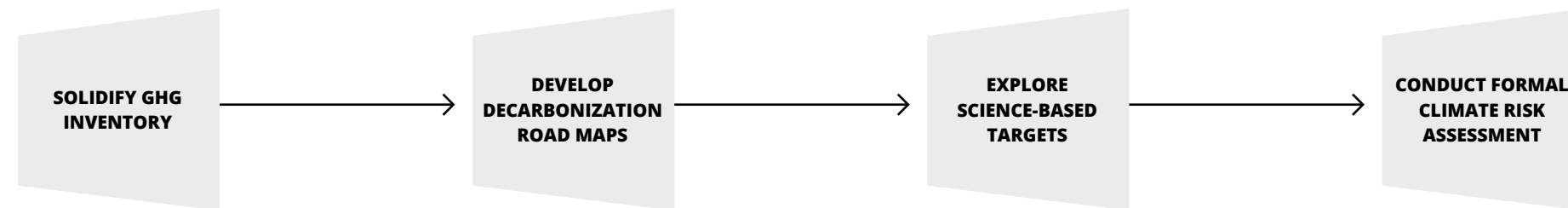
Prime Takes Action to Promote a Healthy Environment

As technology becomes evermore necessary for societies to develop and function—and as artificial intelligence becomes increasingly embedded in our modern lives—the demand for data centers is growing exponentially. The digital infrastructure industry is at an inflection point. Data center providers must make a concerted effort to ensure growth is aligned with appropriate sustainability strategy. Prime believes we have an obligation to manage our impact on the planet for the good of our industry, our communities, and future generations.

Greenhouse Gas Emissions and Climate

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.

The first priority of Prime's climate strategy is to understand and measure our impacts. One of our top environmental priorities of 2024 is to establish our GHG emissions baseline, and we are working to develop processes for measuring and reporting our Scope 1, 2, and 3 GHG emissions in accordance with the Greenhouse Gas Protocol. Once our baseline is established, we plan to develop decarbonization pathways, set GHG emissions reduction goals, and conduct a formal climate risk assessment of our operations and business.



Knowing that value chain emissions (i.e., Scope 3) are a significant part of many data center companies' carbon footprint, we began working with a consultant to conduct a high-level assessment of our Scope 3 emissions, using a spend-based approach to gain a high-level understanding of our hot spots. We learned that our top emitting Scope 3 categories—based on spend—are:



Later in 2024, we plan to do a deeper dive into Scope 3 GHG emissions, using activity data that will allow for more accurate measurement. We aim to include this data in next year's sustainability report, along with the data for our Scope 1 and 2 GHG emissions.

OUR COMMITMENT



- Calculate and disclose our GHG emissions inventory, beginning in 2025.
- Explore science-based targets; begin development of decarbonization road map in 2024.
- Conduct a formal climate risk assessment of our operations and value chain in 2025.

Emissions Mitigation Strategy

Measuring GHG emissions is an essential step in understanding and addressing Prime's climate impact. Although comprehensive analysis takes time, we are already aware of ways we can improve our GHG emissions footprint. Prime believes the need to respond to the climate crisis is urgent, so we are taking action in the following areas, in parallel with setting our baseline.

Renewable Energy: In 2024, we are developing a formal strategy to map out our path to 100% renewable electricity. See the [Renewable Energy](#) section of this report for more details.

Energy Efficiency: In 2023, Prime established a new standard data center design that prioritizes energy efficiency and improved Power Usage Effectiveness (PUE). Moving forward, we will continue to research the latest innovations to drive even further PUE reduction. See the [Energy Efficiency](#) section of this report for information on how efficiency is part of our standard design.



Embodied Carbon: Prime is actively researching ways to address the embodied carbon of our data centers. "Embodied carbon" refers to GHG emissions associated with the manufacturing, transporting, installing, maintaining, and disposing of building materials. One of the ways we are addressing embodied carbon is by minimizing the upstream transportation of our generators. We locate our generators outside of our data center buildings to maximize customer space. The generators are enclosed to protect them from the elements, mitigate noise, and secure them. It is common in our industry to ship a generator engine from where it was manufactured to a separate location to be put in a steel enclosure. Then, the whole assembly (generator + enclosure) is shipped to the data center location. For some of our sites, we shipped generator engines from their manufacturing locations directly to our data centers, then built generator enclosures out of materials such as cinder block and steel. This approach reduces upstream transportation of our equipment, and we are looking to use this approach in our developments when feasible.

In addition, we are researching options to reduce the embodied carbon of the concrete used to build our data centers. Concrete is responsible for approximately 8% of global GHG emissions,² which is why we believe this represents an important opportunity for us to decarbonize. It is not yet clear to us which approaches will work best in our designs, but our intention is to conduct research and gather data throughout 2024, with the ultimate aim to set an embodied carbon goal or threshold for all new Prime facilities in 2025.

Science-Based Targets: To avert the worst potential impacts of climate change, the UN has stated that global GHG emissions need to be reduced by more than 40% by 2030³ and reach net zero by 2050.⁴ Prime is committed to GHG emissions reduction and exploring science-based targets. In 2024, Prime aims to engage a third-party expert and collaborate in the development of a detailed decarbonization road map as it applies to our operations and business. Prime will also continue to collaborate with leading industry groups, such as the iMasons Climate Accord, to identify how an industry projected to consume 35 GW by 2030 in the U.S. alone⁵ can reach net zero 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.

A Note on Carbon Accounting

As we develop our GHG emissions inventory, we are following the guidance of the Greenhouse Gas Protocol, the internationally recognized standard for corporate emissions accounting. However, there is ambiguity around how the GHG Protocol applies to multi-tenant or "colocation" data centers where companies like Prime lease out data center capacity to customers (space, power, cooling, and security) for their IT equipment. Data center providers allocate electricity emissions between Scope 2 and Scope 3 in different ways. We are consulting sector guidance, learning from peers and customers, and collaborating within our industry to determine the most appropriate approach for Prime and our customers. When we disclose our GHG emissions inventory next year, we aim to clearly explain what is included in our scopes and our rationale for such determinations.

²"Concrete: 8% of global emissions and rising. Which innovations can achieve net zero by 2050?" Accessed June 14, 2024. <https://energypost.eu/concrete-8-of-global-emissions-and-rising-which-innovations-can-achieve-net-zero-by-2050>

³UNFCCC. "Climate Plans Remain Insufficient: More Ambitious Action Needed Now." October 26, 2022. <https://unfccc.int/news/climate-plans-remain-insufficient-more-ambitious-action-needed-now>

⁴IPCC. "AR6 Synthesis Report: Summary for Policymakers Headline Statements." Accessed April 30, 2024. <https://www.ipcc.ch/report/ar6/syr/resources/spm-headline-statements/>

⁵Newmark. "2023 U.S. Data Center Market Overview & Market Clusters." January 2024. <https://www.nmrk.com/insights/market-report/2023-u-s-data-center-market-overview-market-clusters>

Energy

Energy sourcing is one of the largest challenges currently faced by the digital infrastructure industry. Demand is at an all-time high, and utility supply is struggling to keep up with demand. The onset of Artificial Intelligence has led data center providers, hyperscale cloud, and AI companies to secure large amounts of utility power wherever, and from whatever source, it can be found. There are two main drivers for this spike in demand: First, generative AI requires much more power than what a non-AI data center uses. And second, the heat generated from AI hardware is significant, which means more cooling is needed to keep the environment at ideal operating temperatures and prevent the hardware from becoming overheated or melting.

This trend is not projected to level out any time soon. In fact, analysts project data center power consumption to double by 2030, compared to a 2022 baseline.⁶ We cannot help but ask ourselves the question: How can this industry achieve net zero emissions when every watt of available power—traditional and renewable—is required to address demand? This is an integral reason why data center providers need to embed sustainability as they map out their growth plans.

Prime is addressing the energy issue from two angles: energy efficiency and energy sourcing.

Energy Efficiency

Managing the adverse environmental impacts associated with energy consumption starts with designing data centers with energy efficiency in mind. 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 modeling to optimize the design and control of the air and chilled water cooling system, resulting in reduced fan motor power consumption (by reducing airflow when it is not needed) and reduced pump power consumption (by eliminating points of resistance in the design)
- An Integrated Automation System that combines our Building Management System with the Electrical Power Monitoring System to allow for optimizing 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



⁶ Newmark. "2023 U.S. Data Center Market Overview & Market Clusters." January 2024.

<https://www.nmrk.com/insights/market-report/2023-u-s-data-center-market-overview-market-clusters>

Power Usage Effectiveness (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. Prime reports "design PUE," which is the PUE our data centers are designed for at various levels of customer load, and "operating PUE," which is the actual PUE of operating data centers.

Prime 2023 Energy Metrics	
Design PUE – 75% critical load ⁷	1.29
Design PUE – 100% critical load ⁷	1.33
Operating PUE ⁸	1.44

PUE = total data center power consumption/
IT equipment power consumption

See our [sustainability data table](#) for a compilation of our key metrics

District Heating: Prime is actively investing in European data center development opportunities where turnkey, data center-integrated district heating is available. Typically, district heating systems involve heating water using energy from the grid, often sourced partially from fossil fuels, and distributing this hot water through pipelines to nearby communities for heating and hot water purposes. With our data center integration, exhaust heat will be captured from customer IT equipment and used to help heat the water pumped out by district heating plants. Cooled water will then be sent back to data centers—after it has helped heat the community—thereby reducing the amount of energy required to maintain optimal data center temperatures. This arrangement will foster a more efficient use of resources, a reduced energy consumption and carbon emissions, and a mutually beneficial solution for all parties involved.



Energy Sourcing

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

Renewable Energy: In 2024, Prime formalized our approach and commitment to renewable energy. By 2030, our aim is to match 100% of the electricity consumed by our data centers with renewable sources. To reach this goal, we will explore various approaches, such as utility programs, energy attribute certificates, and power purchase agreements. We do not yet have every step mapped out, but we know this is the right direction: for Prime, for our customers, and for society. Data centers consume significant amounts of energy, and in order to live up to our sustainability values, we believe we must do our part to help shift toward a more sustainable grid and drive decarbonization at scale.

OUR COMMITMENT

- Match 100% of data center electricity consumption with renewable sources by 2030.



⁷Design PUE reflects facilities where design is complete and measures critical load at PDU Output. Does not include the handful of data centers we acquired but did not design.
⁸In 2023, Operating PUE was driven by acquired buildings that do not reflect our standard design.

Hydrotreated Vegetable Oil (HVO): Reliable backup power is a fundamental component of any data center. Traditionally, this is provided by diesel generators, and our data centers have been no exception. Recognizing the adverse environmental impacts associated with this fossil fuel, we analyzed using HVO in place of traditional diesel. HVO is made from raw materials of renewable origin, such as cooking oils. Because these materials absorb carbon as they grow, their life cycle carbon emissions are much lower than traditional diesel, as much as 75-95% lower over their life cycle.⁹ In addition, HVO reduces maintenance costs and has other benefits, such as a longer shelf life, and it can be used in place of traditional diesel without requiring modifications to our equipment.

Because of these benefits, Prime is committed to exploring the feasibility of converting from traditional diesel to HVO for our generator testing, start-ups, and operations—starting in the U.S. Today, HVO is not as readily available as traditional diesel, and at times, it can have a cost premium. We will work to understand the implications of using this fuel and look forward to reporting lessons learned in next year's report.

OUR COMMITMENT

- In 2024, explore the feasibility of converting from traditional diesel to HVO for our U.S. generator testing, startups, and operations.



Water

Data centers use water in a number of different ways, such as cooling systems, fire suppression, break rooms and restrooms, and landscaping. In arid climates, water shortages are a serious challenge. This has led to data center providers, such as Prime, keeping a focused eye on metrics, like Water Usage Effectiveness (WUE), to help ensure designs and operations are as efficient as possible with this precious resource.

Closed-Loop Cooling: Data centers have commonly been cooled by evaporative cooling systems where water evaporation is used as a way to absorb heat, cooling the surrounding area. While this is an effective means of cooling, it uses substantial amounts of water, putting significant stress on local watersheds. Prime's Los Angeles and Phoenix data center developments are located in areas rated as "high water stress" by the World Resources Institute's Aqueduct Water Risk Atlas tool.¹⁰ In these regions, it is imperative that Prime is as efficient as possible when it comes to water consumption. That said, Prime is focused on WUE in every operational and developmental market, not just the high-stress regions.

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 slightly more energy than evaporative systems, this is a trade-off we are willing to make because evaporative systems consume vast amounts of water (orders of magnitude more than closed-loop systems) and require costly backup water storage, making the data center more susceptible to risks associated with water supply. As population growth leads to increased water consumption, pressure on groundwater and local watersheds will only increase—a challenge we do not want to exacerbate. As Prime executes our renewable energy strategy and continues to seek improved energy performance, we hope that the adverse environmental impacts associated with energy consumption will decrease, making the energy/water trade-off of closed-loop systems an even easier decision to make.

⁹Neste. "What is Neste MY Renewable Diesel (HVO100)?" Accessed April 30, 2024. <https://www.neste.com/products-and-innovation/neste-my-renewable-diesel/product-information>

¹⁰World Resources Institute. "Aqueduct Water Risk Atlas." <https://www.wri.org/data/aqueduct-water-risk-atlas>

Water Restoration Certificates®: Prime delivers water-optimized data center design and operations, such as by using closed-loop cooling and reclaimed water or rainwater for irrigation, where possible. That said, we hold ourselves accountable for the water we do use and seek to partner with organizations to drive more restorative water practices where feasible. That is why we support the restoration of watersheds by procuring Water Restoration Certificates (WRCs) from Bonneville Environmental Foundation (BEF).

Each year, Prime calculates the water consumption of our operating data centers and procures WRCs¹¹ 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. BEF directs funds to projects with the greatest need and impact at the time of purchase. This year, Prime purchased WRCs for improved water quality in the Chattahoochee River Basin by supporting a partnership implementing agricultural management best practices to restore the ecosystem, reduce nutrient runoff, and improve water flow.

OUR COMMITMENT

- Annually purchase Water Restoration Certificates equal to 120% of operational data center water consumption.

Water Usage Effectiveness (WUE): WUE is an industry metric that measures how efficiently a data center uses water. 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. In other words, WUE Source includes “upstream” water consumption at the plants that generate the power we use. This number provides a more comprehensive understanding of the true water impact from Prime’s electricity consumption. Within our WUE Source calculation, we use the published national average for power utility water efficiency published by The Green Grid, a third-party body that develops various environmental standards for the digital infrastructure industry.¹²

When calculating WUE Site and WUE Source, Prime follows ISO/IEC 30134-9 “Information technology – Data centres key performance indicators – Part 9: Water use effectiveness (WUE).” We use this approach for two reasons. One, we believe third-party standards add credibility and better ensure our methodology is sound. Two, Prime believes it is important for companies within the same industry to use the same approach to metrics since this allows for more effective comparison.

Prime 2023 Water Metrics

WUE Site ¹³	0.005
WUE Source ¹³	2.52

WUE = water consumption used for processing data in a data center (in liters) / IT equipment energy consumption (in kWh)

See our [sustainability data table](#) for a compilation of our key metrics.



¹¹Bonneville Environmental Foundation. “Water Restoration Certificates.” <https://www.b-e-f.org/programs/water-restoration-certificates/>

¹²The Green Grid, <https://www.thegreengrid.org/>

¹³WUE calculations include water used by mechanical systems only, as recommended by the Green Grid. Does not include the handful of data centers we acquired but did not design.

Waste

Minimizing waste is an important part of Prime's efforts to reduce our overall adverse environmental impact. We offer recycling at all data centers and offices. Additionally, at every Prime data center we send universal waste—such as fluorescent lights and batteries—for recycling. In 2024, we began composting at Prime's Denver office—our office with the most employees. It should be noted that our customers are responsible for managing the IT equipment they use in our data centers, including end-of-life processing.

Also in 2024, Prime began actively exploring third-party zero-waste certification programs to implement at our facilities. Most certifications require 12 months of operational data before submission. We expect to pilot the certification process for our data centers in 2025, with the intention of earning a third-party waste certification for all data centers. We also recognize the opportunity to avoid and reduce waste during construction, which is something Prime plans to address as our sustainability program matures.

By the end of 2024, Prime aims to review waste haulers that can provide data on our waste materials, enabling us to develop a baseline and track waste management progress over time.

OUR COMMITMENT

- In 2024, explore zero-waste certifications to assess feasibility of certifying across our portfolio.

Local Ecosystems

Our materiality assessment showed us that GHG emissions, energy, water, and waste are the most important environmental topics to our stakeholders and our business. However, green building certifications, biodiversity, and noise and light pollution are also relevant to us and directly impact local ecosystems.

OUR COMMITMENT

- In 2024, pursue green building certifications, with the aim to eventually earn a third-party certification for all new developments.
- As of 2024, provide electric vehicle charging stations at all new developments as one of our standard features.
- In 2024, explore third-party certifications for providing habitat for pollinators and assess feasibility of certifying across our portfolio.



Local Ecosystems (continued)



Sustainable Design and Green Building Certifications

While environmentally sound features are part of every Prime data center, we recognize the value that third-party green building certifications bring through design validation and enhanced credibility. We are actively exploring third-party certifications such as LEED® and ENERGY STAR® in certain markets, and we hope to set a goal to achieve a third-party certification for all new developments.



Biodiversity

Prime takes care to minimize any potential negative impacts on local species of flora and fauna. Our due diligence process includes assessing whether Prime developments 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 practicable. Prime's land parcels are occupied primarily by data center buildings and supporting features, such as parking lots and infrastructure yards. However, each parcel has some land set aside for landscaping and green space. We are exploring third-party wildlife habitat certifications at select locations in 2024 to support pollinators and native plants, and incorporate other beneficial features. Prime will then apply learnings from the 2024 initiative toward achieving our long-term aspiration of third-party habitat certifications at all net-new data center developments.



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 address them, and continuing to measure noise levels at the perimeter of our properties to ensure ongoing compliance. Prime also designs campuses with a focus on minimizing exterior lighting when it does not affect exterior security. For more information on how we engage our communities, see the [Community Engagement and Responsiveness](#) section.



SERVING OUR COMMUNITIES



Prime strives to promote the well-being of our people and partners.

Prime is passionate about people, and we aim to positively impact the lives of those in our communities. This commitment starts with Prime employees, the soul of our company, and extends to the customers, partners, and suppliers who enable our business to thrive. And as we deliver and operate data centers across the US and Europe, Prime aims to take an active role in the communities that are home to our operations. We strive to have productive and mutually beneficial relationships that advance the well-being of all of our partners.

Health and Safety

Health and safety are core to successfully promoting the well-being of the people we impact. Prime believes that its Environmental Health and Safety (EHS) program goes above and beyond what is required by applicable laws in the communities in which we operate. Our Global EHS Program Manual establishes processes and requirements for maintaining safety at all Prime facilities and offices. The Manual documents roles and responsibilities, as well as processes for correcting and communicating hazards, incident reporting, first aid, electrical safety, fall protection, and other important topics. Our General Contractor Guidelines detail expectations for the safety programs utilized by any General Contractor (GC) providing services to our company. The programs must comply with Prime's extensive EHS requirements related to all aspects of contractor work prior to commencement of any project.

In early 2024, Prime meaningfully advanced our EHS program through multiple initiatives.



Training: Our safety training program has content tailored to specific roles. For example, Critical Operations Technicians must complete an OSHA 30-hour training and be instructed on first aid, hazard communication, CPR, and more.



Job Hazard Analysis: We conducted a job hazard analysis to help us implement safety measures and reduce risks. We utilize a "5-why" root-cause analysis to understand the underlying causes of workplace risks and enable us to develop the most effective measures to manage them.



Audits: We began rolling out our health and safety audit program in the first half of 2024 and completed audits at all construction projects. Construction audits will be performed at least once per month by our Director of EHS. Our next priority is to implement health and safety audits at operational data centers, which we plan to audit quarterly by our Director of EHS and more frequently by data center chief engineers. Our hope is to include audit program metrics in next year's sustainability report.

Prime health and safety is led by a dedicated 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.

Prime 2023 Health and Safety Metrics

Total Injuries—Employees	0
Total Injuries—Contractors / Subcontractors	4
Recordable Injuries—Employees	0
Total Recordable Injury Rate—Employees	0.00
Lost Time Injuries—Employees	0
Lost Time Injury Rate—Employees	0.00

Employee Engagement and Development

For our employees, we want working at Prime to mean more than just getting a paycheck. Our goal is for employees to thrive professionally, grow their skills, and find meaning in what they do. Prime tries to foster a culture that empowers team members to bring their authentic selves to work, be challenged while they leverage their strengths, and develop meaningful connections with fellow Prime-Time Players. We are proud of our culture, and Prime views it as a key factor in achieving short- and long-term success.

Compensation and Benefits: Prime offers market-competitive compensation and a holistic benefits package that includes medical coverage, life insurance, 401(k) with company match (with employees immediately vested in the match), 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. To promote health and wellness, Prime offers every employee a free membership in an app that provides access to thousands of gyms as well as fitness classes, nutrition coaching, and mental well-being resources. In addition, Prime offers an Employee Assistance Program (EAP) that includes up to three face-to-face, confidential emotional support sessions per year.

Professional Development: Prime supports employee professional growth in multiple ways. Every employee hired before August of the previous year is part of our annual performance review process, which is a 360-degree approach that includes documented feedback from the employee, their manager, and others who work closely with that person. For certain roles, we have defined career path milestones and expectations to provide transparency on advancement within the company. For example, for Data Center Operations Technicians, Prime has identified trainings and exercises for various levels. This provides employees with an understanding of

what is expected of them in their current role and more senior levels should they seek to advance. In 2024, Prime is launching a Learning Management System to further enhance training efficiency and effectiveness. We plan to continue to cover the cost of external trainings, certifications, and professional development related to any role.

Employee Engagement: Prime conducts semi-annual “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 to gauge overall employee sentiment. Categories are rated as Needs Improvement, Good, Great, or Excellent. We aim for every category to be rated as Great or Excellent.

For our pulse survey in the second half of 2023, five of eight categories hit our target ratings, with three rated as “Good.” Numerous steps were taken to respond to employee feedback and act on these results, including obtaining more competitive health insurance rates, investing in more talent acquisition resources, and planning more meaningful departmental team-building activities.

Other employee engagement efforts include all-hands meetings, employee-led lunch and learns, and events such as chili cook-offs and pie-eating contests. Prime believes that building and maintaining a strong culture is not only good for business, it fosters overall happiness and well-being.

OUR COMMITMENT

- Achieve “Great” or “Excellent” ratings on pulse survey categories.



Diversity and Inclusion

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. All applicants are considered for employment without attention to race, color, age, religion, sex (including pregnancy, childbirth, or related medical conditions), sexual orientation, gender identity or expression, genetic information, ancestry, national origin, citizenship, protected veteran or military status, disability status, or any other classification protected by federal, state, or local laws and ordinances.

Our company is growing quickly, and we are mindful of the importance of diversity of thought. While we will always hire the best candidate for the role, we strive to ensure that our recruitment processes reach a diverse slate of potential applicants. We believe that by taking the time to promote positions broadly to wide audiences, we will connect with candidates that represent a range of experiences and perspectives. When feasible, we cast a wide net at the beginning of the recruitment process to help enhance the diversity of our company.

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

In 2023, a large number of Prime-Time Players attended an off-site team-building event in New Orleans to discuss goals, strategy, and departmental road maps. Post-event feedback was extremely positive and demonstrated a stronger sense of connection to the company and colleagues. The next company retreat will be held in the second half of 2024.

Supplier Diversity

Prime strives to create opportunities for companies owned by groups who may be underrepresented in our industry—such as people with disabilities, veterans, and people of color—through our purchasing. We will always choose the partner that is best suited to each requirement and that creates value for our company, and we will view distributing project RFPs to a wide range of possible suppliers, including those owned by underrepresented groups, as an important part of that process. We believe that supplier diversity is important to consider in business decision-making.

As a provider of hyperscale and wholesale data centers, Prime's procurement efforts are largely focused on design, construction, and infrastructure, such as electrical and mechanical equipment. In 2024, we are committed to establishing a supplier diversity baseline with the intent to set a procurement target in 2025.



OUR COMMITMENT

- Establish a baseline of diverse supplier spend in 2024 and set a target in 2025.



Community Engagement and Responsiveness

As stated earlier, Prime aims to be a force for good in the communities where we conduct business. Our contributions go above and beyond economic activity, such as tax revenue and job creation. The data center industry has been shown to convert underperforming industrial zones into revenue-generating ecosystems with increasing land values. During the development process, Prime tries to be intentional about listening to and understanding local priorities, especially when our projects are in close proximity to residential areas.

Prime regularly meets with local governments, economic development offices, city councils, and neighborhood groups to keep abreast of community needs and collaborate on and contribute to solutions when possible. During the data center development process, we strive to be responsive to community needs by offering to implement measures such as planting trees, improving landscaping, incorporating walking paths, painting murals on exterior walls, and supporting local groups that directly support the community. We also support the betterment of communities through efforts such as our 10-year sponsorship of the Elk Grove Village summer concert series. Additionally, Prime's due diligence process includes thorough assessments to try and ensure developments do not negatively impact sites of historical or cultural significance.

In 2024, we updated our due diligence checklist to include talking to groups serving the community to better understand their priorities and how we can support them. Moving forward, we aim for every new data center to have a budget earmarked to support community social or environmental needs.



OUR COMMITMENT

- Dedicate budget for new data center projects to support community social or environmental needs.

Workforce Development

The digital infrastructure industry is growing rapidly and must increase its talent pool to meet demand. Prime is addressing this challenge by partnering with industry organizations, such as the Infrastructure Masons and Nomad Futurist. We are also committed to taking direct action in local communities and 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.



OUR COMMITMENT

- Create a Workforce Development program to support students in our communities and develop the talent pipeline for our industry.

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.

In 2023, 80% of employees at Prime's Denver office (our office with the most employees) volunteered to serve meals at the Denver Rescue Mission, a nonprofit that supports Denver residents experiencing homelessness. We are proud of this turnout and hope for even higher engagement as the Denver office continues to grow.

In 2024, Prime formed a Giving Committee to establish formal policies and programs for our giving. In addition to developing company-wide guidelines, this committee will work to provide opportunities for all Prime-Time Players to get involved, including employees who work remotely. We look forward to sharing more community support success stories in next year's report.



LIVING OUR VALUES



Prime holds itself to a higher standard.

Executing with integrity and excellence is the foundation for long-term business success. Prime is committed to governance practices of the highest caliber, which is essential to delivering on our commitments, building trust, and creating value.

Ethics and Compliance

Prime conducts business with the highest ethical standards. This includes how we interact with employees, customers, and partners as well as decisions we make in our day-to-day operations. 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 bribery, 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.



Supplier Sustainability

Prime is committed to awareness of how our suppliers are managing environmental and social topics in their operations and supply chain. Suppliers must adhere to Prime's Supplier Code of Conduct, which defines expectations and requirements in the areas of health and safety, human rights and labor, the environment, ethics and anti-corruption, and more. Our focus on human rights centers on suppliers since Prime employees are based in developed democracies with strong human rights protection.

In 2024, Prime formalized efforts to gather certain sustainability information from suppliers. This will help us 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 environmental impacts.

Prime aims to collect our first round of data in 2024, which will allow us to set baselines and identify metrics to measure improvement. We look forward to using this year as a learning experience to set the foundation for more meaningful future supplier engagement on sustainability topics.



OUR COMMITMENT

- In 2024, began to collect sustainability data from suppliers, establish baseline, and identify metrics to track progress.

Information Security

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 and take mandatory cybersecurity training. All employees, including executives, 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 Prime's control.

For data that does fall within Prime's information security scope, we implement numerous controls and practices for protection. This includes regular scanning of our infrastructure for vulnerabilities such as outdated systems and software, reviewing firewall rules to ensure they are current and sufficient, and conducting third-party testing for external threats. Prime requires regular password changes and enforces 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 intend to perform an audit to the Payment Card Industry Data Security Standard (PCI-DSS) later in 2024.

Prime also carefully manages employee access to systems, following the principle of "least privilege" by limiting user access to what is required to do their job. We regularly review access to all systems to make sure users are current and appropriate, and when someone leaves the company, access is revoked immediately.

We conduct third-party audits to ensure policies and procedures are being implemented as intended. In late 2023, Prime completed a SOC 2 Type II audit for our Sacramento data center, and we plan to do additional SOC 2 audits in the future. Later in 2024, we plan to conduct an ISO 27001 audit for all of our active buildings and operations. This comprehensive review will 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.

OUR COMMITMENT

- In 2024, complete an ISO 27001 audit for all of our active buildings and operations.

Physical Security and Business Continuity

The ability to physically secure Prime data centers and 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 SDGs







Sustainability Performance Data Table

Protecting Our Home			
Topic	Indicator	Metric	Link to Report Content
Energy	Design PUE—75% Critical Load	1.29	SEE ENERGY SECTION
	Design PUE—100% Critical Load	1.33	
	Operating PUE	1.44	
Water	WUE Site	0.005	SEE WATER SECTION
	WUE Source	2.52	
Serving Our Communities			
Topic	Indicator	Metric	Link to Report Content
Health and Safety	Total Injuries—Employees	0	SEE HEALTH AND SAFETY SECTION
	Total Injuries—Contractors/Subcontractors	4	
	Recordable Injuries—Employees	0	
	Total Recordable Injury Rate—Employees	0.00	
	Lost Time Injuries—Employees	0	
	Lost Time Injury Rate—Employees	0.00	
Employee Engagement	Employees responding to latest pulse survey	76%	SEE EMPLOYEE ENGAGEMENT AND DEVELOPMENT SECTION
	Pulse Survey Categories Rated as Great or Excellent	5 of 8	
	Pulse Survey Categories Rated as Needs Improvement	0 of 8	
Volunteering	Employee Volunteer Participation at our Largest Office	80% or more per event	SEE VOLUNTEERING SECTION








United Nations Sustainable Development Goals

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.”¹⁴ 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 also identified goals that, while not always closely tied to our impacts, are still addressed in a meaningful way and are identified in the table below.

SDGs Most Closely Aligned to Our Impacts		
SDG	SDG Targets	How Prime Supports
Clean Water and Sanitation 	<ul style="list-style-type: none"> 6.4: By 2030, substantially increase water-use efficiency across all sectors and ensure sustainable withdrawals and supply of fresh water to address water scarcity, and substantially reduce the number of people suffering from water scarcity 6.6: By 2020, protect and restore water-related ecosystems, including mountains, forests, wetlands, rivers, aquifers, and lakes 	<ul style="list-style-type: none"> Incorporating only closed-loop water cooling systems in our designs Balancing water consumption at all operating data centers with Bonneville Environmental Foundation's Water Restoration Certificates (which began with 2023 operations) SEE WATER SECTION
Affordable and Clean Energy 	<ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> Designing for energy efficiency in order to reduce energy consumption Partnering with communities to offer district heating using waste heat from our data centers Increasing demand for renewable energy by acquiring renewable electricity and exploring hydrotreated vegetable oil as an alternative to diesel SEE ENERGY SECTION
Industry, Innovation and Infrastructure 	<ul style="list-style-type: none"> 9.1: Develop quality, reliable, sustainable, and resilient infrastructure, including regional and transborder infrastructure, to support economic development and human well-being, with a focus on affordable and equitable access for all 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 	<ul style="list-style-type: none"> Supporting digital infrastructure and increased internet access by developing data centers Partnering with communities to offer district heating using waste heat from our data centers SEE ENERGY SECTION
Climate Action 	<ul style="list-style-type: none"> 13.3: Improve education, awareness-raising, and human and institutional capacity on climate change mitigation, adaptation, impact reduction, and early warning 	<ul style="list-style-type: none"> Designing for energy efficiency in order to reduce energy consumption Increasing demand for renewable energy by acquiring renewable electricity and exploring hydrotreated vegetable oil as an alternative to diesel Partnering with communities to offer district heating using waste heat from our data centers Researching lower-carbon cement technologies to address embodied carbon in our supply chain SEE CLIMATE SECTION

¹⁴United Nations. <https://sdgs.un.org/goals>

Additional SDGs Aligned to Our Impacts

SDG	SDG Targets	How Prime Supports
Gender Equality 	<ul style="list-style-type: none"> 5.5: Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic, and public life 	<ul style="list-style-type: none"> Demonstrating equity in our hiring practices Promoting an inclusive workplace SEE DIVERSITY AND INCLUSION SECTION
Decent Work and Economic Growth 	<ul style="list-style-type: none"> 8.2: Achieve higher levels of economic productivity through diversification, technological upgrading, and innovation, including through a focus on high value-added and labor-intensive sectors 8.7: Take immediate and effective measures to eradicate forced labor, end modern slavery and human trafficking, and secure the prohibition and elimination of the worst forms of child labor, including recruitment and use of child soldiers, and by 2025, end child labor in all its forms 	<ul style="list-style-type: none"> Supporting economic development through expanded digital infrastructure Promoting human rights and labor issues through our supply chain code of conduct and supplier engagement SEE DIVERSITY AND INCLUSION SECTION
Reduced Inequalities 	<ul style="list-style-type: none"> 10.3: Ensure equal opportunity and reduce inequalities of outcome, including eliminating discriminatory laws, policies, and practices, and promote appropriate legislation, policies, and action in this regard 10.4: Adopt policies, especially fiscal, wage, and social protection policies, and progressively achieve greater equality 	<ul style="list-style-type: none"> Supporting equal opportunity employment Promoting an inclusive workplace SEE DIVERSITY AND INCLUSION SECTION
Responsible Consumption and Production 	<ul style="list-style-type: none"> 12.2: By 2030, achieve the sustainable management and efficient use of natural resources 12.5: By 2030, substantially reduce waste generation through prevention, reduction, recycling, and reuse 12.6: Encourage companies, especially large and transnational companies, to adopt sustainable practices and to integrate sustainability information into their reporting cycle 	<ul style="list-style-type: none"> Managing material use and minimizing waste in our developments and operations Publishing an annual Sustainability Report SEE WASTE SECTION
Life on Land 	<ul style="list-style-type: none"> 15.5: Take urgent and significant action to reduce the degradation of natural habitats, halt the loss of biodiversity, and, by 2020, protect and prevent the extinction of threatened species 	<ul style="list-style-type: none"> Mitigating potential negative impacts on biodiversity as part of our due diligence process SEE BIODIVERSITY SECTION

Disclaimer

This Sustainability Report (the "Report") is provided by Prime Data Centers LLC (the "Company") with respect to the environmental, social and governance and sustainability-related (collectively referred to as "sustainability-related" throughout this Disclaimer) performance of the Company. We seek to note exclusions where applicable in the data contained herein, but cannot guarantee that all such exclusions or limitations will be reflected in all instances where they may occur. This Report covers the time period beginning on January 1, 2023, and ending on December 31, 2023, unless otherwise indicated.

This Report and other related information are for informational purposes only and are solely intended to summarize the Company's sustainability-related initiatives and strategies and not to summarize or predict investment performance. Nothing in or related to this Report should be construed as investment, legal, tax, regulatory, accounting, or other advice of any kind and should not be relied upon to make an investment decision or for any other purpose. This Report does not constitute an offer to sell, or the solicitation of an offer to buy any product or service, including interests in the Company.

Any information provided in this Report about past performance is provided solely to exemplify various aspects of the Company's sustainability-related processes and strategies. References to selected examples or case studies are included for illustrative purposes only and should not be viewed as a recommendation of any kind, nor are they representative of the sustainability-related processes and strategies deployed with respect to the entirety of the Company's operations. It should not be assumed that activities made in the future will be comparable in quality or performance to those described herein. This Report is not intended to make representations as to the sustainability-related initiatives of our customers, suppliers, contractors or similar persons or entities or any third parties, whether named herein or otherwise, which may involve information and events that are beyond our control. The reader should not assume that any safety measures, environmental or social goals, efforts and procedures or similar commitments will be followed in all respects and at all times.

Some of the information contained in this Report is based on data that has been sent to or obtained from third-party sources including our suppliers, vendors, customers, contractors, managers, advisors and other representatives, and has not necessarily been reviewed or independently verified or assured

by the Company or any other third party. The Company makes no representation or warranty as to sustainability-related information sent to, received from or collected by third parties. Furthermore, unless explicitly noted in each instance where it occurs, the sustainability-related data provided in this Report has not been audited or subject to any third-party assurance process. The information contained in this Report is not reported according to established standards or protocols, does not purport to be complete, and is subject to change at any time without notice.

The Company makes every effort to collect reliable, comprehensive ESG data, but we make no guarantee that it is accurate or complete. Some of the data provided in this Report may be estimated or reliant on estimated information, which are inherently imprecise. The Company cannot guarantee that estimated data is identified as such in every instance. Not all data relating to sustainability-related metrics reported herein is available, applicable or comparable for all geographies in which we operate in - or may operate in - and methodologies for collecting, measuring, calculating, analyzing, as well as requirements for reporting, sustainability-related metrics may differ or not yet be fully developed for industries or geographies depending on various facts and circumstances or third-party contractors may not provide requisite sustainability-related data with respect to all metrics. Moreover, there are inherent uncertainties in providing sustainability-related data due to the limitations, complexity and novelty of many methodologies for collecting, measuring, calculating and analyzing sustainability-related data. While we anticipate continuing to monitor and report on certain sustainability-related information, we do not guarantee the completeness of such information and cannot guarantee that such data will be consistent year-to-year, as methodologies and expectations continue to evolve and vary across companies, industries, jurisdictions and regulatory bodies. In addition, the number and location of our facilities change over time and, as a result, although we may provide historical information in this Report, information provided with respect to our facilities may not be a comparable data set year over year.

The information in this Report is only as current as the date indicated and may be superseded by subsequent market events or for other reasons. The Company does not have any responsibility to update this Report or previous sustainability reporting to account for any changes, including those referenced above. The Company also does not accept any responsibility for the content of such information and makes no representation

nor warranty, express or implied, with respect to the accuracy, reasonableness, or completeness of any of the information contained herein, including without limitation, information obtained from any third parties. The information contained herein is not intended to address the circumstances of any particular individual or entity and is being shared solely for informational purposes.

Certain statements contained in this Report, including without limitation, statements containing the words "anticipate," "believe," "budget," "continue," "could," "expect," "goal," "intend," "likely," "may," "plan," "potential," "project," "seek," "should," "target," "will," and words of similar import or the negative thereof constitute "Forward-Looking Statements," although not all Forward-Looking Statements contain such words. All statements other than statements of historical facts, including those regarding our expectations, beliefs, projections, future plans and strategies, anticipated events or trends, and similar expressions are Forward-Looking Statements. In particular, this Report contains Forward-Looking Statements pertaining to, but not limited to, information with respect to the following: our investment strategies, priorities, and expected performance; sustainability-related values, focus areas, goals, priorities and initiatives, including, among others, those related to sustainability performance reporting and data collection, cybersecurity, physical facility security, GHG emissions, air emissions, light and noise pollution, decarbonization, battery storage, EV infrastructure, renewable fuels, investment and utilization of innovative technology, water management and use reduction, biodiversity, diversity, equity and inclusion, supply chain management, community relations and philanthropy, and health and safety; our plans to achieve our sustainability-related goals and to monitor and report our progress thereon; and other related items.

Such Forward-Looking Statements involve known and unknown risks, uncertainties, and other factors that may cause the actual events or results to differ materially from those reflected or contemplated in such Forward-Looking Statements. Our actual results and financial conditions, including the development, implementation or continuation of any investment strategies, priorities and expected performance, project, program, policy or initiative discussed, may differ materially from those included in these statements due to a variety of risks, uncertainties and factors, including, among others, those related to global socio-demographic and economic trends; increases in the adoption of new technologies such as Artificial Intelligence; competition;

technological innovations; scientific developments; availability of data; risks associated with the transition to a low-carbon economy; physical risks related to changing weather patterns or increased frequency of extreme weather events such as hurricanes or floods; legal, legislative and regulatory changes; insurance applicability; the Company's ability to attract and retain qualified employees; natural or man-made events or disasters including terrorist attacks, endemics, and pandemics; increased attention to sustainability-related matters; the Company's ability to accurately forecast future capital or operating investment needs; tax liabilities; risks related to the Company's public statements with respect to such matters that may be subject to heightened scrutiny from public and governmental authorities related to the risk of potential "greenwashing," i.e., misleading information or false claims overstating potential sustainability-related benefits, which could lead to increased litigation risk from private parties and governmental authorities or regulatory bodies related to the Company's sustainability-related efforts; and risks that the Company may face regarding potentially conflicting anti-ESG initiatives from certain U.S. state governments that may impact its ability to conduct certain business within those jurisdictions, as well as from Congress; and other unforeseen events or conditions. No representation or warranty is made, or assurance given, that such Forward-Looking Statements are correct or that the objectives of the Company will be achieved. The Company expressly disclaims any intention or obligation to update or revise any information included in this Report and do not accept any liability for loss arising from the use of or reliance upon this Report.

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 any disclosures required under applicable rules and regulations, including state or U.S. federal securities laws.

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